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February 11, 2004

**BY HAND**

Hon. Bryant L. VanBrakle  
Secretary  
Federal Maritime Commission  
800 North Capitol Street  
Room 1046  
Washington, DC 20573

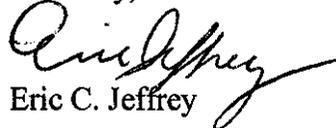
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OFFICE OF THE SECRETARY  
FEDERAL MARITIME COMM

Re: Petition No. P1-04 – Danzas Corporation  
Petition No. P2-04 – BDP International, Inc.

Dear Mr. VanBrakle:

Enclosed please find an original and 15 copies of the Comments Of American President Lines, Ltd. And APL Co. Pte., Ltd. in reply to the petitions in the above-referenced dockets. Also enclosed is a diskette containing a copy of the comments in Word format.

Sincerely,

  
Eric C. Jeffrey

cc: Carlos Rodriguez, Esq.

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BEFORE THE  
FEDERAL MARITIME COMMISSION

OFFICE OF THE SECRETARY  
FEDERAL MARITIME COMM

Docket No. **P1-04**

Petition of Danzas Corporation d/b/a **Danmar** Lines Ltd., Danzas AEI Ocean Services, and DHL Danzas Air and Ocean for Exemption From the Tariff Publishing Requirements of Section 8 of the Shipping Act of 1984, as Amended

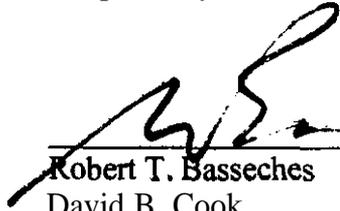
Docket No. **P2-04**

Petition of BDP International, Inc. for Exemption From the Tariff Publishing Requirements of Section 8 of the Shipping Act of 1984, as Amended

Comments of American President Lines, Ltd.  
and APL Co. Pte., Ltd.

It is the position of American President Lines, Ltd. and APL Co. Pte., Ltd. (“APL”) that the captioned petitions, noticed in the February 3, 2004 *Federal Register* (69 Fed Reg. 5155, 5 156). raise the same factual and policy issues that were raised in the five earlier petitions identified in the February 3, 2004 *Federal Register* Notice, Petition Nos. **P3-03** (United Parcel Service, Inc.), **P5-03** (National Customs Brokers and Forwarders Association of America, Inc.), **P7-03** (Ocean World Lines, Inc.), **P8-03** (BAX Global, Inc.) and **P9-03** (C. H. Robinson Worldwide, Inc.). Accordingly, APL incorporates by reference in Docket Nos. **P1-04** and **P2-04** the Comments (dated October 10, 2003) and Further Comments (dated January 16, 2004) that APL filed in those earlier dockets.

Respectfully Submitted,



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**Robert T. Basseches**

David B. Cook

Eric C. **Jeffrey**

**SHEA & GARDNER**

1800 Massachusetts Ave., N. W.

Washington, DC 20036

(202) 828-2000

Attorneys for American President Lines, Ltd.  
and APL Co. Pte., Ltd.

February 11, 2004

**CERTIFICATE OF FILING**

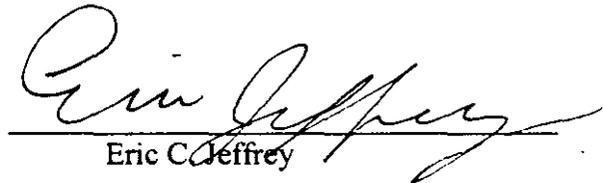
I certify that on February 11, 2004, I filed and served the Comments of American President Lines, Ltd. and APL Co. Pte., Ltd in Dockets PI-04 and **P2-04** by causing copies to be delivered as follows:

**BY HAND**

Hon. Bryant L. **VanBrakle** (Original and 15 copies)  
Secretary  
Federal Maritime Commission  
800 North Capitol Street, Room 1046  
Washington, DC 20573-0001

**BY FIRST-CLASS MAIL**

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Eric C Jeffrey