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Office of the Executive Managing Director and Legal Counsel

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Federal Maritime Commission
800 N. Capitol Street, NW
Washington, DC 20573

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FEDERAL MARITIME COMMISSION

To Whom it may concern:

We understand that Cosco Container Lines will be officially moving the registered “controlling entity” of their Transatlantic services Trade to their European HQ in Hamburg, Germany and as such, they need to petition to FMC for an exemption to the rule that foreign controlled entities **can only lower rates on 30 days notice**. We further understand the new entity will be called Cosco Container Lines Europe GmbH.

The ocean freight market is extremely competitive and carriers need the capability to react to customer requests for rate adjustments in a timely manner. We have been using Cosco Container Lines for many years and they have shown themselves to be fair, above board, and always adhering to FMC regulations. If they cannot continue to function in the same capacity and rules under the new entity name, it will make it difficult for companies like ours to continue to work with them on freight rate issues that require fast resolution.

We sincerely hope that the FMC will give consideration to their application for this exemption.

Regards,



Joseph T. Saggese
Executive Managing Director