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FMC-3338

January 28, 2015

Ms. Karen V. Gregory
Secretary
Federal Maritime Commission
800 North Capitol Street, NW
Washington, DC 20573

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OFFICE OF THE SECRETARY
FEDERAL MARITIME COMM

Re: Petition P1-14 by United Arab Shipping Company (UASC)

Dear Ms. Gregory:

We hereby submit our comments in support of the petition of UASC for an exemption from the requirements of 46 U.S.C. section 40703, which requires co-called controlled carriers to give 30 days' notice of a reduction in their tariff rates.

Under the Shipping Act, the Federal Maritime Commission (FMC) may grant a petition such as this if it finds that the exemption will not result in a substantial reduction in competition or be detrimental to commerce. The FMC has found these criteria to be satisfied by numerous petitions by controlled carriers seeking the same relief now sought by UASC, and has granted those petitions. See Petitions P1-10, P6-04, P5-04 and P6-03. We believe these criteria are also satisfied by UASC.

We export cargo from the United States to various destinations throughout the world. We use a number of ocean carriers to transport our cargo, including UASC. Granting UASC's petition will merely allow it to compete on the same terms and conditions as other carriers currently operating in the foreign commerce of the U.S.

By being able to reduce a tariff rate with immediate effect, UASC can compete with other carriers for cargo, and respond in a timely manner to changes in market conditions. Granting UASC this ability to compete on the same terms as other carriers will have no detrimental impact on commerce, and will be pro-competitive.

In light of the foregoing, we urge the FMC to grant UASC's petition.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kevin Bulger", is written over a horizontal line.

Kevin Bulger
Chief Operating Officer
For and on behalf of
Apex Maritime Co., Inc.
DBA Apex Shipping Company