

# Royal Caribbean Cruises Ltd.

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February 10, 2010

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

Dear Ms. Gregory:

Pursuant to the Notice of Inquiry regarding Passenger Vessel Financial Responsibility published by the Federal Maritime Commission on December 3, 2009, enclosed please find the responses of Royal Caribbean Cruises Ltd. to Questions 1 through 3. We support and adopt the responses of the Cruise Lines International Association to Questions 4 through 9 and defer to sureties and credit card companies for responses to Questions 10 through 12.

Thank you for the opportunity to respond to the Commission's inquiry. If you have additional questions or require additional information, please do not hesitate to contact me.

Sincerely,



Eleni P. Kalisch  
Vice President  
Federal Government Relations

Enclosure

**RESPONSES OF ROYAL CARIBBEAN CRUISES LTD. (RCL) TO  
NOTICE OF INQUIRY PUBLISHED BY  
THE FEDERAL MARITIME COMMISSION  
DECEMBER 3, 2009**

*Note – The responses identified as “confidential” contain information that is proprietary to RCL. RCL is disclosing this information to the FMC in confidence and requests that this information be treated as such.*

**A. Passenger Vessel Operators' Cost of Complying with Nonperformance Regulations**

- 1. Do you expect your company's unearned passenger revenue to increase, decrease or remain the same over the next twelve to twenty-four months? If you expect it to change, by what percent?**

RCL Response - CONFIDENTIAL:

- 2. Set forth a detailed description of your actual costs for 2008, and actual or projected costs for 2009, directly related to satisfying the FMC's PVO regulations for nonperformance coverage.**

RCL Response - CONFIDENTIAL:

- 3. With respect to passenger bookings and payments:**

- (i) What is your company's policy with regard to passenger reimbursement in the event of nonperformance of a cruise?**

RCL Response:

RCL's policy is to reimburse our guests in full as promptly as possible when an entire cruise is canceled and we are unable to perform. Such cancellations, however, are extremely rare. For example, during the past 10 years, RCL has operated over 14,600 cruises, of which only 76 cruises (0.5 percent) have been canceled. These cancellations were the result of either mechanical or weather-related issues. In these rare instances of cancellations, passengers were reimbursed in full any advance payments made to RCL.

- (ii) What is your company's booking policy regarding the timing and amount of booking deposit and for payment of any fare balance?**

RCL Response:

For U.S. guests, RCL generally requires the initial booking deposits within 7 days of booking a cruise; the balance of the cruise fare is due 60-90 days prior to the sail date. Deposit amounts for U.S. guests are typically \$100 USD per person (for cruises of 5 nights or less), \$250 per person (for cruises of 6-8 nights), and \$450 per person (for cruises that are 9 nights or more). Deposit terms differ for non-U.S. guests who purchase their cruises at various markets outside of the U.S.