



Frederick Malesa  
Vice President  
International Intermodal

BNSF Railway Company  
2650 Lou Menk Drive  
Fort Worth, Texas 76131

OFFICE OF THE SECRETARY  
FEDERAL MARITIME COMM

Telephone 817-867-6558  
FAX 817-352-7129

Email Address: frederick.malesa@bnsf.com

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

Monday, January 06, 2014

RE: FMC accepting public comments on P3

Secretary Karen V. Gregory:

In response to your public call for comment on the proposed P3 Vessel Sharing Agreement, we would like to share our support for the development and implementation of the proposed P3 Network.

As the leading intermodal rail carrier and an inland transportation provider for ocean carriers, we see the P3 as an overall positive development for various stakeholders in the supply chain. The P3 development can lead to greater efficiencies and innovative service products in the markets it serves. Some of these benefits include:

- Enhanced ocean services including greater port coverage
- Improvements in transit times that benefit shippers
- More frequent and reliable service

P3 is a positive step for the Supply Chain.

Thank you,

Fred Malesa

RECEIVED

2014 JAN 23 AM 8: 21

[www.miamidade.gov/portofmiami](http://www.miamidade.gov/portofmiami)

January 9, 2014

OFFICE OF THE SECRETARY  
FEDERAL MARITIME COMMISSION

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

RE: P3 Network Vessel Sharing Agreement

Dear Ms. Gregory:

In response to your call to comment on the referenced subject, we are pleased to express PortMiami's support for the development and implementation of the proposed Vessel Sharing Agreement (P3).

We see the P3 as having the potential to provide a positive impact for PortMiami and the container shipping industry overall as it promises to provide:

- Enhanced ocean services including greater port coverage
- Increased overall stability in the market
- Service stability
- Consistent and convenient transit times
- Increased number of weekly sailings

At present, PortMiami is investing approximately \$2 billion in infrastructure that will allow the port to double cargo and create new, well-paying jobs. The deepening of our harbor will allow PortMiami to be one of three East Coast ports that will be at -50 feet when the expanded Panama Canal opens in 2015, and will stand ready to accommodate new traffic and larger vessels which will be part of the expanded P3 service. The restoration of on-dock rail and the completion of a tunnel linking the port to the Interstate Highway System will help carriers, shippers and users handle containers more efficiently both in and out of the U.S. Southeast and the Heartland.

We strongly support the P3 initiative and believe it will assist both PortMiami and our local partners increase trade and more efficiently process containers through our gateway.

Sincerely,



Juan Kuryla  
Director Designee  
PortMiami

**Federal  
Maritime  
Commission**

Secretary Mailbox <secretary@fmc.gov>

**p3 public call**

1/10/2014

**Ercument Selamet** <ercumentselamet@turkon.com>

Fri, Jan 10, 2014 at 4:58 AM

To: secretary@fmc.gov

Friday, January 10, 2014

TRK Shipping Inc.

Altunizade mah. Ord.prof.Fahrettin Kerim Gokay cd.

No.33 k.1 34662 Uskudar/Istanbul

Turkey

Karen V. Gregory

Secretary, Federal Maritime Commission

800 North Capitol Street, NW

Washington, DC 20573

RE: FMC accepting public comments on P3

Secretary Karen V. Gregory:

In response to your public call for comment on the proposed P3 Vessel Sharing Agreement, I would like to share my concern for the development and implementation of the proposed P3 Network.

As a small sized freight forwarding and logistics company based in Turkey

and willing to penetrate into US market as well as Far East and Europe , I do certainly appreciate the opportunity to comment.

I see the P3 as potentially threat for my company and the container shipping industry overall because TRK is very concerned about the significant buying power granted to mega-alliances like P3 and other large consortia. We believe that a consortium's ability to negotiate and offer products and services as a bloc greatly distorts the

market, and makes it impossible for non-consortium carriers to compete with them.

As small sized company willing to position itself as exclusive service provider to the clients who are so much disturbed by the mega carriers by their Customer services and operation follow ups and limit to negotiation when any problems occur in the services provided by mega carriers.

We are a service provider located on the main Street as a small walk-in shops and offering our products to those clients who are not willing to go to shopping malls or supermarkets.

In granting carrier consolidations like P3 authority to operate as a bloc, you give this mega-alliance the unique hand in every trade lane, because independant carriers do not have the buying power of a large consortium. We will be loosing our bargaining power against mega alliances and terminal operators as they will fix the rates and will offer the same service pattern on same vessels and on same routes which will certainly diminish our entry to market as a new player depended on vessel operators and terminal operators.

Furthermore, the rise of giant alliance worldwide will eventually bring about the demise of the smaller players as ocean transportation intermediaries, the smaller players, the smaller stevedores, the smaller truckers and the smaller logistics suppliers of every type. With more and more Cargo being handled by a few large alliance, they will use their volume to select those vendors who marginally price their products and services at the lowest levels, putting all smaller enterprises out of business.

If P3 is approved by the FMC, then you will force every remaining carrier to join forces in a similar bloc to be competitive. The single, independent carrier will go out of business. American exporters will no longer have a large portfolio of carriers to choose from. Instead, he will have only 2 or 3 big consortia to choose from, with service one or two days per week instead of 7 days per week as today.

The smaller intermediaries, smaller truckers, smaller logistics vendors and smaller ports will quickly disappear. American manufacturers will eventually pay the price as both choice and service deteriorates.

P3 will surely produce a unique competitive advantage that could lead to changes in the market and put the P3 in a position to expand still more its dominant market shares , In addition, our expectation that P3 will be able to not only restrict competition by controlling capacity within the three partners, but even beyond these three partners and even terminal operators we are forced to work at fixed tariffs with no other choice.

As a result, the shipping rates and terminal rates for customers and forwarders will increase accordingly. Especially in the case of bookings at short notice, the reduction in departure frequency can lead to serious problems in ensuring an efficient supply chain.

FMC should carefully consider that those lines in p3 are also main terminal operators in the world. They can easily play with seafreight and terminal rates. Our concern that by adding or removing shipping capacities and selecting certain terminals, there will be an indirect influence on price fixing.

Nevertheless, the american shippers will certainly be convinced that in the long term the P3 will have an impact on the market shake out and that shippers will be confronted with higher prices.

As a result, taking a long-term view, the market power created by the P3 can ultimately lead to deterioration in quality and service .The long-run consequence could be significantly increased concentration amongst shipping lines and terminal operators.

We hope that the FMC will carefully question p3 about the main motive and reasons why they would like to set up a giant alliance as world's top 3 carriers who are

expected to compete in all way but forming a giant alliance.

We are very much concerned about free competition and easy access to independent carriers and terminals to create a bit of differentiation. We are very much small player in the market and struggling heavily with these global carriers in all consortias by being pushed away from their area of biz. We cannot act independently against lines as we donot have any vessels in operation but offer our exclusive service to direct clients who fail to get from giant lines.

Alliances means getting togeter and fixing the rules of the games that will also help them to design the game.

We hope that the FMC will carefully review the overwhelming advantages of coordinated carrier groupings like P3 vis a vis the single operators and terminals.

Best regards,

Ercument Selamet,M.Sc.

Managing Director



Altunizade mah. Ord.prof.fahrettin kerim gokay cd.

No.33 k.1 34662 uskudar Istanbul/ Türkiye

Telephone: +90 (0) 216 544 59 35

Mobile: +90 (0) 533 685 2475

e-mail: [ercumentselamet@turkon.com](mailto:ercumentselamet@turkon.com)

**Federal  
Maritime  
Commission**

Secretary Mailbox &lt;secretary@fmc.gov&gt;

**FMC Accepting Public Comments on P3 Alliance**

1 message

Styrk, Linda &lt;Styrk.L@portseattle.org&gt;

Fri, Jan 17, 2014 at 12:47 AM

To: "secretary@fmc.gov" &lt;secretary@fmc.gov&gt;



Port of Seattle

P.O. Box 1209

Seattle, WA 98111

Karen V. Gregory

Secretary, Federal Maritime Commission

800 North Capitol Street, NW

Washington, DC 20573

RE: FMC Accepting Public Comments on P3 Alliance

January 16, 2014

Dear Secretary Karen V. Gregory:

I am writing in response to your public call for comment on the proposed P3 Network Vessel Sharing Agreement. The Port of Seattle supports the development and implementation of the P3 Agreement.

As the 3<sup>rd</sup> largest container load center in the U.S., the Puget Sound is a critical gateway to commerce and economic benefit to the region. It is especially critical to Washington State where one in four jobs is linked to international trade, and for assuring ample, reliable service for our manufactured goods, agriculture, seafood, wood products and other exports. The ocean carrier members of the P3 provide important public benefit to Seattle, King County, Washington State, and beyond. The global market conditions and competition have driven efficiencies in all aspects of the container supply chain. The efficiencies gained through larger vessels, vessel sharing partners, and rationalization of operations enable improved economies of scale, service stability and competitive pricing.

In view of the above, we believe the P3 Alliance is positive for our region and the container shipping industry. We support the P3 Network Vessel Sharing Agreement and kindly request the FMC allow it to enter into effect. Please contact me should you require any further information regarding our support.

Respectfully,

Linda Styrk

Managing Director

Port of Seattle – Seaport

Phone: 206-787-3873



**POS Letter to FMC re P3 VSA .pdf**

114K