

Notation No. 13-98  
December 19, 2013; 12:00 PM



# American Maritime Officers

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OFFICE OF THE SECRETARY  
FEDERAL MARITIME COMMISSION  
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Thomas J. Bethel  
National President

December 4, 2013

Ms. Karen V. Gregory, Secretary  
Federal Maritime Commission  
800 North Capitol Street, N.W.  
Washington, D.C. 20573

Re: P3 Network Vessel Sharing Agreement

Dear Ms. Gregory:

The AMERICAN MARITIME OFFICERS (AMO) is writing to express its support for the P3 Network Vessel Sharing Agreement ("P3").

AMO is the largest maritime officer labor union in the U.S. Our membership of over 3,000 licensed engineers and deck officers serve aboard U.S.-flag seagoing vessels, ferries, LNG and government-contracted ships. They are also highly-trained and experienced in all areas of inland waterways shipping, serving on U.S.-flag tugs and barges, Great Lakes vessels and in various capacities in the maritime related shore-side industries.

AMO is interested in ensuring that the number of U.S.-flag vessels deployed in the foreign commerce will not be reduced and in promoting the availability of efficient U.S.-flag vessel capacity to the shipping public. These interests are consistent with key elements of the Shipping Act of 1984, as amended, which encourages the development of an economically sound and efficient fleet of U.S.-flag vessels.

It is our understanding that the P3 Network Vessel Sharing Agreement will enhance U.S.-flag service and related jobs, and is expected to result in renewed investment and upgrades in the size and efficiency of U.S.-flag vessels deployed. This will benefit U.S. importers and exporters, the U.S.-flag merchant marine and U.S. national interests by ensuring that efficient, world-class vessels are operated in commercial service under the U.S. flag.

We see no evidence that P3 will reduce service in the U.S. trades or otherwise be detrimental to AMO, or to U.S. shippers dependent on U.S.-flag vessels to move their cargo. Indeed, as noted above, we believe it will have a positive impact on both AMO members and the U.S. shipping public via improved service operations and greater efficiency.

Accordingly, we encourage the Federal Maritime Commission not to delay the entry into effect of the P3 Network Vessel Sharing Agreement.

Sincerely,

Thomas J. Bethel, National President  
American Maritime Officers

TJB:jgb



BILL CLEMENT  
VICE PRESIDENT, INTERMODAL

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November 26, 2013

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

RE: FMC accepting public comments on P3

Dear Secretary Gregory:

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

As one of the nation's leading transportation suppliers, CSX Transportation (CSXT) provides both traditional rail service and the transport of intermodal containers and trailers to shippers. Steamship lines, including the proposed P3 members, are heavy users of the intermodal rail product to deliver inland import goods and originate inland exports. CSXT Intermodal, along with other key players in the intermodal rail industry, continues to invest for growth to facilitate the efficient and environmentally-friendly movement of intermodal goods on land that support increasingly global supply chains.

The P3 is positive for CSX Transportation and the container shipping industry overall because it provides:

- Increased productivity and efficiencies for the steamship line carriers, providing a more stable, sustainable transportation partner for the rail carriers
- Greater port coverage for shippers, expanding the services the intermodal rail industry can offer
- Improved overall service stability for shippers, including more frequent, consistent and competitive transit times

I support P3 as a positive step for the industry and my business.

Thank you,

Bill Clement

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OFFICE OF THE SECRETARY  
FEDERAL MARITIME COMM

Monday, November 25, 2013

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 support for the development and implementation of the proposed P3 Network.

As a shipper moving 1500 FFE per year of books, toys, gifts, games & electronics, I certainly appreciate the opportunity to comment.

I see the P3 as potentially positive for my company and the container shipping industry overall because it provides:

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

I support P3 as a positive step for the industry and my business.

Thank you,



Angelo Ventrone  
Vice President, Global Logistics



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FEDERAL MARITIME COMMISSION

**Curtis J. Foltz**  
Executive Director

Email: cfoltz@gaports.com  
Call Direct: 912.964.3874  
Fax: 912.966.3615

Wednesday, December 04, 2013

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 support for the development and implementation of the proposed P3 Network.

As a major terminal operator handling approximately 3 million TEUs annually, we see the P3 as being potentially positive for the container shipping industry overall because it stands to provide:

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

I support P3 as a positive step for the industry and economic development.

Thank you,

Curtis J. Foltz  
Executive Director