

From: "Hunziker, Robin M." <RMHunziker@MAPLLC.com>
To: FMC.Maritime(secretary)
Date: Mon, Jul 16, 2001 10:46 AM
Subject: Docket No. 01-08

The Federal Maritime Commission (FMC) has issued a Notice of Inquiry <<http://www.fmc.gov/Dockets/01-08Inquiry.htm>> to solicit information and comments concerning the impact of the Government Paperwork Elimination Act (GPEA) and the Electronic Signatures in Global and National Commerce Act (E-SIGN) on all sectors of the U.S. ocean shipping industry. My comments are below and attached.

2. Yes, Marathon Ashland Petroleum and Marathon Oil Company uses electronic signature technology as of its business activities. The context is wherever an adequate return on investment is present, which is found in most cases. Purchasing has been a primary use, but the potential range is very broad.
3. Yes, the companies are very familiar with and currently use Public Key Infrastructure ("PKI") and Automated Certificates of Electronic Signature.
4. Anticipated benefits include reduced administrative costs, increased reliability of data transfer, increased security, and improved regulatory oversight.
5. If PKI and certificates are properly set up by FMC and adequate ongoing oversight occurs, risks should decrease rather than increase.
6. Inertia and fear of the unknown are the primary obstacles which would impede FMC's successful establishment of electronic options. FMC should impose administrative fees on paper-based filing that appropriate represent FMC's cost differential.
7. Per responses to questions 4 and 5 above, the companies encourage FMC's implementation of electronic submission.
8. I recommend that the FMC define an XML Schema standard for the data structure of each form and information collection submitted to the FMC.
See

<<http://xml.gov>>,
<<http://users.erols.com/ambur/RMmetadata.htm>>, and
<<http://www.w3.org/XML/Activity>>

for more information. An example is provided by the Federal Motor Carrier Safety Administration Commercial Vehicle Information Systems and Networks (CVISN) Program at
<http://www.jhuapl.edu/cvisn/downdocs/edi_xml.html>.



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July 16, 2001

Bryant L. VanBrakle, Secretary
Federal Maritime Commission
800 North Capitol St., N.W., Room 1046
Washington, D.C. 20573-0001

Re: Notice of Inquiry, Docket No. 01-08

Dear Mr. VanBrakle:

The Federal Maritime Commission (FMC) has issued a Notice of Inquiry <<http://www.fmc.gov/Dockets/01-08Inquiry.htm>> to solicit information and comments concerning the impact of the Government Paperwork Elimination Act (GPEA) and the Electronic Signatures in Global and National Commerce Act (E-SIGN) on all sectors of the U.S. ocean shipping industry.

I am an electrical engineer and attorney employed by a corporate consumer of maritime transportation services.

2. Yes, Marathon Ashland Petroleum and Marathon Oil Company use electronic signature technology as of their business activities. Such technologies are used wherever an adequate return on investment is present, which is found in most cases. Purchasing has been a primary use, but the potential range is very broad.

3. Yes, the companies are very familiar with and currently use Public Key Infrastructure ("PKI") and Automated Certificates of Electronic Signature.

4. Anticipated benefits include reduced administrative costs, increased reliability of data transfer, increased security, and improved regulatory oversight.

5. If PKI and certificates are properly set up by FMC and adequate ongoing oversight occurs, risks should decrease rather than increase.

6. Inertia and fear of the unknown are the primary obstacles which would impede FMC's successful establishment of electronic options. FMC should impose administrative fees on paper-based filing that appropriate represent FMC's cost differential for receiving, transcribing and maintaining data in paper format.

7. Per responses to questions 4 and 5 above, the companies encourage FMC's implementation of electronic submission.

8. FMC should define an XML Schema standard for the data structure of each form and information collection submitted to the FMC. See

<<http://xml.gov>>,
<<http://users.erols.com/ambur/RMmetadata.htm>>, and
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for more information. An example is provided by the Federal Motor Carrier Safety Administration Commercial Vehicle Information Systems and Networks (CVISN) Program at <http://www.jhuapl.edu/cvisn/downdocs/edi_xml.html>.

Sincerely,

Robin M. Hunziker