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**To:** <secretary@fmc.gov>  
**Date:** Fri, May 30, 2003 1:58 PM  
**Subject:** fmc docket 02-15

Attn Bryant L. VanBrakle, Secretary  
Federal Maritime Commission  
800 North Capitol Street, N.W., Room 1046  
Washington, DC 20573-0001

We agree with all the follow statements and this proposed rule change does much more harm than good:

-- We depend on a healthy and growing cruise industry for a large share of our business. This is vitally important as airlines and other segments of the travel business rely on travel agents less and less. One of the bright spots in our business is the growth and expanding vacation opportunities in the cruise industry.

-- Both the cruise lines and the travel agents understand that keeping cruise customers happy is essential to the business. We often go above and beyond what we're legally required to do in order to keep a customer happy. No government agency requires this -- it's just good business sense.

-- It would likely cost the cruise lines a lot of money to change the way they handle passenger deposits. Such a cost would not be justified if the purpose is to make sure they provide the cruises they promise. Cruiselines already do this to keep their customers happy.

-- If the idea is to make sure that passenger deposits are protected if a cruise line stops operating, such a rule makes some sense but only for operators who have one or a few older ships. But it is almost impossible to imagine how the large, established cruise lines would stop operating. They have too much invested in the ships and the business to just stop operating.

-- Changes in rules that hurt the cruise industry also hurt the travel agent business. Ultimately, added costs are passed along to the customer, making it more expensive to take a cruise. We strongly oppose rules changes that add unnecessary costs to the cruise industry. We are also very strongly opposed to changes that unnecessarily add to our administrative costs in complying with various government rules.

-- Almost no cruise customers buy insurance against the possibility that the passenger will lose its money because a cruise line stops operating. We do not support having the FMC require the cruise lines themselves to, in effect, buy such insurance by setting aside customer deposits except to the extent needed to keep unscrupulous operators out of the business.

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