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International Tank Container Organisation (I.T.C.O.)
C/o 1-5 Oldchurch Road
Romford
Essex RM7 OBQ
United Kingdom

Dear Sirs,

Ref: Petition No. P5-03

“Petition of the National Customs Brokers and Forwarders Association of America Inc. for Limited exemption from certain tariff requirements of the Shipping Act of 1984”.

I.T.C.O., the International Tank Container Organisation is a non profit trade organisation representing the interests of the international tank container community to industry, the public and to government bodies. A number of our members operate tank containers into and out of the United States and are not containership owners, therefore qualify as NVOCC's.

Our members are unanimous in their support of the petition to end the Tariff publishing rules applicable to NVOCC's for the following reasons:-

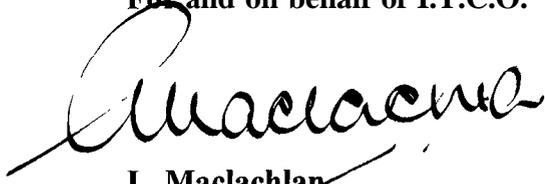
1. the general nature of the tariff filing is obsolete and bears little resemblance to individually negotiated contracts.
2. The FMC has been encouraging more competitive individually negotiated contracts.
3. The administration costs associated with the filing exercise are expensive and hinder the ability of many NVOCC's to compete fully and fairly particularly in the Tank Container industry where margins continue to be eroded.
4. NVOCC's including tank container operators are not favoured anti-trust immunity and are not in a position to defend discrimination against shippers but are still subject to enormous penalties for tariff violations which involve no consumer injury.

5. I.T.C.O., along with other representative bodies encourages reduced bureaucracy enabling our members to reduce their overheads and pass these benefits to the consumer and thereby fulfil one of our industry objectives being

“The worldwide promotion and development of the Tank Container Industry”.

We support this petition and ask you to take our views into consideration when deliberating upon your findings.

For and on behalf of I.T.C.O.

A handwritten signature in black ink, appearing to read 'L. Maclachlan', written over a horizontal line.

L. Maclachlan
Vice President