Secretary
Federal Maritime Commission
800 North Capitol Street, NW
Washington, D.C. 20573-0001
Via Email to: Secretary@fmc.gov
Re: Comments for FMC Docket No. 17-10 Amendments governing Negotiated Rate Arrangements (NRAs)
These comments are offered in response to the above docket under consideration for changes to Negotiated Rate Arrangements.

Our company is a regular purchaser of ocean freight services from our NVOCCs whom we have a relationship with and have accepted their way of quoting and doing business with us. The practice of requiring an NRA to be formally accepted by the shipper is an unnecessary step in the process of our shipping and booking procedures. When we receive a quotation we then decide to accept or reject but then the NVOCC is also required to formally present the rate to us in an NRA format and wait for our acceptance before actually booking and receiving the cargo. At the time of the quotation we are ready to accept the rate and any delays or clerical back and forth to formally accept are not productive. In addition it submits our provider (NVOCC) with another burden to be in compliance and does nothing more to protect the shipper.

In addition, there are changes that can happen daily or even more often requiring a new NRA to be sent, accepted and returned before the NVOCC can actually confirm a booking and receive cargo for shipment. These delays can cause considerable expense and loss of time just by missing a day and missing a vessel shipment date. There also should be no reason for the ocean rate to be negotiated in an NRA in addition to the complete services that the provider offers. The preparation of a good quotation and acceptance of the charges associated with a shipment are all that is necessary and in actual practice is all that is required between shipper and carrier.

In our opinion, the publishing of tariffs is an outdated way of providing information that is no longer used and adds to additional expenses for our carriers that could be better served by offering more competitive rates without this clerical burden.

Sincerely Yours,

Allen Lewis
VP, Purchasing & Project Mgt