

Kennedy Lillis Schmidt & English
125 Maiden Lane
New York, N.Y. 10038-4753
Telephone: 212-430-0800
WWW.KLSELAW.COM

Charles E. Schmidt
CSCHMIDT@KLSELAW.COM
DIRECT DIAL: 212-430-0802

June 1, 2022

Federal Maritime Commission
800 North Capitol Street, N.W
Washington, D.C. 20573

Re: Comments on Carrier Automated Tariffs Rulemaking
Docket No. 21-03

Dear Commissioners:

I write to support the proposal to require carriers and conferences to provide free access to tariffs by removing the option to assess a fee for tariff access currently found at 46 CFR 520.9(e)(3).

As an admiralty and transportation practitioner, published tariffs are frequently the only way that terms and conditions of bills of lading can be obtained. In one recent experience, involving an NVOCC whose tariff is published on the Descartes system, it would have been necessary to acquire a minimum 3-month subscription at \$50 per month and pay a per-minute user fee to access the relevant tariff's Rule 8. I would submit this is excessive and defeats the objective of transparency.

Thank you for your consideration.

Very truly yours,

KENNEDY LILLIS SCHMIDT & ENGLISH

By:


Charles E. Schmidt

CES/