

FEDERAL MARITIME COMMISSION

Docket No. 01-08

**THE IMPACT OF THE GOVERNMENT PAPERWORK ELIMINATION ACT
AND THE ELECTRONIC SIGNATURES IN GLOBAL AND NATIONAL
COMMERCE ACT**

**COMMENTS OF HAMBURG SÜDAMERIKANISCHE
DAMPFSCHIFFFAHRTS-GESELLSCHAFT KG D/B/A COLUMBUS
LINE AND D/B/A CROWLEY AMERICAN TRANSPORT AND
ALIANÇA NAVEGAÇÃO E LOGISTICA**

The ocean common carriers identified above (the "Lines"), which can be contacted as set forth on the signature page of these comments, hereby submit their comments in the above-captioned proceeding. Rather than respond to each of the questions posed by the Commission's Notice of Inquiry ("NOI"), the Lines focus on the issues raised by the NOI which are of greatest concern to them and, they believe, of greatest interest to the Commission.

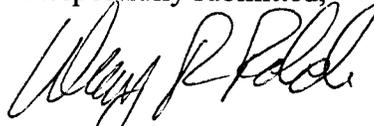
Of the forms identified in the Commission's Notice of Inquiry, the Lines are most frequently required to submit Form FMC-152A, Monitoring Reports for Class A Agreements, due to their membership in several such agreements. The Lines consider this form to be highly sensitive due to the revenue information provided therein.

The Lines presently are not using electronic signatures extensively. Although the Lines would like to make greater use of such signatures, and see no significant risk of the FMC accepting such signatures, the fact remains that electronic signatures have not gained widespread acceptance in those trades where the Lines operate.

For example, the law of many foreign countries does not treat electronic signatures as being equivalent to original, written signatures. In addition, the experience of the Lines has been that banks and P&I Clubs in many jurisdictions are also reluctant or unwilling to treat electronic signatures as being equivalent to original, written signatures.

Although the Lines generally support electronic filing and the use of electronic signatures, they are concerned that electronic signatures will need to gain wider acceptance in the commercial world before regulatory bodies such as the FMC are able to take full advantage of these technological capabilities.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Wayne R. Rohde". The signature is fluid and cursive, written over the typed name.

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