NAVETRANS CORP dba COSTA RICA CARRIERS
Juan R Pardo
Ast. Vice President
5805 Blue Lagoon drive, suite 440
Miami FL. 33126

NAVETRANS CORP dba COSTA RICA CARRIERS is Non Vessel Operating Common Carrier (NVOCC) formed in 1999. We have 11 employees and service over 200 clients in the shipping community. We issue approximately 700 Bills of Lading per year.

We are aware of the UPS/NITL petition and of the tariff exemption petition originally filed by the NCBFAA. It is our position that the proposal by UPS/NITL does nothing to eliminate the cost and burden we currently experience in filing our rates in compliance with the current regulations. We see no reason to file such agreements with the FMC or publish essential terms since this burdensome filing serves no purpose to the shipping community. Today none of our clients access our electronically available tariff nor is there any reason to believe this will change in the future. Our rates are continually changing as many times rates are negotiated on a "spot" basis thus the memorializing of the rates is burdensome, impractical and not useful. Our rates with our clients can be memorialized in written form between the client and the NVO but we would not like to have to file this information with the FMC.

The NCBFAA petition seeking the broad tariff exemption is far more preferable as it eliminates needless expense, permits NVOCC's to be more responsive to the ocean shipping marketplace and the needs of our clients and still permits the FMC to oversee the trade and correct any abuses or malpractices.

I urge the FMC to take prompt action to grant the NCBFAA's petition as soon as possible.

Sincerely,

JUAN R PARDO
Navetrans Corp

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