

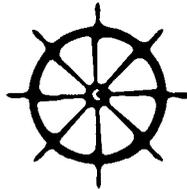
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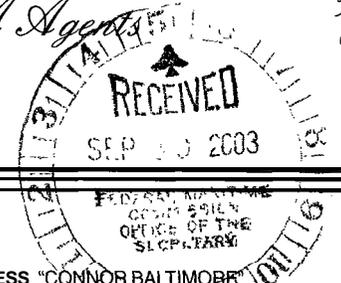
JOHN S. CONNOR, INC.

Customs Brokers - Freight Forwarders - IATA Agents

EST.



1917



Executive Offices:
THE WORLD TRADE CENTER
401 E PRATT STREET
SUITE 700
BALTIMORE, MARYLAND 21202
PHONE (410) 332-4800

CABLE ADDRESS "CONNOR BALTIMORE"
TRT 170914 CONNOR BA
FAX IMPORT - (410) 547-6865
EXPORT - (410) 659-0635

August 19, 2003

Mr. Bryant L Van Brakle
Secretary
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, D.C. 20573

Dear Secretary Brakle:

My name is Lee **Connor**, President of John S. **Connor**, Inc. We are Freight Forwarders, Customs Brokers and Steamship Agents in the Mid-Atlantic Region with our headquarters being in Baltimore. We also operate an NVOCC (JS **Connor** Containerline) with OTI license number 496NF. We work with numerous agents all around the world in order to offer our clients the very best services for their Import/Export transactions. As a licensed NVOCC we have always made it a priority to comply with government regulations including the current tariff requirement in effect.

The requirement for establishing and publishing a tariff on the Internet is an onerous burden in our small margin business. We are one of the exceptions in that we do not use a tariff publishing service because we concluded that this cost would make many of our transactions **non-**compensatory for the work we do. What rankles us most is that the tariff has, in our view, very little value to the shipping public.

The work that our data processing people do to maintain the tariff **website** (not to mention establishing it in the first place) plus the coordination and documentation required in two offices to regularly input tariff changes are **difficult** to calculate. We know it is many hours a month and between the cost of time for our staff and the maintenance by our software vendors we believe it to be in the thousand of dollars per year. The real cost is perhaps in the hours spent which could be better spent elsewhere in developing our business.

We have not been able to find a way to charge for accessing our tariff. We **believe** it could be done but there would be **further** cost to develop this system which are not warranted especially **since** we believe that the only people accessing our tariff are our competitors so they can try to gain an advantage. The tariff system as it currently exists serves only to aid our competition and has no benefit to the shipping public in our view. We are constantly battling a competitive environment where rates are negotiated both with the carriers and also with our clients,

The irony of this situation is that if there were no tariff requirements our cost would be reduced and we could pass on the savings to our clients. We could then operate in a **truly** competitive environment much like we do as airfreight forwarders. We do not see the reason why ocean transportation should be any **different** than air transportation in terms of how pricing is set. The fact that rates are confidential and negotiated with carriers and customers in the airfreight arena has not been shown to be a detriment to the shipping public. The elimination of published **tariffs** would go a long way in assisting the promotion of international ocean transportation.

I, Lee **Connor** declare under penalty of perjury that the **foregoing** is true and correct. Further I certify that I am qualified and authorized to file this verified statement.

Yours truly,
JOHN S. **CONNOR**, INC.



Lee Connor
President

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Enclosures