

## Magdalene Grant

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**From:** Secretary  
**Sent:** Wednesday, September 24, 2008 12:25 PM  
**To:** Karen Gregory; Magdalene Grant  
**Subject:** FW: FMC Seeks Comments on Tariff Exemption Petition  
**Attachments:** BEFORE THE FEDERAL MARITIME COMMISSION.doc

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**From:** Kathy Williams [mailto:kathy@alphasunintl.com]  
**Sent:** Wednesday, September 24, 2008 8:16 AM  
**To:** Secretary  
**Subject:** FMC Seeks Comments on Tariff Exemption Petition

To Whom it may concern

Attached is my comment in reference to the Tariff Exemption for Ocean shipment

Thank you for the opportunity to respond

Best Regards,

Kathy Williams  
CFO/VP Exports  
Alpha Sun International Inc  
5300 Kennedy Rd Suite C  
Forest Park GA 30297  
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BEFORE THE FEDERAL MARITIME COMMISSION

WASHINGTON, D.C.

PETITION OF NATIONAL CUSTOMS BROKERS AND FORWARDERS

ASSOCIATION OF AMERICA FOR EXEMPTION

FROM MANDATORY RATE TARIFF PUBLICATION

DOCKET NO. P1-08

VERIFIED SUPPORTING STATEMENT OF KATHY WILLIAMS

I am Kathy Williams V.P. of Exports for Alpha Sun International Inc

We are a Customs Broker, Freight Forwarder and OTI (#020581) with an office located in Forest Park GA. We also have many agents located all over the world.

As an active member of the NCBFAA we are very familiar with the issues relating to the rules for mandatory publication of ocean rate tariffs and we are supporting the Association's petition to exempt NVOCCs, from having to post our negotiated rates with our shippers to the public.

We have contracted with an outside firm to handle the tariff filings. Because the market is changing almost daily it is almost impossible to keep up with the constant changing of the rates in the system. Even if we have a service contract with the steamship line most of the negotiated rates are on a spot or bullet rate; as a result NVOCC costs vary frequently and so the rates we file will vary frequently even for the same commodity under the same trade lane. My shippers want their rates in an e mail format only they do not want to be confused by trying to log onto a site that is changing daily. In the last 14 years of handling exports I have never had a shipper request access to my public tariffs.

Also the added expense to have and maintain this service does not see to be cost effective since there is no way I can track and see if anyone is even using this to check rates. In my 14 years of filing rates I have never had a call from anyone. In order to have the filing system it cost my company 195.00 to set up the tariff, 450.00 per year to maintain the site and then an additional 3.25 for any change or addition made for rates. This is only an added expense and neither my company nor my customers get any benefit from this.

I Kathy Williams 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

Executed on September 20, 2008

Kathy Williams

V.P. Exports

Alpha Sun International Inc

FMC# 020581