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FEDERAL MARITIME COMM

William N. Myhre
billm@prestongates.com
202-662-8422

May 28, 2003

Mr. Bryant L. VanBrakle
Secretary
Federal Maritime Commission
800 North Capitol Street, N.W., Room 1046
Washington, DC 20573-0001

Re: Passenger Vessel Financial Responsibility Proposed Rulemaking
Docket No. 02-15
Request by Norwegian Cruise Line to Participate in Public Hearing

Dear Mr. VanBrakle:

We are writing on behalf of Norwegian Cruise Line ("NCL") pursuant to the Notice of Public Hearing Date, issued by the Commission on May 6, 2003 (68 Fed. Reg. 23947), to provide notice that the following individual wishes to testify on behalf of NCL at the hearing to be held on June 11, 2003:

Robert M. Kritzman
Senior Vice President and General Counsel
Norwegian Cruise Line
7665 Corporate Center Drive
Miami, Florida 33126
(305) 436-4000
rkritzman@ncl.com

Norwegian Cruise Line is committed to the protection of its passengers and shares the Commission's concern that passenger vessel operators provide adequate evidence of financial responsibility before offering cruises to the public. The Commission's existing rules, including the maintenance of a ceiling on required coverage, have worked well over the past 35 years to achieve that objective. The proposed elimination of the coverage ceiling, however, would reverse long-standing Commission policy and practice with detrimental effects on cruise lines and their passengers.

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Before reversing its policies, the Commission is required to undertake a reasoned analysis of the need for the change and the consequences if adopted. This has not been done. Other provisions of the proposal, including the mandatory alternative dispute resolution system, are also without jurisdiction and unwarranted. NCL believes the proposed rulemaking raises serious legal and policy questions, does not adequately address the costs and the benefits of the proposed change, is not necessary, and fails to achieve the appropriate balance among the affected parties. Accordingly NCL strongly objects to adoption of the proposed rule in its current form.

On behalf of the company, we appreciate the opportunity to testify before the Commission on this matter.

Very truly yours,

PRESTON GATES ELLIS
& ROUVELAS MEEDS LLP

By 
William N. Myhre