INTERPORT SERVICES

P.O. Box 226257
Miami, FL 33122-6257
Tel: (305) 477-1910
Fax: (305) 477-6776
FMC LIC. 18381NF

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OFFICE OF THE SECRETARY
FEDERAL MARITIME COMM

September 28th 2004

Federal Maritime Commission
Washington DC 20573-0001

Interport Services is a non-Vessel Operating Common Carrier (NVOCC) formed in 2003. At the moment we do have 4 employees and service about 45 clients in the shipping community. We issue approximately 500 Bills of Lading per year.

We are aware hat the UPS/NITL petition, and of the Tariff exception petition 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 current regulations. We see no reason to file such agreements with the FMC or publish essential terms since this burdensome filing serve no purpose to the shipping community, including our customers. 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 as rates are negotiated on a "spot" basis, thus the memorializing of the rates is burdensome, impractical and not useful. Our rates to our clients can memorialize in written form, either via fax or e-mail between the clients and the NVOCC, but we would not like 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 the NVOCC to be more responsive to the Ocean Shipping marketplace and the need of our clients and still permits the FMC to oversee the trade and correct any abuses and malpractices.

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

Sincerely,

INTERPORT SERVICES CORP.

Alberto J. Marino
President