RECEIVED
04 OCT 12 PM 2:31
FEDERAL MARITIME COMM

REILLY TRANSPORTATION SERVICES INC

Reilly Transportation Services Inc
Dante F. Versaci II
VP, Imports
3401 NW 82nd Avenue #106
Miami, Fl 33122

Reilly Transportation Services Inc is a licensed Customs Broker who uses Non Vessel Operating Common Carriers (NVOCC).

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 to our NVOCC friends experience in filing their 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 we do not access our NVOCC's electronically available tariff nor is there any reason to believe this will change in the future. Their 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. Their 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,
Reilly Transportation Services, Inc

Dante F. Versaci II
VP, Imports

DFV/kd

3401 NW 82ND Avenue Suite 106 Miami, FL33122
TEL: 305.513.9540 FAX: 305.513.0579 Toll Free 888.464.5459