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ORIGINAL
SECRETARY
FEDERAL MARITIME COMM

October 8, 2003

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

RE: Petition of National Customs Brokers and Forwarders
Association of America, Inc. for a Limited Exemption Form
Certain Tariff Requirements of the Shipping Act of 1984.

Petition No. 05-03

Dear Secretary Van Brakle:

I am William S. App Jr., President of J. W. Allen and Co. Inc. For your ready reference our NVOCC License FMC 67NF. Because the NVOCC portion of our business is the smallest profit center, I was hesitant to take the time to send a letter to support our associations petition. However, when I gave it more thought I was reminded that all of the money we spend on tariff filing is wasteful, as the rates, once filed are never referenced or used again.

Our rates are filed through Pacific Coast Tariff Bureau and our annual cost is:

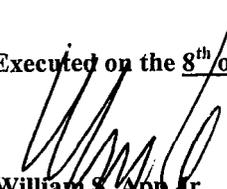
- ◆ Annual Retainer \$ 500.00
- ◆ Monthly Fee (\$79.00 x 12 months) \$ 948.00
- ◆ Individual Filing (10 x \$15.00/month) \$1,800.00
- ◆ Personnel Cost (10 hours monthly @ \$50.00 hour) \$6,000.00

A little less than \$10,000.00 annually expense for a small company is a lot. J. W. Allen and Company has been in business for over 70 years, and has always cooperated and supported our industry and our regulator, the FMC. I must reiterate that the end product of this expense serves no purpose, and I would prefer to proportionately pass any savings from tariff reform to our customers.

Thank you for taking the time to listen.

I, William S. App Jr., 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 the 8th of October 2003


William S. App Jr.
President