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OFFICE OF THE SECRETARY
FEDERAL MARITIME COMM**BY HAND DELIVERY**

The Honorable Bryant L. VanBrakle, Secretary
Federal Maritime Commission
800 North Capitol Street, NW, Room 1046
Washington, DC 20573-0001

Re: Docket No. P3-99, Petition of China Ocean Shipping (Group) Company
Docket No. P4-03, Petition of China Shipping Container Lines Co., Ltd.
Docket No. P6-03, Petition of Sinotrans Container Lines Co., Ltd.

Dear Mr. VanBrakle:

American President Lines, Ltd. ("APL") hereby comments on the above-referenced petitions pursuant to the Commission's Notice of January 22, 2004, published in the *Federal Register* of January 28, 2004 (69 Fed. Reg. 4158-4160).

As the Commission's January 22, 2004 Notice identifies, the United States and the People's Republic of China ("China") have recently entered into an Agreement on Maritime Transport ("Agreement") providing certain reciprocal rights, *infer alia*, with respect to vessels and shipping companies of each of the two parties to the Agreement. In particular, the Annex to the Agreement grants to shipping companies and container transport service companies of each of the parties to the Agreement certain rights to conduct business in the territories of the other party.

APL has previously filed comments in each of the referenced dockets. The purpose of APL's current comments is to identify the status of APL's and APL Logistics' ("APLL") applications to the Government of China to be permitted to engage in the business activities authorized in the Annex. APL and APLL have applied, or are about to apply, to make their existing Liner License and Container Services Company License fully coextensive with the authority to engage in the business activities identified in the Annex. They also have applied to establish branch offices in a number of cities in China, or to convert existing "liaison" offices to branch offices. A number of these applications have been granted, and we are encouraged to believe that the remainder will be granted in the near future. We note, however, with respect to the application by APL to amend its existing Liner License to add authority to perform vessel agency services and to conduct multimodal or combined transport activities and own vehicles and other equipment necessary to APL Operations, that APL has been verbally informed that favorable action will not be taken by the Government of China until the Commission acts favorably on the petitions by the Chinese carriers in the captioned dockets. Operating on the premise that the APL applications will be approved, we do not object to a Commission grant of the captioned petitions.

Sincerely,

Eric L. Mensing
Vice President, Government Markets &
Government Affairs

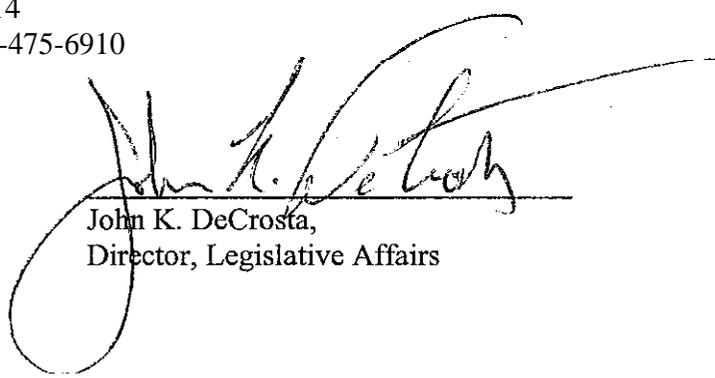
CERTIFICATE OF SERVICE

I certify that I have this 23rd day of February, 2004, served the foregoing Comments of American President Lines, Ltd. on Petitioners by telecopier and first class mail, addressed to Petitioners' counsel as follows:

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