AMERICAN MARITIME CONGRESS
Franklin Square, 1300 I Street, NW, Suite 250 West, Washington, DC 20005-3314

January 9, 2006

Director
Commodity Procurement Policy &
Analysis Division
Farm Service Agency
United States Department of
Agriculture (USDA)
Room 5755-S
1400 Independence Avenue, SW
Washington, DC 20250-0512

Attention: Mr. Richard Chavez

Re: 7 CFR Part 1496, Procurement of Commodities for Foreign Donation
Proposed Rule

Dear Mr. Chavez:

Would you kindly note that the letter we sent earlier today requesting an extension of the comment period should list the Transportation Institute, which, like the American Maritime Congress and the Maritime Institute for Research and Industrial Development, is a Washington-based association representing U.S-flag ship operating companies in the international and domestic trades which transport commodities overseas under Title II of P.L. 480; the Food for Progress Act of 1985; and the McGovern-Dole International Food for Education and Child Nutrition Program.

Thank you for accepting this addendum as part of the record.

Sincerely,

Gloria Cataneo Tosi

Gloria Cataneo Tosi
President

Phone: (202) 842-4900 Fax: (202) 842-3492

AMERICAN MARITIME CONGRESS
Franklin Square, 1300 I Street, NW, Suite 250 West, Washington, DC 20005-3314

January 9, 2006

Director
Commodity Procurement Policy &
Analysis Division
Farm Service Agency
United States Department of
Agriculture (USDA)
Room 5755-S
1400 Independence Avenue, SW
Washington, DC 20250-0512

Attention: Mr. Richard Chavez

Re: 7 CFR Part 1496, Procurement of Commodities for Foreign Donation
Proposed Rule

Dear Mr. Chavez:

On behalf of the American Maritime Congress, and the Maritime Institute for Research and Industrial Development, which are Washington-based associations representing U.S.-flag ship operating companies in the international and domestic trades, I am writing to request a formal extension of 45 days of the comment period on this Proposed Rule from the current deadline of January 17, 2006. Both we and our member companies believe that this Proposed Rule raises a number of complex and important considerations that could affect U.S.-flag shipping and cargoes available to the U.S. flag as prescribed under applicable, longstanding cargo preference law and policy. In addition, as I know you appreciate, these cargoes also have significant national defense implications because of their importance to ready, reliable sealift and crews for both U.S. Government-owned and dedicated private-sector capabilities.

I am also writing to request that your office convene a working session as soon as possible with our member U.S.-flag ship operating companies as well as other affected parties in the maritime industry for the purpose of learning more and exchanging ideas about how your office envisages that this Proposed Rule would work, potential savings, its effect on U.S.-flag liner and bulk carriers and compliance with the cargo preference laws, as well as the vital American seafaring jobs that go with them, and other issues.

We fully realize the importance of improving cargo delivery and reducing expenses where possible, consistent with cargo preference law and policy. We have, in fact, worked in the past to this end with USDA, USAID, MARAD, and other departments

Phone: (202) 842-4900 Fax: (202) 842-3492

and agencies as well. Thus, we view both our request for a 45-day comment period extension and a working session as an important opportunity for the kind of constructive engagement and partnership that has proven beneficial in the past and which we believe can also be obtained in the process of developing and finalizing this Proposed Rule, which could have a significant impact on the cargo preference laws.

We thank you for your consideration of these requests and look forward to hearing from you as soon as possible. My telephone number is 202-842-4900, ext. 301, if you need to reach me.

Sincerely yours,

Gloria Cataneo Tosi

Gloria Cataneo Tosi
President

cc: Ms. Teresa C. Lasseter, USDA
Mr. Bert Farrish, USDA
Ms. Denise Scherl, USAID