

UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530

AMENDMENT TO REGISTRATION STATEMENT

Pursuant to the Foreign Agents  
Registration Act of 1938, as amended.

REGISTRATION UNIT  
INTERNAL SECURITY  
SECTION  
CRIMINAL DIVISION

1. Name of Registrant New York Committee of INTERNATIONAL COMMITTEE OF PASSENGER LINES, Vincent A. Demo, Chairman	2. Registration No.  2036
--	---------------------------------

3. This amendment is filed to accomplish the following indicated purpose or purposes:

- To correct a deficiency in
  - Initial Statement
  - Supplemental Statement for July 25, 1973
  - To give notice of change in an exhibit previously filed.
- To give a 10-day notice of a change in information as required by Section 2(b) of the Act.
- Other purpose (specify) \_\_\_\_\_

4. If this amendment requires the filing of a document or documents, please list -

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. If more space is needed, full size insert sheets may be used.

- Section V**
- Item 16 - Yes
  - Item 17 - See list attached to statement in answer to Section II - Item 10
  - Item 18 - Yes - answered Section IV - Item 14(a)
  - Item 19 - "Letters or telegrams"
  - Item 20 - Government agencies
  - Item 21 - English
  - Item 22 - Yes
  - Item 23 - Yes
  - Item 24 - Yes

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this amendment and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief.

(Both copies of this amendment shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Vincent A. Demo  
\_\_\_\_\_

Subscribed and sworn to before me at New York, N. Y.

this 14<sup>th</sup> day of January, 1974

My commission expires 3-30-75

Nancy Gross  
(Notary or other officer)  
NANCY GROSS  
Notary Public, State of New York  
No. 4510452  
Qualified in New York County  
Commission Expires March 30, 1975

# INTERNATIONAL COMMITTEE OF PASSENGER LINES

30-32 St. Mary Axe, London, E. C. 3, England

RECEIVED

JAN 16 1 44 AM '74

## NEW YORK COMMITTEE

25 BROADWAY  
NEW YORK, N.Y. 10004  
TELEPHONE: 212 269-2822

CHAIRMAN: VINCENT A. DEMO

REGISTRATION UNIT  
INTERNAL SECURITY  
SECTION  
CRIMINAL DIVISION

March 30, 1973

Commissioner of Customs  
Attention: Regulations Division  
Washington, D. C. 20226

Dear Sir:

On February 13, 1973, I submitted comments on the proposed amendment to 19 C.F.R. 4.80a as promulgated in the Federal Register of December 20, 1972, in my capacity as agent, registered with the Department of Justice under the Foreign Agents Registration Act, for the New York Committee, International Committee of Passenger Lines, which comprises 19 foreign passenger Lines calling at United States ports.

In the interim, we have had an opportunity to review most of the comments submitted to you by the many interested parties in the United States. These are most interesting and emphasize the many practical reasons for interpreting the coast-wise statute so as not to impose unrealistic restrictions upon cruise operations from United States ports.

The comments submitted by the various State authorities establish beyond doubt the important contribution made by these cruises to the economies of the American ports where the voyages originate and terminate, as well as to those of the intermediate American ports of call. The Alaskan interests have emphasized that the number of passengers on cruises to Alaskan ports had doubled between 1968 and 1972 and that even further increases are projected for the future. Tourism during the short cruising season to Alaskan ports represents millions of dollars to the economy of Alaska and, as indicated by the Department of Economic Development for the State of Alaska, "the cruise ship tourism to Alaska represents a major portion of the total industry."

The comments submitted by The American Society of Travel Agents, as well as by individual agents, highlight the increasing demand for ocean pleasure cruises and the lack of existing American-flag passenger service to meet that demand. ASTA has estimated that the cancellation of only one foreign operator's projected 1973 cruises from the West Coast to Hawaii resulted in a loss of some \$2.5 million in commissions which would otherwise have been payable to American travel agents.

The comments submitted by individuals bear witness to the American passengers' desire to visit places of touristic interest within their own country when these can be combined with ocean cruises to foreign ports. Yet, at the present time, no American-flag passenger vessel operates cruises out of United States East Coast ports, and the proposed reactivation of the S.S. Independence for that purpose has recently been abandoned. On the Pacific coast, the only American-flag cruise service is that provided by two vessels of the Pacific Far East Line, each of which has a limited capacity of 350 and, between them, employ approximately 540 crew members. They do not even begin to meet the demand for regular cruises to Hawaii, much less to Alaska since, for a part of the year, they cruise to South Pacific and other non-domestic areas. As pointed out in our February 13, 1973 comments, the single United States-flag vessel scheduled to provide five cruises to Alaska from California ports in 1973 offers only 1,750 berths as opposed to over 40,000 berths on nine foreign-flag vessels. In spite of this difference in availabilities, the PFEL vessels, we gather, are regularly sold out to capacity which only further emphasizes the extent of this tourist interest by the American public.

We submit that, at this period when the United States public must depend upon foreign-flag vessels to meet the demand for cruising, a minimum of restrictions should be imposed so that the public may have the maximum opportunity, while on foreign voyages, to visit and become acquainted with tourist facilities in the United States as well. This would implement the "Visit America" program under which heavy expenditures are being made abroad by the United States Government for the purpose of encouraging tourism to the United States.

The "primary purpose" of the voyage should, therefore, reflect the basic distinction between transportation and cruising. This fundamental distinction highlights the inherent unreasonableness of characterizing the primary object of the voyage on the basis of a purely arithmetic ratio of domestic versus foreign ports - or of the time spent in such ports. Mechanical application of this criterion would, in many instances, mean the substitution of a foreign port of call for an American one. This is because the scheduling of short pleasure cruises is necessarily related to the length of the passengers' vacation periods - a timing which does not readily permit ports to be added or eliminated in accordance with the proposed foreign versus domestic port formula. Even more importantly, this formula could force foreign cruise lines to transfer their bases of operations entirely from domestic to foreign ports; this is feasible in view of present developments in group transportation by air on the fly/cruise concept.

March 30, 1973

In both instances, the ultimate result would be to deprive the affected United States ports of the various and important contributions which cruise operations now make to their respective economies - not overlooking the benefits to longshore labor.

As previously pointed out, if the full benefits of cruise voyages are to be enjoyed by all United States interests, the time, distance and relative cost of a pleasure cruise - as compared to the cost of "transportation" from the same port of embarkation to any coastwise port of call - are far more significant factors than the criteria set forth in subparagraph d(1) of the proposed amendment.

Respectfully submitted,

NEW YORK COMMITTEE,  
INTERNATIONAL COMMITTEE OF PASSENGER LINES



Vincent A. Demo  
Chairman

VAD:d