

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

SUPPLEMENTAL STATEMENT

*Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended*

For Six Month Period Ending 25 JAN 1972
(Insert date)

Name of Registrant Registration No. 2036
New York Committee of INTERNATIONAL COMMITTEE OF PASSENGER LINES
Vincent A. Demo, Chairman
Business Address of Registrant
25 Broadway, New York, N.Y. 10004

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name	Position	Date Connection Ended
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4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes No

If yes, identify each such person and describe his services.

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6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?
Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?
Yes No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name of foreign principal

Date of Termination

Canadian Pacific Ships

January 1, 1972

9. Have you acquired any new foreign principal¹ during this 6 month reporting period?

Yes No

If yes, furnish following information:

Name and address of foreign principal

Date acquired

Royal Caribbean Cruise Line, Inc.

October 8, 1971

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

(list of seventeen steamship lines is attached.)

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9 and 10 of this statement? Yes No

If yes, identify each such foreign principal and describe in full detail your activities and services:

Registrant has kept all of its principals advised of regulations issued or to be issued under PL 89-777 and PL 91-224 and possible amendments of these statutes; state laws and regulations concerning pollution of navigable waters; possible restrictions on rights of foreign vessels to stop over in U.S. ports; possible sale of American flag vessels; bills to regulate travel agencies and set control of passenger fares.

These developments have been discussed at meetings attended by New York representatives of the foreign principals.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The only "political activity" engaged in by registrant has consisted of occasional visits to and/or correspondence with members of Congress and representatives of the U.S. Coast Guard, Federal Maritime Commission, Environmental Protection Agency, State Department and U.S. Customs Bureau in connection with matters referred to in answer to question 11.

Attached hereto are copies of letters or statements to the Federal Maritime Commission (Docket 71-22); Senator Inouye (Bill S. 2577); Senator Magnuson (Bill s. 2754); Congressman Blatnik regarding PL 91-224.

Visits have otherwise been periodic personal calls on the House and Senate Committees, FMC and State Department to maintain contacts in order to learn of developing situations that might affect passenger shipping. Visits to the Coast Guard and EPA involved requirements for sewage and oil pollution controls from vessels.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes No

If yes, describe fully.

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
July 25, '71 to Jan. 25, '72	17 Steamship Lines	Operating Expenses	\$1,100 each
	1 Steamship Line	"	\$2,950

\$21,650.00
Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes No

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date Received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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Expenditures July 25, 1971 - January 25, 1972.

Salaries	\$16,130.00
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Office Supplies, Rent, Phones, Postage, Cables, Xeroxing, Taxes, Insurances, etc.	11,600.00
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Miscellaneous Travelling and related expenses (fares, meals, transportation, etc.), entertainment	3,900.00
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TOTAL	\$31,630.00
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All of these monies were disbursed on behalf of all of the foreign principals jointly shown in reply to question 10.

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes No

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes No

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes No

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?

Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

- Radio or TV broadcasts
- Magazine or newspaper articles
- Motion picture films
- Letters or telegrams
- Advertising campaigns
- Press releases
- Pamphlets or other publications
- Lectures or speeches
- Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

- Public Officials
- Newspapers
- Libraries
- Legislators
- Editors
- Educational institutions
- Government agencies
- Civic groups or associations
- Nationality groups
- Other (specify) _____

21. What language was used in this political propaganda:

- English
- Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes No

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes No

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes No

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

- Exhibit A⁶ Yes No
- Exhibit B⁷ Yes No

If no, please attach the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach the required amendment.

(No amendments were applicable or filed for the period indicated.)

⁶ The Exhibit A, which is filed on Form DJ-306, sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form DJ-304, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. **EXHIBIT C**

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period.

Yes No

If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

27. **SHORT FORM REGISTRATION STATEMENT**

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes No **INAPPLICABLE** - No such persons named in items 5 & 7.
If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits 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, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement 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

Vincent A. Demo

Subscribed and sworn to before me at New York

this 7th day of February, 19 72

John S. Rogee

(Signature of notary or other officer)

JOHN S. ROGEE
Notary Public, State of New York
No. 31-3327225
Qualified in New York County
Commission Expires March 30, 1974

My commission expires March 31, 19 74

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Internal Security Division, Department of Justice, Washington, D.C. 20530.)

Members of NEW YORK COMMITTEE
of the
INTERNATIONAL COMMITTEE OF PASSENGER LINES

CHANDRIS AMERICA LINES INC.

COSTA LINE, INC.

CUNARD LINE LIMITED

FRENCH LINE

~~GERMAN ATLANTIC LINE~~ 12-1-73^T

GREEK LINE, INC.

~~HAPAG LLOYD AG~~ 6-30-74^T

HOLLAND AMERICA LINE

HOME LINES INC.

INCRES LINE

ITALIAN LINE

NORWEGIAN AMERICA LINE

PAQUET LINES

P & O LINES INC.

ROYAL CARIBBEAN CRUISE LINE, INC.

SUN LINE

SWEDISH AMERICAN LINE

INTERNATIONAL COMMITTEE OF PASSENGER LINES

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

NEW YORK COMMITTEE

25 BROADWAY
NEW YORK, N.Y. 10004
TELEPHONE: 212 269-2822
CHAIRMAN: VINCENT A. DEMO

September 24, 1971

Secretary
Federal Maritime Commission
1405 Eye Street, N.W.
Washington, D.C. 20573

DOCKET 71-22

Dear Sir:

As invited in your comments of September 2, enclosed please find original and fifteen (15) copies of this Committee's further comments in respect to the proposed new rules in this Docket.

Sincerely,



V. A. Demo, Chairman
New York Committee
International Committee of
Passenger Lines

VAD:fd
Encs .

BEFORE THE FEDERAL MARITIME COMMISSION

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SCHEDULE OF FEES AND CHARGES :
: :
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Docket No. 71-22

REPLY COMMENTS

of

INTERNATIONAL COMMITTEE OF PASSENGER LINES

The main thrust of objections heretofore put forward by the International Committee of Passenger Lines (ICPL)* is not so much the amount of the individual fees but rather that there should not be any fees at all. These foreign passenger lines in particular receive no benefit from carrying out the objectives of a statute entitled "An Act to Require Evidence of Adequate Financial Responsibility to Pay Judgments for Personal Injury or Death, or to Repay Fares in the Event of Non-Performance of Voyages, to Establish Minimum Standards for Passenger Vessels and to Require Disclosure of Construction Details on Passenger Vessels, and for Other Purposes" (Public Law 89-777).

As was said in Senate Report No. 1483:

"The purposes of this bill are: (1) to promote the adherence to modern fire safety standards by all passenger vessels and (2) to insure

*List attached.

financial responsibility on the part of ship-owners and operators to pay judgments for personal injury or death and to repay fares in the event of nonperformance of voyages."

When Rear Admiral Harllee, former Chairman of the Federal Maritime Commission, testified before the Senate Committee on Commerce on this bill, he said not one word about benefit to the shipowners but appropriately addressed himself to the benefit to the travelling public, the true beneficiary of the statute. (U.S.C. Congressional and Administrative News, 89th Cong., 2nd Sess., Vol.3, p.4184.) The statute imposes very substantial burdens upon the carriers but says nothing about their paying the Federal Maritime Commission for the policing of responsibilities under it.

The Commission, in its statement served September 3, 1971, acknowledges (p.25) that some services are of greater benefit to a recipient than others and can only say that the activities "generally result in some tangible benefit to the filing party over and above that which accrues to the general public". This feeble generalization does not outweigh other, more significant considerations. In a report to Congress by the Comptroller General of the United States on "Need to Improve Administration of Fees and Charges of Regulatory Agencies" (dated October 23, 1970) it is pointed out:

"With the exception of the fee for independent ocean freight forwarders, FMC has not established fees and charges for benefits granted identifiable recipients pursuant to its functions in regulating the domestic offshore and foreign commerce of the

United States primarily because most of the U.S. foreign trade is carried on carriers belonging to foreign nationals or foreign countries. FMC stated that the assessment of fees or charges on foreign-flag carriers or on foreign-based conferences of carriers would result in strong representations and protests by the foreign countries to both the President of the United States and the Department of State and possible retaliatory measures by the foreign countries against U.S. carriers. FMC stated further that it would be unfair and discriminatory to assess fees and charges only on U.S. carriers and U.S. based shipping conferences receiving benefits from its functions."

It is not necessary to remind the Commission that each and every carrier member of ICPL is a foreign-flag carrier, which is true at this time of all but a very few of the passenger Lines serving the United States.

The Committee members respect the abilities and diligence which has been brought to bear by those in charge of the subject of certification, but they wonder whether the efforts in devising a system and scheme of guarantees has not by this time led to the development of a pattern which makes the handling of future applications almost a matter of routine. The Commission's statistics indicate that only 24 applications per year are anticipated, confirming that the bulk of the work of the Commission's staff is behind them and the pattern has been set. The P&I guarantees, which provide the background for almost all certifications, have now become standardized, and little more than a clerical survey should now be required. It is hard to rationalize the maintenance of any sizable staff for servicing 24 applications. Ordinary efficiency would dictate that those in charge would be utilizing

their talents elsewhere. If so, compensation should come from other sources. Certainly, the incidental activities connected with these 24 applications are not such as to warrant the collection of any fees from the passenger lines.

Apart from all other considerations, no service is performed in receiving an application for a passenger ship certification, and it is to be noted that no similar charge is imposed for the receiving of Section 15 agreements. If the fee is to be based upon benefits conferred, it can in no sense relate to the mere "receiving" of an application which may or may not result in a certification.

The ICPL cannot help but feel that the charges allocated by the Commission to certification are overwhelmingly related to regulatory functions which are properly for the account of the Government and not, under any circumstances, for the account of the parties regulated.

It is the Committee's position that the previous practice of treating the activities of the Commission in relation to passenger vessels as regulatory, and not as licensing, is the correct one. The Commission should continue its longstanding practice of refraining from charging fees, which prevailed long after the passage of the Independent Offices Appropriation Act, and no charges should be imposed.

Dated: New York, N.Y.
September 24, 1971

Burton H. White
Elliott B. Nixon
Of Counsel

Respectfully submitted

INTERNATIONAL COMMITTEE OF PASSENGER LINES

BY: Vincent A. Demo
Vincent A. Demo, Chairman
New York Committee

INTERNATIONAL COMMITTEE OF PASSENGER LINES

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

NEW YORK COMMITTEE

25 BROADWAY
NEW YORK, N.Y. 10004
TELEPHONE: 212 269-2622

CHAIRMAN: VINCENT A. DEMO

November 23, 1971

The Honorable Daniel K. Inouye
Chairman, Subcommittee on Foreign
Commerce and Tourism
United States Senate
Washington, D.C. 20510

Re: S. 2577

Dear Senator Inouye:

The International Committee of Passenger Lines, comprised of 18 of the major foreign flag carriers providing ocean steamship passenger services and pleasure cruises from United States ports, submits herewith its comments in connection with S. 2577 which would protect the travelling public by providing for regulation of the travel agency industry. A list of the members of our Committee is attached.

Generally speaking, travel agents are honest and dependable, but unfortunately some occasions have arisen in recent years involving a few (particularly tour organizers) who have failed to meet adequate standards of dependability and trustworthiness with consequent financial loss and inconvenience to the travelling public. This, in turn, has reflected adversely on the travel industry as a whole. For this reason our Committee supports the aims of S. 2577.

However, we should emphasize that in contrast to travellers utilizing/other modes of transportation, all persons booking accommodation on passenger ships are already in a preferred position. Ever since the passage in 1966 of Public Law 89-777 (46 U.S.C. § 817e), these passengers have been fully protected for refunds of steamship fares, whether collected by the ocean carriers themselves or by their appointed travel agents, in the event of non-performance of scheduled ocean transportation. Each passenger ship operator is required to obtain a certificate of financial responsibility, issued by the Federal Maritime Commission, which is based on bonds or insurance guarantees filed with the Commission. The amounts involved are very substantial. Under the Commission's regulations (46 CFR 540.5) the coverage must represent no less than 110% of the unearned passenger revenue of the steamship company on the date within the two fiscal years immediately prior to the filing of its application which reflects the greatest amount of unearned passenger revenue. In many instances, the amount involved is as high as \$5,000,000. In the event of a charter, the coverage provided by the steamship line continues, unless it notifies the Commission to the contrary in which case the charterer himself must provide

The Honorable Daniel K. Inouye- 2 -

coverage in an amount satisfactory to the Commission.

Although we consider that HR 2577 is unnecessary insofar as passenger ship transportation is concerned we nevertheless recognize that such transportation is often sold in combination with other forms of travel arrangements. We, therefore, support the adoption of S. 2577 or any amendment thereof which would protect passengers against the loss of revenue for extraneous services provided in connection with steamship travel.

We would appreciate having the foregoing comments made a part of the record.

Yours sincerely,

Vincent A. Demo
Chairman, New York Committee
International Committee of Passenger Lines

VAD/jmm

INTERNATIONAL COMMITTEE OF PASSENGER LINES

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

NEW YORK COMMITTEE

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

CHAIRMAN: VINCENT A. DEMO

December 22, 1971

The Honorable Warren G. Magnuson, Chairman
Senate Committee on Commerce
United States Senate
Room 127, Old Senate Office Building
Washington, D.C. 20515

Dear Senator Magnuson:

S. 2754

I am Chairman of the New York Committee of the International Committee of Passenger Lines (ICPL) which is made up of 18 foreign passenger Lines (list attached) presently serving the United States ports in international passenger transportation and in connection with cruises from American ports.

I am writing to express the concern of our Member Lines over a doubtless inadvertent reference in Sec. 902 of S. 2754 to the reasonableness of "fares" -- a term which in shipping parlance has always been interpreted as a charge made for the transportation of passengers rather than cargo. This reference would inject into Section 17 a prohibition against "fares" higher than those for similar movements between two foreign countries. This would constitute a substantive amendment of the Shipping Act and cannot be taken lightly.

Your Committee should note that the only substantive control over charges of international ocean carriers is contained in Section 18(b)(5) of the Shipping Act which gives to the Federal Maritime Commission limited authority over freight rates ("which, after hearing,

The Honorable Warren G. Magnuson

December 22, 1971

it (the Commission) finds to be so unreasonably high or low as to be detrimental to the commerce of the United States.") It is significantly important that the word "fare" is not used in Section 18(b)(5). This was deliberate. In 1961, when Section 18(b)(5) was inserted into the Shipping Act, there was testimony on behalf of the various passenger Lines which convinced the Congress that it was inappropriate to insert into the Shipping Act any controls over the level of international passenger fares -- this on the theory that passenger fares were not a matter of grave concern in connection with the foreign commerce of the United States and that it was wholly impracticable to deal with the separate charges for rooms and services, cruises, etc. which are so varied in passenger transportation. The same conditions which led Congress to omit "fares" from Section 18(b)(5) still prevail today and it is significant that, in the proposed amendment of Section 18 by S. 2754, the word "fare" does not appear, leaving the section as originally related solely to cargo rates and charges.

The overall result may be unintended, but - whether unintended or intentional - it finds no justification in the proposed amendment and we respectfully submit that it should be omitted from Section 902 of S. 2754.

Finally, I would wish to add that this letter is not intended as any expression of views on other subjects with which we are unconcerned and as to which others will doubtless have comments to make.

Very truly yours,



Vincent A. Demo

Chairman, New York Committee
International Committee of Passenger Lines

INTERNATIONAL COMMITTEE OF PASSENGER LINES

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

NEW YORK COMMITTEE

25 BROADWAY
NEW YORK, N.Y. 10004
TELEPHONE: 212 269-2822
CHAIRMAN: VINCENT A. DEMO

January 5, 1972

The Honorable John A. Blatnik
Chairman, Public Works Committee
United States House of Representatives
Rayburn House Office Building
Washington, D.C.

My dear Mr. Chairman:

I should like to refer to my July 7 letter (a copy of which is enclosed for your ready reference) in which the International Committee of Passenger Lines emphasized the impossible burdens which would be imposed upon steamship carriers in international trade if they were required to comply, not only with Federal sewage regulations, but also with differing laws of each of the various coastal States at which their ships call.

The present letter is prompted by the enclosed article which appeared in the New York Journal of Commerce for December 29, 1971 concerning a statement submitted to your Committee by Attorney General Lefkowitz of New York. Although I have not seen a copy of that statement, Mr. Lefkowitz appears to have suggested that States should be free to enforce stricter water quality standards for the discharge of sewage from vessels than those proposed by the Federal Government. This, of course, is directly contrary to the position urged in our July 7 letter and wholly misses the mark so far as the fundamental causes of sewage pollution of New York Harbor waters is concerned. This is evidenced by the enclosed newspaper article (New York Journal of Commerce for December 28, 1971)

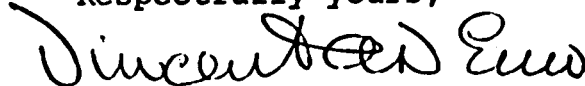
January 5, 1972

reading in part as follows:

"The New York District, Army Corps of Engineers, recently reported that over 1.8 billion gallons of municipal wastes are discharged every day into New York Harbor and its Atlantic Ocean approaches. Almost 300 million gallons of it is untreated sewage."

It is thus obvious that the amount of sewage pollution by vessels engaged in international trade is infinitesimal in relation to that emanating from shore-based sources. Although Members of our Committee support all reasonable pollution-control efforts, they sincerely trust that the basic underlying causes will be kept in their proper perspective during your Committee's deliberations on the proposed legislation. At least so far as vessels engaged in international commerce are concerned, the preemption by the Federal Government of inconsistent State laws should be mandatory. You are doubtless already familiar with the December 10, 1971 decision of the three-judge federal court for the Middle District of Florida in the American Waterways Operators, Inc., et al. v Raubin O'D. Askew, et al., holding the Florida Oil Spill Prevention and Pollution Control Act unconstitutional as an impermissible attempt to legislate within the admiralty jurisdiction.

Respectfully yours,



Vincent A. Demo
Chairman, New York Committee
International Committee of Passenger Lines