



May 29, 2003

Norman Y. Mineta
Secretary of Transportation
Department of Transportation
400 7th St S. W. PL-401
Washington, D.C. 20590

Re: Docket OST-2003-14480

Dear Mr. Mineta,

Expeditors is a global logistics company headquartered in Seattle, Washington. Expeditors employs trained professionals in 168 offices and 13 international service centers located on six continents. Services include air and ocean freight forwarding, vendor consolidation, customs clearance, marine insurance, distribution and other value added international logistics services.

Expeditors herewith expresses our formal concern to the United States Department of Transportation with regard to the above mentioned docket number related to the International Air Transport Association's (IATA) Cargo Tariff Conference Resolution 502 adopted at the IATA Cargo Tariff Conference held at the Hague in May 2002.

Despite our repeated requests to IATA to provide a logical, detailed justification for the adoption of the resolution, supported by actual industry data of global air freight densities, we have not, to date, received a sufficient response to our questions. The clarifications we did receive were based rather on subjective reasoning related to aircraft weight/space limitations, aviation technology improvements, and methods used by other transport modes with regard to charging on volumetric cargo. Hence, we remain unconvinced. Until such time as IATA can provide objective and substantiated justification, we do not believe there is sufficient cause for the adoption of this resolution. As such, Expeditors respectfully submits that we cannot support the implementation of the resolution as it currently stands.

Sincerely,

Corey Mahjoubian
Director – Global Airline and Gateway Development