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November 17, 2005



BY HAND DELIVERY

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Seventh Floor
Washington, D.C. 20423

ENTERED
Office of Proceedings

NOV 17 2005

Part of
Public Record

**Re: STB Docket No. WCC-101
Government Of The Territory Of Guam v. Sea Land Service, Inc.,
American President Lines, Ltd., and Matson Navigation Company,
Inc.**

Dear Secretary Williams:

On November 16, 2005, an oral argument was held before the Commission concerning the appropriate rate reasonableness standard to be applied in the above-referenced proceeding. During the argument, a question was raised by the Commissioners as to whether all of the traffic that was a subject of the proceeding before the Federal Maritime Commission in its Docket No. 89-26, *Government of the Territory of Guam v. Sea-Land Service, Inc. and American President Lines, Ltd.*, was traffic moving pursuant to tariffs or whether some of the traffic moved under contracts.

We have looked into the matter and have determined that all of the traffic that was the subject of the analysis of the FMC in that docket involved traffic moving under tariffs of the defendant carriers.



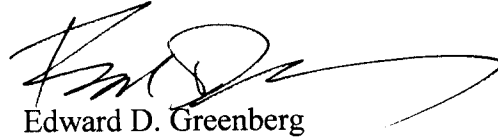
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The Honorable Vernon A. Williams
November 17, 2005
Page 2

If you have any questions concerning this, please do not hesitate to contact me.

Very truly yours,



Edward D. Greenberg

cc: Chairman Roger Nober
Vice Chairman W. Douglas Buttrey
Commissioner Francis P. Mulvey
David Konschnik
All Parties of Record