



April 26th 2006

Mr. Ong Beng Lee
Chief Executive
Competition Commission Singapore
5 Maxwell Road
#13-01, Tower Block
MND Complex
Singapore 069110

Dear Beng Lee

Ref BEO proposal - CCS invitation for Industry comments

APL as a leading Ocean and Inland Transportation Service provider, while also being a member of several Liner Agreements as defined by the draft BEO , would like to place on record our in-principle support of the BEO proposal as it currently stands.

We are of the opinion that, with this document, CCS has illustrated a commendable willingness to support both free market competition and at the same time ensuring legislation does not constrain service providers' abilities to offer Singaporean Industry cost effective, value added, service levels which can only be achievable through open dialogue between not only the providers themselves but also their customers.

We also believe that, for clarity sake, market share is best measured through actual volume lifted, (TEUS/FEUS), by the service provider, rather than through capacity available, because the latter could conceivably be artificially constrained by either vessel ad-hoc omissions and/or deadweight/space constraints imposed from other Port calls.

APL would like to take this opportunity to thank CCS for their proactive approach with this piece of legislation, in seeking Industry opinion, and also for the constructive way in which CCS considered those opinions.

We look forward to working with CCS in implementing the BEO, and indeed the Singapore Competition Act in its entirety.

Kind Regards.

Ronald D. Widdows
Chief Executive Officer, APL

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