From: Sheoprosad, Niran [mailto:Niran.Sheoprosad@2wglobal.com]

Sent: 11 December 2012 02:58 PM **To:** tariffcomments@portsregulator.org

Subject: TNPA TUG CHARGES for 2013 Tariff Review

To : Ports Regulator Att : The Chairman

Dear Sir,

Firstly, I must be honest that we have never really attended the Ports Regulator tariff meetings in 2010 and 2011 may have channelled our issues to the wrong persons in the past.

This year, after attending the tariff hearings we thought that we should share some information on previous tariff issues (not sure if you were aware of this or brought up in 2012 tariff hearings) that somewhat persists and tug tariffs just gradually increased in 2012 on top of dramatic increase in 2011.

As, stated on the 3rd email attached, as ship owners and building new vessels with latest technology to manoeuvre vessels, doesn't help at RSA ports as a vessel is charged per the GRT and not by number of tugs used.

Our first argument is the dramatic increase on tugs charges for vessels with GRT between 40,000 and 60,000 in 2011. Our second, is that there should be a charge per tug used rather than vessels size.

Hope the attached is still valid and can be used for the 2013 tariff hearings if possible.

Best Regards

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