

Forwarded Message:

Subj: EBB transition concerns

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Rae and Crew,

I realize the comment period has passed regarding the EBB transition models, but thoughts in my head just now gelled, and I wanted to communicate them anyway. I'm not as interested in getting these posted as I am in getting the authors to consider these points going forward.

I finally discovered why I've been experiencing such a great feeling of discomfort over the approaches which seek to eliminate EBB's altogether (also precluding efforts to create standardized transactional websites) and move to EDI as the only way to transact business.

Many pipes link up nominations in a confirmation-like way, where the shipper can see if all the key field information supplied by both himself and his counterparty matches (otherwise the nom will fail). Since there are so many key fields to this matchup process (Service Contract, Service Contract Package ID, Up/Downstream Contract, Up/Downstream Package ID, Up/Downstream DUNS, etc.), the need to ensure that everything is in order prior to the nom being processed is fairly key. Otherwise, ugly and unnecessary intraday activity will be invariably be generated, most notably where it was not before.

This function rests exclusively with "online" transactional interfaces. Therefore, the elimination of these interfaces seems to create an immediate decrease in the usability of the grid (not very seamless or user-friendly).

As a former scheduler, I can't imagine a worse fate than being told I won't know the results of my preliminary nomination match-up attempts until I get the completed scheduled quantity document. Match-up errors are inevitable (something always will be miscommunicated), and are largely eliminated prior to processing through the online transactional interfaces.

I have other concerns regarding this approach:

- * It also forces all entities large and small to purchase an EDI system of some sort, hardly the cost of a simple browser and the fee to access whoever provides online service to the pipes.
- * For last minute trading, inserting the entire EDI process (regardless how lightning fast the transmission) is no substitute for a few keystrokes directly connected to a pipe's database (through whomever). This point may be one of simply learning new ways, but it still will be one to overcome in the mind of the industry.

I'd appreciate any feedback anyone has, if any.

Thanks.

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