

House of Representatives

**An Inquiry  
In Aid of Legislation  
On the Philippine Ports Authority**

September 8, 2006

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# HOUSE COMMITTEE ON OVERSIGHT

## Committee Report

The Philippines is an archipelagic economy consisting of numerous islands that need to be linked by an efficient transport system. Investments in infrastructures like seaports serve as an effective catalyst for the development of the country's regions. Efficiency in the operations of these support infrastructures contribute positively to the country's global competitiveness. Moreover, promoting competition in this sector enhances further overall efficiency.

Unfortunately, the dismal state of the port sector was what prompted the House Committee on Oversight to conduct a series of public hearings for the period March to May 2005. It also aims to investigate and discuss the issues raised during the privilege speech (entitled 'Where there is smoke, there is fire') delivered by Rep. Eduardo C. Zialcita (First District of Paranaque City and Chairman of the House Committee on Housing Development) on November 8, 2004 with the end in view of arriving at definitive findings and specific recommendations with public interest as the primordial consideration.

After careful study and thorough deliberation, the House Committee on Oversight is pleased to submit its Report.

### A. The Subject Matter of the Inquiry

The central issue revolves around two regulatory **issues**:

- (a) The major flaw in the charter of the Philippine Ports Authority (PPA) which results to a conflict of interest between its regulatory and development functions; and
- (b) Regulatory capture

#### CONFLICT OF INTEREST ISSUE

The charter of PPA (PD 857, as amended) vests the port authority with the

- mandate to develop, maintain and operate public ports
- regulate both public and private ports (commercial and non-commercial)

Port regulation occurs at several levels:

- Development/construction of a private port, whether for commercial or non-commercial purposes. A private port developer is required to secure from PPA a permit to develop/construct a private port.
- Operation of a private port, either as a private commercial port or private non-commercial port. The private port owner is required to secure from PPA a permit to operate a private commercial or non-commercial port.
- Approval of petitions for an increase in cargo handling rates. Under the PPA charter, the port authority is allowed to share at least 10% from cargo handling revenues.
- Award of management contracts to private operators for
  - managing PPA ports (e.g., ICTSI and ATI operate PPA's MICT and South Harbor, respectively)
  - providing cargo handling services and other services to PPA ports

The “conflict of interest” arises, because PPA is both in the business of port development and operation as well as regulation.

- In the case of rate regulation, the provision in the PPA charter that allows it to share from cargo handling revenues makes PPA a beneficiary of its own regulation. It is, therefore, no surprise (as will be presented in greater detail later on) why cargo handling rates increase almost yearly.
- In the case of port development/operation, PPA is being accused of using its regulatory powers to disfavor competition to protect its own interest, even at the expense of public interest and despite the fact that such actuation is contrary to government's policy of promoting competition and greater private sector participation.

## REGULATORY CAPTURE

Economic theory suggests the regulation of an industry suffering from *market failure* as a means to protect public interest. A regulatory body like the PPA is established to regulate such an industry. Unfortunately, as in many cases, the industry ends up regulating the regulator. The PPA is not exempt from this sorry state.

It is in this light that Rep. Zialcita accused the PPA of fostering “cartel and monopoly in the port industry, of being insensitive to the nation's welfare” and, therefore, of “economic sabotage.” During his privilege speech, Rep. Zialcita raised the following questions:

### Conflict of Interest

1. Is PPA a biased referee because it owns the ports and, at the same time, is vested with regulatory powers- Judge, Jury and Executioner?
2. Is PPA regulating against competition to protect its own interest even at the expense of public interest?
3. Is it true that PPA, ICTSI and ATI stand to lose from the competition that Harbour Centre provides?

### Regulatory Capture

4. Whatever happened to the modernization and privatization program of the North Harbour? Do they have any? Yes? No? If yes, have you seen it?
5. Has E.O. 305 (Rescinding E.O. 59, promoting competition and transparency in the privatization of the North Harbour) been implemented?
6. Is it true that the same members of the so-called "Consortium" who wanted to monopolize the entire port system in the country under the controversial! E.O. 59 (one operator nationwide, no bidding formula) are the same parties the PPA is protecting?

The Committee on Oversight focused its public hearings on these questions to search for answers, find out the truth, and address the issues with specific recommendations. In this regard, the Committee invited to its public hearings the various stakeholders in the ports sector, especially the PPA to answer point blank the accusations hurled against it.

Unfortunately, the repeated invitations of the Committee were ignored by PPA's General Manager, Atty. Oscar Sevilla. The Committee even extended to GM Sevilla the privilege of selecting the date and time of his appearance in the Committee. However, the PPA GM blatantly refused to honor the Committee's invitations. The failure on the part of the PPA GM to attend the Public Hearings despite efforts of the Committee to adjust to his schedule was most impolite. In the end, the absence of the PPA GM and his failure to properly explain his side cast more doubts than clear the air for PPA.

## B. The Facts

### CONFLICT OF INTEREST

There are two (2) major items discussed in relation to the issue of “conflict of interest” -- the recent rate increases in cargo handling charges, PPA’s regulation against competition (i.e., non-issuance by PPA of a permit for Harbour Centre to handle foreign cargoes).

#### On Cargo Handling Rate Increases

During the public hearings, consumer organizations and industry associations pointed out that the conflict between the regulatory and profit seeking functions have led PPA to be more inclined to grant rate increases to its cargo handling operators and has resulted to unduly higher cargo handling rates in the Philippines. They observed that PPA does not adhere to principles of due process and fair play in the evaluation of petitions for rate increases. An increase in the rate also increases the income of PPA immediately because its share is 10% of whatever revenues the cargo handling operator receives. This explains why cargo handling rates increase almost yearly.

- *Lack of Transparency.* On two occasions, the Committee was represented during public hearings conducted by the PPA concerning a petition to increase cargo handling rates at Port of Manila. Notwithstanding a letter from a Committee member requesting PPA to postpone action on the said petition, PPA went ahead and granted the increases. Rate increases were approved not only for the year 2005 but also for the year 2006.
- *Non-adherence to its own regulations.* Clearly observed was the fact that PPA did not require the contractors to submit financial reports in the manner prescribed under PPA AO 13-96.

It was very clear from the discussions during the public hearings that the Committee was interested to look into the financial operations of the cargo handling companies in Manila in order to appreciate the magnitudes of profits they were earning and the revenues paid to the government as well. The documents offered by PPA however, were entirely useless for this purpose since the consolidated statements even included operations in other countries, as in the case of ICTSI.

The Committee, therefore, finds it very suspicious, if not anomalous, for the PPA to submit to the Committee consolidated financial statements of the private operators especially when evaluation is supposed to be done for one specific area of operations only.

On PPA Regulating Against Competition

There are two (2) cases cited and discussed regarding the issue of PPA being biased against competition to protect itself - Harbour Centre and Mindanao Container Port Terminal,

- *Harbour Centre Case.* There are three (3) ports in Manila servicing foreign cargoes. These Include:

Manila Ports	Terminal Operator	Foreign Containerized Cargo	Foreign Non-Containerized Cargo
<b>Manila International Container Terminal</b> A PPA-owned port but terminal operation was awarded to private company, ICTSI. The 25-year contract of ICTSI which will expire in 2013. The proposed extension for another 25 years was approved by the PPA Board Committee (Board Com Resolution No. 2005-946 dated March 1, 2005)	International Container Terminal Services, Inc. (ICTSI)	With permit and currently operating since 1988	Issued a permit in 1995 by the PPA but is not handling non-containerized cargoes.
<b>South Harbor</b> A PPA-owned port but terminal operation was awarded to private company, ATI. The 10-year contract of ATI was extended by PPA in 1998 for another 15 years up to 2013 per PPA Board Resolution No. 1706	Asian Terminals, Inc. (ATI)	With permit and currently operating	
<b>Harbour Centre</b> A private-commercial port developed in 1996(Private investments on land and infrastructure)	Harbour Centre Port Terminal, Inc. (HCPTI)	No permit	

Source: Existing PPA contracts with its terminal operators – ICTSI and ATI

Based on the table above, the following conclusions can be drawn on the state of competition among the ports of Manila

- There is effective competition in foreign non-containerized cargo between South Harbor and HCPTI. Competition resulted in better services (i.e., reduced cargo loading/unloading time, faster turnaround time for ships, and around 40% reduction in cargo handling cost for shippers.
- There is, however, lack of effective competition in the foreign containerized market. The high cargo handling cost arising from lack of competition serves as an effective trade barrier and undermines the global competitiveness of our exports, particularly electronic products which account for almost half of the country's total exports.

Harbour Centre Port Terminal, Inc. (HCPTI) filed an application to PPA for a permit to handle foreign containerized cargoes since 1998. However, EPA simply decided to just sit on the application despite several Presidential Orders directing PPA to promote competition and grant HCPTI the permit to fully operate as a private commercial port.

Presidential Memorandum Circular No. 45 (04.1993) directs all concerned government agencies to liberalize, and provide an environment conducive to the INCREASED COMPETITION IN THE SUPPORT SERVICES INCLUDING PORT SERVICES. Likewise, EO 410 dated May 1, 1997 confirmed the right of the PPA to implement the policy of accelerating the DE-MONOPOLIZATION and privatization of the government ports in the country.

- *Presidential Memorandum to PPA (03.2000) directs the PPA to support and assist the Smokey Mountain Development and Reclamation Project in the operation of a world-class private commercial port OPEN TO ALL TYPES OF INTERNATIONAL AND DOMESTIC VESSELS.*
- *Presidential Order to PPA (12.2001) which directs the PPA to expeditiously, process applications for the required permits of HCPTI for a private commercial port.*

It must be pointed out that there is no legal impediment to the granting of the permit.

*OGCC Opinion 207 (s. 2003) maintains that "The area of management, operation and development of HCPTI is limited only to MICT (located between South and North Harbors) and its anchorage areas and NOT the entire Port of Manila. (italics added for emphasis) Nowhere in both contracts can be found that HCPTI has the sole and exclusive management and handling operations for container and non-containerized cargoes." Consistent with government's policy of open competition, OGCC recommends for PPA to "to authorize Harbour Centre to operate and handle as a private commercial port, open to all types of foreign and domestic vessels and/or cargoes."*

Instead of implementing the Presidential directives, PPA argues that allowing HCPTI to operate on the handling of foreign containerized cargoes would be disadvantageous to PPA and the government since 50% of PPA's net income is remitted to the National Treasury (as PPA is a GOCC). Instead of collecting a fixed fee or 20% of the cargo handling revenues, PPA claims that it will only receive P20,000 yearly plus a 50% share on docking and wharfage charges.

PPA pointed out that the port operations of Asian Terminals, Inc. (ATI) and the International Container Terminal Services, Inc. (ICTSI) in Manila contributes something like 40% (P2.7 billion) of PPA revenues. In the event that HCPTI is allowed full operations, PPA's own revenues would be greatly affected.

The fact, however, is that HCPTI contributes P80 million annually to PPA for handling foreign non-containerized cargoes. Moreover, using PPA's existing rules, financial estimates reveal that PPA revenues will remain the same if greater competition is, allowed by granting HCPTI the permit to handle the lucrative foreign containerized cargoes (currently being handled by ICTSI and

ATI in PPA ports). For instance, if HCPTI handles 400,000 containers per year, it can contribute as much as P480 million to PPA. And more importantly, the shippers will also benefit because rebates will be offered in order to attract/gain market share. This will redound to a reduction in overall transport cost to the benefit of the economy.

In sum, without increasing the current level of competition, PPA gets a share of P2.7 billion from its terminal operators at MICT and South Harbor. However, with increased competition (entry of HCPTI), the economy as whole will benefit positively.

### Foreign containerized Traffic and PPA Share

PORT	CARGO VOLUME	CONTRIBUTION TO PPA
Without competition		
MICT	1.2 million containers	P 2.7 billion
South Harbor	0.6 million containers	2.1 billion a/
Harbour Centre	0	0.6 billion b/
With Competition		
MICT	1.0 million containers	1.9 billion
South Harbor	0.4 million containers	0.4 billion
Harbour Centre	0.4 million containers c/	0.4 billion d/

Source: PPA Annual Report (2005)

a/ Based on the contract, ICTSI pays PPA fixed and variable fees.

b/ ATI pays PPA 20% share from cargo handling revenues (foreign port)

c/ Based on port capacity, HCPTI can handle 400,000 containers (TEUs). Assumes that HCPTI will get its share equally from MICT and South Harbor.

d/ Like ATI, the contribution of HCPTI to PPA is based on PPA Memorandum Circular No. 41-2002 (Guidelines for Adopting a Universal Share of 10% for domestic cargoes and 20% for foreign cargoes from the revenue of cargo handling operators nationwide (November 5, 2002).

It is interesting to note that open competition will have:

- a. no fiscal implication on the revenue share of PPA from cargo handling but will have
- b. positive economic benefit on the shippers and on the economy in terms of:
  - b.1 Rebates offered by the new entrants to attract/gain market share
  - b.2 A cap on rate increases as competition serves as a market regulator

Finally, the Case of Laem Chabang International Port in Thailand proves and support competition. Established in 1991. Laem Chabang already ranks among the top 20 major ports in the world. In terms of container capacity, the port can accommodate a container throughput of 5 million TEUs. By the end of 2006, container traffic is expected to reach 4.1 million TEUs. Full capacity utilization is expected to be attained by 2010.

Looking at the capacities of each Terminal, the volume ranges from 300,000 TEUs to 600,000 TEUs. These are profitable terminals. In the Philippines, South Harbor handles 600,000 TEUs while MICT handles 1.2 million TEUs. The capacities of the various terminals in Laem Chabang support the argument that the Port of Manila can still accommodate a third player in the container segment of the market. According to World Bank, a profitable port must handle at least 200,000 TEUs per year. Theoretically, the volume of container traffic in the Philippines can support 4-6 operators.

### PHASE I DEVELOPMENT OF LAEM CHABANG PORT

Terminal	Operation	Capacity	Operator	Contract
A0	Coastal service	300.000 TEUS 750,000 MT	LCMT Co.	2004, 30 years
A1	Passenger/RORO		Laem Chabang Cruise	2000, 30 years
A2	Multipurpose Term.	400.000 TEUs	Thai Laem Chabang	20132, 30 years
A3	Multipurpose Term.	400,000 TEUS	Hutchison Laem Chab	2004, 30 years
A4	General/Bulk	70040Q MT	Aawthai Warehouse	19931 25 years
A5	RORO*/Multipurpose	4 million MT	Namyong Terminal	1996,25 years
B1	Container Terminal	600,000 TEUs	LCB Container 1cr.	1991,27 years
B2	Container Terminal	600,000 TEUs	Evergreen	1093, 27 years
B3	Container Terminal	600,000 TEUS	Eastern Sea LCB	1906, 27 years
B4	Container Terminal	600,000 TEUs	TIPS Co.	1994,27 years
B5	Container Terminal	600,000TEIJs	LCB International	1996. 30 years
CO.	RORO Terminal*	1.1 million cars	LB Intl RORO Ter.	
C3	Container Terminal	1 million TEUs	LCB International	2004, 30 years
Shipyard			Unithai Shipyard Eng	1990, 30 years
	TOTAL	6millionTEUs 5.45 million MT >1million cars		

RORO is used for transporting (exporting) cars manufactured in Thailand

- *Mindanao Container Port Terminal Case.* MCPT is a government port that lies within the PHIVIDEC Industrial Estate in Jasaan, Misamis Oriental. It was developed using borrowed-funds from JBIC. After its inauguration by President Arroyo in April 2004, MCPT failed to operate commercially due to the issuance of a Temporary Restraining Order (TRO) by a regional trial court.

The PPA pleaded with the Office of Government Corporate Counsel (OGCC) to argue in favor of the issuance of a TRO in their behalf as an interested party. PPA probably forgot, that like them, the PHIVIDEC, which owns the MCPT is also a government owned corporation:

The concern of PPA is the negative impact (revenue loss) of the competition MCPT will bring against PPA's Cagayan de Oro Port. Such is the narrow-minded view of PPA and its officials as exhibited in their letter

to the OGCC dated May 4, 2004, seeking for a permanent injunction against the operation of the MCT.

## REGULATORY CAPTURE

The close relationship between PPA and its “developmental partners” serves to reinforce the perception that PPA suffers from “regulatory capture”. In the course of the public hearings, two (2) cases were cited as proof of this capture – PPA’s approval of the extensions of the contracts of ICTSI and ATI.

### 25-year Extension of ICTSI Contract

During the public hearings, the extension of the ICTSI contract was taken up and PPA admitted that although the current contract still had eight years to go, PPA approved the extension of the contract for another 25 years. PPA justified the extension because the good performance of ICTSI plus an offer from ICTSI to invest \$125 million during the period.

Going over the contract between the PPA and ICTSI for the operation of MICT, the Committee came across an important provision in said contract, a major basis for granting the contract to ICTSI – i.e., the development of new business in the form of transshipments coursed through MICT.

*Section 3.12. Promotion of New Maritime Business - Primarily Foreign Transshipments. The CONTRACTOR shall encourage and promote at MICT new maritime business, primarily foreign transshipments. It is understood and agreed that the CONTRACTOR’S ability to attract and - encourage foreign transshipment cargo at the MICT and maximize its utilization is a major factor in the AUTHORITY’S entering into this CONTRACT with the CONTRACTOR. As such, the CONTRACTOR hereby commits to generate the annual throughputs of foreign transshipment cargo at the MICT as enumerated in ANNEX F hereof which is a major commitment of the CONTRACTOR in its OFFER TO BID submitted to the AUTHORITY and which is hereby made an integral part of this CONTRACT. If the total volume of transshipment cargo actually handled at MICT during the first five-year period and each succeeding three-year period is lower by more than twenty (20%) percent of the volumes committed by the CONTRACTOR for that same period, the AUTHORITY shall have the right to cancel this CONTRACT upon one (1) month prior written notice to the CONTRACTOR by the AUTHORITY*

No such business has been developed but PPA has deemed it proper to extend the contract for another 25 years with a promised investment of \$125 million, instead of canceling the contract due to the failure to generate the required new business.

### ATI Request for Contract extension

The extension of the ATI contract was also taken up during the public hearings and PPA admitted that ATI submitted its application for an extension of another 25 years (like FCTSI). Their justification for the extension is to concentrate on the operation and development of their containerized business and passenger terminal business because of the reduced market share in the non-containerized business.

### **C. Committee Findings**

#### CONFLICT OF INTEREST

#### On Cargo Handling Rate Increases

The PPA did not even take into consideration that aside from the contractors, which petitioned for the increases due to losses incurred in their operations, there were some contractors who were making good margins, from their operations. It is therefore very apparent that increasing cargo-handling rates, where it shares 10%-20% on cargo handling revenues, becomes a very tempting proposition to PPA. This proposition, however, is anti-business, anti-transparency and, ultimately, anti-consumer. The only parties who benefit from this flawed regulation/policy are PPA, its terminal and the cargo handling operators at the expense of the entire economy.

#### On PPA Regulating against Competition

PPA acknowledges the fact that it has been inviting private investors to become their partners in developing private ports, having adopted a liberalized policy on port operations. But then, PPA cannot allow just any operator to come in, especially those who will compete directly against it. Thus, in direct defiance to Presidential directives, PPA refused to promote competition that would have greatly benefited the economy,

Increased competition will result in measurable economic benefits that will directly contribute to growth and employment.

- Better service, faster turnaround, lower transportation costs for business: 30%-40% rate discount, plus efficiency gains: Harbour Centre will continue to offer rates that are lower than PPA approved rates.
- Lower prices for consumers: Most of our imports are finished products that are directly consumed by the consumers. Lower cost of handling can be a countervailing force to inflation,
- Impact on economic growth: Electronic products, which account for about half of the country's exports, are shipped by sea. Lower cost of handling will increase the global competitiveness of our exports, especially electronic products. This will lead to an increased demand for our products.

Finally, competition will increase government revenues. Regardless of the rate of discount offered by the port operators as a result of competition, PPA stands to gain more from increased revenues.

## REGULATORY CAPTURE

The Committee cannot understand the urgency with which PPA approved the 25-year contract extension of ICTSI which is still due to expire eight (8) years from now. It can only surmise that there must be a compelling reason for PPA to act in such way. The reason behind this is not explained to the Committee.

## DIRECT IMPACT ON PORT USERS AND THE ECONOMY

Members of the private sector particularly the Distribution Management Association of the Philippines (DMAP)<sup>1</sup> represented by Mr. Ed Sanchez, and Federation of Philippine Industries (FP!) represented by Mr. Meneleo Carlos, testified at the committee hearing calling for the rollback of increases in cargo handling rates. Their petition is based on PPA's implementation of a 12% increase in March 2005 and a 10% in March 2006 for foreign containerized cargoes.

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<sup>1</sup>DMAP is an association of more than Ninety (90) companies involved in product distribution. Its objective is to lower the cost of distribution of goods while improving service. Most DMAP members are cargo owners, both manufacturers and distributors and some are service providers. Virtually all are users of shipping services and are the ones paying for the arrastre and stevedoring charges. Some members of DMAP are Splash corporation, Johnson and Johnson, Unilab, Smart Communications, CDO, Colgate, PLDT Cheng Ban Yek, Baguio Oil, San Miguel Corporation, Zuellig Pharma Accord. Logistics, TNT Express, Loscam Philippines, Sr. Marketing, Nestle Philippines, Proctor and Gamble, Unilever, Purefoods, Universal Robina, California Manufacturing, Swift Foods, Selecta, Kraft Foods, Del Monte, Heinz UFC, Coca Cola, IDS, Wyeth, SC Johnson, Caltex Phils. and Shell Philippines.

Based on a recent World Bank study, the Philippines has the highest port and terminal handling costs among various Asian countries:

Port and Terminal Handling Cost	
• Malaysia	US\$107
• Singapore	146
• Indonesia	186
• Thailand	67
• China	75
• Philippines	546

Benchmarking the Philippines with Thailand, the deadweight cost of inefficiency to the economy is roughly P40 billion. This is the amount Philippine importers and exporters pay more than their Thai counterparts.

DMAP argued that despite the objections raised by the shippers as well as the call for an evaluation of the financial statements of the petitioners, PPA granted not only the rate increase for 2005 but also the rate increase for 2006. Moreover, DMAP informed the Committee that as a practice, PPA gives the notice for hearings a day or two prior to the actual conduct of the public hearings. PPA does not provide the necessary documents and justifications for rate increases. At the public hearing, the petitioners for the increase and the hearing panel (PPA) sit together in front while oppositors like DMAP are seated in the audience facing them.

The Coalition for Ports and Shipping Modernization also argued that the PEA is a biased referee because it owns the ports and, at the same time, uses its regulatory power to thwart competition. Since PPA owns South Harbor and MICT, it uses its regulatory power by disallowing competition to preserve its own interest even at the expense of public interest. A good example is the case of NAIA 3, a private sector investment in airport terminal development. The facility is depreciating because it is not being utilized. And because of this, the government decided to step-in so that the public will benefit from its operation while resolving the legal issue in court. In the case of Harbour Centre, the facility is also available for use but the government is not allowing it to fully operate thus minimizing the potential gains the public could derive from the competition it stands to bring. Why does the government have conflicting positions on two similar cases?

## **D. Recommendations**

The Constitution itself recognizes the detrimental effects of monopolies and the indispensable role of the private sector in the development of the national economy. Fiscal constraints and the existing monopoly in the provision of port services have contributed to the dismal state of the country's port infrastructure facilities.

Cognizant of such limitations, the Government has adopted a policy of de-monopolization and greater private sector investments in port facilities and equipment - to minimize unnecessary capital expenditure by Government as well as to encourage competition and increased efficiency in port operations and the provision of port services.

The actuations of PPA, therefore are in violation of the existing policies on open competition and have undermined the country's global competitiveness. To correct this malady, the Committee therefore recommends the following actions:

1. Amend the charter of the PPA by
  - Separating its development and regulatory functions
  - Deleting the provision that allows PPA to share from cargo handling revenues
2. Pass a House Resolution requesting the President to
  - Order the PPA to institutionalize and allow competition in port operations -- foreign and international cargo which will redound to greater efficiency in the shipping industry and economic gains for the country.
  - \* Disapprove/revoke the PPA recommendation to extend for another 25 years the contract of ICTSI which is due to expire on 2013
  - Order the OGCC to look into the violations on the existing contract between PPA and ICTSI

## ANNEXES

- Privilege speech of Rep, Eduardo C. Zialcita on November 8, 2004 entitled <sup>1</sup>Where there is smoke, there is fire.
- Supplemental Contract to the PPA-ATI Contract for Cargo Handling Services dated 13 March 1992
- PPA-ICTSI Contract for Cargo Handling Services dated January 1998  
CGCC (Office of the Government Corporate Counsel) Opinion No: 207 s. 2003
- PPA Memorandum Circular No. 41-2002 Guidelines for Adopting a Universal Government Share of 10% for domestic cargoes and 20% for foreign cargoes from the revenue of cargo handling operators nationwide (November 5, 2002)

