



President and CEO  
**Joanne F. Casey**

**INTERMODAL ASSOCIATION OF NORTH AMERICA**

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April 22, 2016

Docket Management Facility  
U.S. Department of Transportation  
West Building Ground Floor, Room W12-140  
1200 New Jersey Ave S.E.  
Washington, DC 20590-0001

Subject: Comments Regarding DOT-OST-2015-0248

Dear Mr. Secretary,

On behalf of the Intermodal Association of North America (IANA), thank you for providing the opportunity to comment on the United States Department of Transportation's (USDOT) draft National Freight Strategic Plan (Plan). IANA is North America's leading industry trade association representing the combined interests of the intermodal freight industry. Our membership roster is expansive and varied, representing the diverse companies critical to moving freight efficiently and safely. With over 1,000 corporate members, those belonging to IANA include intermodal truckers and over-the-road highway carriers, railroads, ocean carriers, port authorities, intermodal marketing and logistics companies, and suppliers to the industry. As it is our mission to promote the growth of efficient intermodal freight transportation, the development and publication of this Plan is of great importance to our industry.

We applaud Congress and the Administration for prioritizing freight infrastructure under the FAST Act and view the included freight infrastructure funding commitments as a first step in addressing years of deferred maintenance and neglect. The FAST Act also makes advancements in freight policy, expanding upon the highway-centric nature of MAP-21's freight program to adopt a holistic approach to the movement of goods. To that end, we commend USDOT for anticipating this shift and developing a multimodal Plan. The Plan references several documents, including the Primary Highway Freight Network, the National Freight Network and the Multimodal Freight Network and therefore, IANA has included comments on those items as well.

A highly-functioning freight system requires modes working together seamlessly, and in particular, connections between modes require investment. Intermodal connectors are essential to the mobility of freight movements and allow for the actual ingress and egress between intermodal facilities and the National Highway System. They are an integral part of the network and enable seamless flow between origination and destination points. As stated in the Federal Highway Administration (FHWA) report, [The Role of the National Highway System Connectors: Industry Context and Issues](#), "intermodal connectors tie the transportation system together... when they are inadequate or congested, the connectors can be an obstacle to the seamless movement of cargo needed to support US businesses and national security."

Despite the important role of “first and last mile connections,” intermodal connectors are generally in poor condition when compared to the rest of the freight transportation network. According to FHWA’s 2002 study, intermodal connectors were at least 50 percent less maintained than the rest of the highway system. The backlog of improvements needed to bring intermodal connectors back to a state of good repair totaled \$2.597 billion, while the cost for improving service due to expected increases in freight volumes was \$4.291 billion. These figures are now nearly 15 years old. In the years intervening, it is likely that both of these numbers have risen, although unfortunately, there has been no further research conducted at the federal level to illuminate these needs. Freight intermodal connectors link the freight network and it is imperative that they are included in FHWA’s planning and investment tools, including the Primary Highway Freight Network, the National Highway Freight Network, and the Multimodal Freight Network.

To that end, IANA appreciates that FHWA included all intermodal connectors in the 48,518 mile comprehensive Primary Freight Network, finalized on October 23, 2015. We further applaud Congress for selecting this map for use in the FAST Act’s Primary Highway Freight Network. Going forward, we encourage USDOT to give priority consideration to all intermodal connectors when determining an interim and final National Multimodal Freight Network and future iterations of the National Highway Freight Network. We discourage limiting inclusion to “key” freight intermodal connectors, as the draft Multimodal Freight Network in the draft National Freight Strategic Plan does.

Finally, IANA requests a transparent process in which stakeholders can weigh in and easily understand how USDOT identified an interim and final National Multimodal Freight Network, as required by the FAST Act. This network is a significant piece of the Plan and our future infrastructure investment strategy. A National Multimodal Freight Network, by its very nature, will be complex and require input of the freight system’s many and varied stakeholders.

Should you have any questions on these comments, please do not hesitate to contact me. I can be reached at (301) 982-3400 ext. 349 and via email at [jeni.casey@intermodal.org](mailto:jeni.casey@intermodal.org). I hope you find our comments useful as you work to improve and update the Plan to reflect the changes required by the Fixing America’s Surface Transportation (FAST) Act.

Sincerely,



President and CEO  
Intermodal Assn. of North America