

August 13, 2025

Paul Baumer
Office of the Assistant Secretary for Multimodal Freight
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Docket No. DOT-OST-2025-0369

Dear Mr. Baumer:

On behalf of the Intermodal Association of North America (IANA), the leading transportation trade association representing the combined interests of the intermodal freight industry, I am writing to share our perspective on the 2025 update of the National Freight Strategic Plan (Docket No. DOT-OST-2025-0369).

IANA's membership roster of over 1,000 corporate members includes intermodal and over-the-road motor carriers, railroads (Class I, short-line, and regional), water carriers, port authorities, intermodal marketing and logistics companies, and suppliers to the industry such as equipment manufacturers, leasing companies, and technology firms. IANA's associate (non-voting) members include shippers (defined as the beneficial owners of the freight being shipped), academic institutions, government entities, and non-profit trade associations.

We appreciate your leadership on this important effort and your support for intermodal goods movement. IANA looks forward to working with you and would welcome the opportunity to further engage with your office. If you or your staff have any questions, please do not hesitate to contact me at areinke@intermodal.org or 301-982-3400.

Sincerely,



Anne Reinke
President and CEO
Intermodal Association of North America

National Freight Strategic Plan 2025 Update

1. The 2020 NFSP outlined three overarching goals and accompanying strategies to guide national freight policy:

- **Improve the Safety, Security, and Resilience of the national freight system;**
- **Modernize Infrastructure and operations to grow the economy, to increase competitiveness, and to improve quality of life; and**
- **Support the Development of Data, Technology, and Workforce Capabilities that improve freight system performance.**

Do the three overarching goals of the 2020 NFSP still reflect the most urgent national priorities for freight policy in 2025? If not, what changes or additions would better reflect today's needs? How should any existing goals or strategies be reframed given changes in the freight system since 2020?

The three broad, overarching goals of the 2020 NFSP continue to serve as a strong foundation for national freight policy to support safety, infrastructure, and innovation. IANA recommends that DOT reexamine the “strategic objectives” outlined in the 2020 NFSP to meaningfully guide the updated plan. The realities of freight movement in 2025 are vastly different than they were in 2020. In just five years, the industry has weathered a global pandemic, a remarkable spike in theft and fraud, a freight surge followed by a freight recession, and trade policy changes never experienced in the lifetime of industry practitioners. While predicting the future is always a challenge, there are sufficient indicators that the plan should consider: an increased number of weather-related supply chain disruptions; shifting trade patterns; and emerging technologies that can either enhance or challenge the safety and security of supply chains. While the plan is national in scope, it is also worth noting that state-level regulations impacting supply chain operations ripple across the nation. We encourage the plan to promote policy that protects the federal government's role as the leading facilitator and regulator of interstate commerce.

2. How has the 2020 NFSP influenced freight planning, policies, or investments at the Federal, State, local, or private sector levels? What changes would make the 2025 NFSP more impactful or useful in guiding future freight-related actions?

The 2020 NFSP elevated freight policy as a national priority and helped raise awareness of the freight system's strengths and weaknesses. It also contained an early framework for the Freight Logistics Optimization Works (FLOW) program, which continues to grow and provide much needed visibility for system users. While the 2020 plan provided an excellent assessment of the state of the national freight system, this articulation would have been greatly aided by a finalized National Multimodal Freight Network (NMFN). As DOT develops the 2025 NFSP, we encourage inclusion of a finalized NMFN – incorporating all the nation's freight intermodal connectors, facilities, gateways, and major routes and corridors – as well as clear, forward-looking guidance on the alignment of federal resources with freight priorities and strategic policies to improve system-wide efficiency and operations.

3. What metrics—across safety, efficiency, resilience, or infrastructure condition—should DOT use to evaluate multimodal freight system performance? How can performance measurement inform decision-making and project prioritization across all levels of government?

Due to the national, multimodal, and interconnected nature of goods movement, IANA encourages DOT to take a holistic, system-wide approach when assessing freight performance. Performance measures should focus on metrics that evaluate end-to-end freight movement through critical gateways and corridors. It is worth noting that intermodal freight transportation, as measured against safety, efficiency, resilience, and infrastructure condition, scores favorably:

- **Safety:** Replacing long-haul truck movements with a combination of truck and rail reduces friction between freight and the motoring public, improving safety for all road users.
- **Efficiency:** Rail offers superior fuel efficiency to long-haul truck movement. Rail is capable of moving one ton of freight nearly 500 miles on a single gallon of diesel fuel. Combining this long-haul movement with the nimbleness offered by trucking for the first and last mile, intermodal transportation maximizes fuel efficiency, and ultimately, cost effectiveness.
- **Resilience:** The intermodal container was designed to introduce a seamless interoperability to conveyance. The intermodal container can be conveyed by rail, ship, truck, and barge, which makes nearly every mode of transportation an option when rerouting is necessary due to unforeseen disruptions.
- **Infrastructure Condition:** Intermodal freight movement results in savings on highway maintenance costs by reducing the number of trucks that would otherwise be completing long-haul trips, which contribute to road and infrastructure deterioration.

Beyond the metrics identified in the RFI's Question 3, we encourage DOT to consider: travel time reliability, capacity demand relative to availability, throughput, cost of delay, redundancy and resiliency. We also encourage DOT to provide a framework for standardizing this data, which we believe would improve communication and planning between the private sector and public sector. The private sector and public sector must work together to move intermodal freight, but it is challenging when the two speak different languages without clearly defined and commonly agreed upon interpretations.

4. How can investment in freight transportation infrastructure best support industry and economic development? How could the NFSP help support public and private-sector investment in the freight system?

Investment in freight transportation infrastructure directly contributes to economic growth, domestic manufacturing, and supply chain resilience. The NFSP can support public and private investment by identifying nationally significant freight corridors and intermodal facilities that serve as economic drivers. Prioritizing projects that improve freight fluidity and efficiency – particularly at critical nodes like ports, rail terminals, and transfer points – will deliver demonstrable economic benefits.

However, inefficiencies in the infrastructure project permitting process have been a longstanding concern as they result in lengthy delays, cost increases, and significant uncertainty for project developers. Intermodal freight projects are particularly impacted by permitting delays as these projects connect modes of transportation and are often overseen by more than one modal administration or federal agency. Inconsistent procedures, requirements, and timelines across agencies complicate the permitting process at various stages of project development, delaying the

completion of critical intermodal freight projects.

Like project delivery, the speed of delivering federal funds impacts a project sponsor's ability to complete work on time and on budget. Federal competitive grant programs – such as the National Infrastructure Project Assistance program (Mega), Nationally Significant Multimodal Freight & Highway Projects program (INFRA), Port Infrastructure Development Program (PIDP), Railroad Crossing Elimination Program, and Consolidated Rail Infrastructure and Safety Improvements Program (CRISI) – are essential funding sources for intermodal freight projects, which are too complex for traditional formula distributions. IANA urges improvements to competitive grant programs that reduce application burdens, expedite grant agreements, and streamline funding delivery. IANA encourages DOT to adopt measures to streamline these processes, such as: limiting the page length of notices of funding opportunity; maintaining a public dashboard of funding opportunity timelines; publishing a template grant agreement at the time of award notice; and providing each grantee with a target date for grant agreement completion.

The private sector makes significant investments in freight infrastructure, both through public-private partnerships and through maintenance of privately owned and operated fixed assets. Not only do federal project and funding delivery delays drive up the cost of completion, but they also disincentivize private investment. While intermodal freight projects are a natural fit for public-private investment opportunities, lengthy, inefficient, and uncertain timelines are barriers to private capital. Schedules and timelines are integral to the operations of private sector companies, which require certainty regarding the terms and duration of their investments. If private funds are tied up for too long without a guaranteed return on investment, companies will be less likely to engage in future projects that involve public entities or federal funding. Many of these concerns can be alleviated by prioritizing permitting and funding delivery reforms.

- 5. What emerging operational or technological advances are likely to reshape freight movement over the next five years? What actions should public agencies take to enable or accelerate their adoption? How can DOT support greater private-sector investment, and what investment roles are best suited for public vs. private actors?**

New technological innovations in the freight transportation industry continue to emerge at a rapid pace. As discussed in the 2020 NFSP, the advent of Artificial Intelligence continues to make headlines in the freight transportation industry. It is likely to offer benefits to intermodal freight movement, such as route optimization, and opportunities for safety augmentation.

In most instances, the intermodal freight industry is best positioned to develop, test, and deploy these innovations to identify the most viable solutions. DOT can foster industry innovation by ensuring its regulatory framework remains flexible and reflects evolving best practices. Further regulatory streamlining, permitting improvements, and incentivization of pilot programs will allow the U.S. to maintain competitiveness in the global market and prepare for future trends and freight transportation needs.

- 6. What are the most significant regulatory, technological, procedural, institutional, or statutory barriers to freight system performance—especially at intermodal connectors and freight origin and destination points? How could the NFSP help identify or address these root causes?**

Recognizing that the national freight system is made up of both public and private entities, it is critical that federal policy ensures a regulatory approach that allows businesses to innovate and reduce operational barriers. Additionally, flexible federal funding through discretionary and formula programs with eligibility for intermodal freight projects is essential to the continued success of our freight system.

Intermodal Connectors: IANA encourages DOT to prioritize investments in National Highway System (NHS)-designated intermodal connectors. According to a 2017 study by the Federal Highway Administration (which is the most recent available), only 9 percent of intermodal connectors are classified as in good or very good condition; a staggering 37 percent were in poor condition. Despite constituting less than one percent of total NHS mileage, intermodal connectors provide necessary linkages to seaports, rail facilities, and airports that allow for seamless interaction between transportation modes and are essential to the movement of goods between points of origin and destination. The NFSP should identify Intermodal Connectors as a top federal investment priority and DOT should seek ways to incentivize intermodal connector investments by state departments of transportation.

Cargo Theft: Further impacting freight system performance is the alarming rise in instances of organized cargo theft and fraud. According to CargoNet’s annual analysis, reported cargo theft incidents rose 27 percent between 2023 and 2024 across the United States and Canada. Demonstrating the rise of premeditation, CargoNet estimates that instances of strategic theft – which involve the use of fraud and deception in addition to, or in place of, physically stealing cargo – have risen by over 1,500 percent since the first quarter of 2021. Criminals are becoming more sophisticated and emerging technologies, such generative AI, are being used to carry out cargo theft and fraud. We encourage DOT to monitor these trends closely and utilize their enforcement tools to combat the misuse of emerging technologies.

It is important to note that crime statistics represent *reported* theft, as the occurrence is not always reported for a host of reasons, including reputational brand management, tedious paperwork, fear of increased insurance costs, and low cargo recovery rates. Knowledge that cargo theft is vastly underreported leads to a wide span of loss estimates, ranging from \$455 million annually to several billion dollars.

A coordinated, national response is needed to address this growing threat by improving enforcement capabilities and fostering increased collaboration across relevant federal, state, and local agencies. We ask DOT to recognize this growing trend in the NFSP and, in its “strategic objectives,” to seek solutions.

It’s worth noting that the industry continues its own efforts to combat cargo theft and has voluntarily adopted several practices and technologies to discourage criminals. For example: intermodal containers are frequently equipped with global positioning systems (GPS) or radio-frequency identification (RFID) tags that provide location tracking; containers can also be equipped with advanced locks and door sensors that detect unauthorized openings and alert shippers; and railroads take steps to organize containers such that high-value goods are more difficult to access. Unfortunately, criminals have managed to match industry’s innovation. It’s time for recognition of this growing problem and a coordinated federal response.

Trucking Workforce: IANA encourages DOT to advance programs and regulations that support the retention of the existing trucking workforce and incentivize new drivers to enter the industry. Presently, drivers must be at least 21 years old to operate a commercial motor vehicle (CMV) in interstate commerce. This age barrier serves as a deterrent for 18-to 21-year-olds who are interested in entering the workforce. Frequently, these individuals undergo training and apprenticeship in other fields before their age qualifies them to operate a CMV in interstate commerce. IANA supports federal efforts that would allow drivers between the ages of 18 and 21 to enter the interstate workforce, while maintaining safety objectives.

The Infrastructure Investment and Jobs Act (IIJA) took a critical step in creating a career pathway for the next generation of interstate CMV drivers by establishing the Safe Driver Apprenticeship Program (SDAP) under the Federal Motor Carrier Safety Administration. The pilot program allows qualified younger drivers to operate in interstate commerce and ensures participants satisfy comprehensive training and safety standards. Unfortunately, the addition of extraneous requirements, beyond what is written in law, has hampered participation in the program by both motor carriers and drivers. To maximize the potential of the SDAP and the future trucking workforce, we encourage DOT to build on its important work under the IIJA by steering the program back on course and ensure it is implemented according to Congressional intent.

7. What strategies should DOT consider to strengthen the freight system’s resilience to natural disasters, economic shocks, or other disruptions? How should resilience be defined or measured, and what roles should Federal, State, local, and private actors play?

Unlike single transportation modes, the intermodal freight supply chain is comprised of separate entities that work in concert to complete each intermodal movement. Each link is a vital component of the overall supply chain and must operate seamlessly and efficiently to uphold systemwide performance and productivity levels.

Recent disruptions such as those resulting from the COVID-19 pandemic and the collapse of the Francis Scott Key Bridge in Baltimore have demonstrated the need for the freight network to quickly adapt and respond to route or facility closures, as well as changes in cargo demand, manufacturing capacity, and equipment availability. Establishing alternative routes, modes of transportation, and intermodal connections is critical to reducing the risk of a single point of failure causing extensive supply chain disruptions. The proactive assessment and inventory of these alternatives will help freight transportation providers maintain operational continuity during and after unforeseen events like natural disasters, accidents, or system failures.

DOT’s Office of Multimodal Freight Infrastructure and Policy is uniquely positioned to quickly convene the appropriate stakeholders, facilitate coordination between various federal agencies and public and private sector entities, and assist in the development of strategies to mitigate the immediate and long-term impacts of supply chain disruptions.

8. What unique impacts do freight movement and operations impose on rural and underserved communities? What strategies should DOT consider to mitigate any disproportionate negative impacts felt by these communities?

Rural communities are often the beneficiaries of highly functioning freight corridors and gateways,

which connect agricultural products to economies across the country and across the globe in a reliable and cost-effective manner. But at the local level, deficiencies in rural infrastructure – such as weight-restricted bridges – pose challenges to getting goods to market via the most efficient route. DOT’s Rural Opportunities to Use Transportation for Economic Success (ROUTES) Initiative provides a valuable resource for these communities to improve infrastructure and receive the benefit of DOT’s technical expertise.

9. How can DOT encourage multi-State or multi-jurisdictional coordination on freight planning, operations, and investments? In what role(s) would DOT be most effective in creating, sustaining, and optimizing the value of such cross-jurisdictional groups?

Many of the most significant freight corridors and routes cross state and jurisdictional boundaries and require unified planning, coordination, and prioritization. As noted in our comments above, federal competitive grants are instrumental in advancing multistate and multijurisdictional freight projects that would be challenging, if not impossible, to complete by a single state using formula funds alone. While formula programs – particularly the National Highway Freight Program – are important resources to fund smaller state-wide project needs, federal multimodal grant programs complement these efforts by targeting larger, more complex freight projects that often span multiple modes, states, or jurisdictions. We encourage DOT, within the NFSP and other national transportation planning tools, to continue prioritizing these critical projects through federal grant programs like Mega, INFRA, PIDP, and CRISI.

DOT can further seek to minimize cross-jurisdictional disruptions and improve coordination by ensuring consistency across regulations governing or impacting freight movement. Recent efforts by states to impose individual mandates on heavy-duty vehicle and railroad emissions threaten network fluidity and operational integration at the national level. Such a patchwork of regulations that vary by state would undermine the strength and efficiency of our multimodal supply chains, which rely on the seamless interstate movement of goods. While these specific regulations are not directly under DOT’s jurisdiction, IANA encourages the Department to consider these impacts when developing the 2025 NFSP and work with relevant federal agencies – such as the Environmental Protection Agency – to ensure any regulations related to freight transportation promote consistency, clarity, minimize disruptions, and reduce barriers to system efficiency.

10. How will an officially designated National Multimodal Freight Network help or influence the way public agencies plan and invest in the freight system? See 49 U.S.C. 70103. What are the most logical use cases for this network? How can the NFSP best support public and private supply chain stakeholders to understand trends and challenges better on this network?

A designated National Multimodal Freight Network (NMFN) can serve as a critical tool in identifying strategic freight routes and prioritizing infrastructure investments. A well-designed NMFN can be used for various purposes, including improved coordination between the public and private sector, identification of freight bottlenecks, and enhanced system planning across modes. The NFSP should leverage the NMFN to communicate key national priorities, support private sector investment alignment, and provide a framework for tracking freight performance and capacity over time. Following thoughtful consideration of stakeholder comments in response to this Request for Information, we encourage the Department to publish a finalized NMFN in conjunction with the NFSP.