

November 3, 2025

Mr. Daniel Watson
Assistant U.S. Trade Representative for the Western Hemisphere
Office of the United States Trade Representative
600 17th St NW,
Washington, DC 20508

Re: Request for Comments on the Operation of the Agreement between the United States of America, the United Mexican States, and Canada, Docket USTR–2025–0004

Dear Mr. Watson,

On behalf of the Intermodal Association of North America (IANA), the leading trade association representing the combined interests of the intermodal freight industry, I submit the following comments in response to the Request for Comments on the Operation of the Agreement between the United States of America, the United Mexican States, and Canada.

IANA represents more than 1,000 companies across the North American freight ecosystem, including railroads, motor carriers, ocean carriers, logistics firms, ports, equipment manufacturers, leasing companies, technology providers, and freight-beneficial owners. Intermodal freight is the backbone of cross-border commerce, connecting all major modes and enabling the seamless movement of goods throughout Canada, the United States, and Mexico. Its connectivity is fundamental to the success of the USMCA, with billions of dollars in trade flowing each month. Policy choices that strengthen border efficiency, regulatory alignment, and infrastructure modernization will yield substantial returns in competitiveness and economic resilience.

The North American trade environment is a critical competitiveness asset. Intermodal trade represents tens of billions of dollars of daily commerce enabled by freight infrastructure and operations. It demonstrates the scale and interdependence of trade within North America, a driver for economic output, job creation and supply-chain competitiveness.

As supply chains regionalize and industries reinforce continent-wide production networks, North American trade continues to expand. Current goods flows via the intermodal freight industry underscore the depth of economic integration across the USMCA partners:

2025 Cross-Border Goods Trade Flow (approx. YTD)

- Canada → Mexico: \$236.7 million
- Canada → United States: \$23.03 billion
- Mexico → Canada: \$886.5 million
- Mexico → United States: \$20.03 billion
- United States → Canada: \$23.88 billion
- United States → Mexico: \$9.84 billion

Policy Priorities to Strengthen USMCA Trade Performance

As the U.S. Trade Representative develops positions and recommendations for the Joint Review of the USMCA, IANA recommends the following broad areas of focus:

Enhanced Freight Efficiency

- Modernize and align customs documentation and inspection protocols.
- Expand shared digital systems, including electronic waybills and real-time freight visibility.
- Promote consistent enforcement of truck size and weight standards.
- Align rail equipment, safety requirements, and security protocols where feasible.

Border Infrastructure Investment

- Target federal investment in priority intermodal corridors and ports of entry.
- Support Public-Private Partnerships to accelerate infrastructure improvements.
- Deploy advanced inspection and security technologies that enhance safety, enable effective collaboration on security intelligence, and reduce wait times.
- Expand commercial staging capacity and fluidity at key land crossings.

Coordinated Resilience and Risk Management

- Establish shared disruption-response planning and communications protocols.
- Coordinate freight prioritization.

Integration of Performance Metrics

- Border clearance times.
- Dwell times at major gateways.
- Digital system interoperability milestones.

IANA appreciates the opportunity to comment and stands ready to support USTR and USMCA partners. For questions, please contact me at areinke@intermodal.org or 301-982-3400.

Sincerely,



Anne Reinke
President and CEO
Intermodal Association of North America