IANA
INTERMODAL ASSOCIATION OF NORTH AMERICA

President & CEO – Anne Reinke

February 25, 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–2025–0002

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 draft designation of the National Multimodal Freight Network; Docket No. DOT–OST–2025–0002.

IANA's membership roster of over 1,000 corporate members includes not only intermodal and over-the-road motor carriers but also 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 C Reinke

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President and CEO
Intermodal Association of North America

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Draft Designation of National Multimodal Freight Network

IANA commends the U.S. Department of Transportation (USDOT) for developing a draft designation of the National Multimodal Freight Network (NMFN) with a strong focus on advancing intermodal connectivity. This important step toward the designation of a final NMFN demonstrates the unique role and importance of USDOT's Office of Multimodal Freight Infrastructure and Policy in facilitating coordination among a diverse range of multimodal supply chain stakeholders, guiding the development of national freight policy and investment strategies, and supporting long-term planning efforts to ensure our freight system is optimally prepared for future needs and growing demand.

Globally, 95 percent of all manufactured goods travel in a container during their journey from origin to destination. Generating more than $59 billion annually, the North American intermodal market is essential in promoting job creation and economic growth. An effective NMFN offers a holistic, national perspective to goods movement that supports the allocation of resources to advance the smooth flow of goods across the country and across modes, minimizes congestion and delays, and enhances the overall competitiveness of U.S. supply chains. IANA was pleased to see that the draft designation incorporates many key elements to advance these goals. Specifically, IANA strongly supports the draft network's inclusion of National Highway System (NHS)-designated intermodal connectors, intermodal rail routes, as well as intermodal terminals and facilities.

Intermodal links and intersections may not stand out by volume or value alone but play a critical role in supporting system fluidity and accessibility. 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. Likewise, intermodal facility locations often differ from cargo origin and destination points but are equally important in assessing goods movement fluidity and capacity as well as significant freight routes, corridors, and hubs.

IANA further supports USDOT's efforts to identify designations that strengthen freight system resiliency and redundancy. 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.

Underscoring the importance of this effort, 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.

All Americans benefit from the safe and efficient movement of freight, and we appreciate USDOT's ongoing commitment to planning a system that will serve our national interests.