

June 22, 2015

The Honorable John Thune
Chairman
Commerce, Science, and Transportation Committee
United States Senate
Washington, DC 20510

RE: Support for the Port Transparency Act (S. 1298)

Dear Chairman Thune:

On behalf of the undersigned organizations representing manufacturers, farmers and agribusinesses, wholesalers, retailers, importers, exporters, distributors, transportation and logistics providers and other supply chain stakeholders, we are writing in support of the “Port Transparency Act” (S. 1298). This bill is an important first step to truly gain visibility into how U.S. ports are operating. We believe that establishing a port performance measurement and reporting program based on sound data will enable the responsible federal agencies to prepare meaningful annual reports on the performance and capacity of the nation’s key ports. Port performance data that facilitates rigorous analysis of America’s port business is an essential element in ensuring the nation’s commerce continues to flow efficiently.

U.S. container ports represent critical nodes on the intermodal freight network. Having efficient, modern ports is important for the free flow of international trade, both imports and exports. These ports represent a key component in the global supply chain that thousands of businesses and millions of workers depend upon. The highly negative economic impacts from the recent slowdowns and congestion at our West Coast ports caused by prolonged labor negotiations and other operational issues demonstrate how vital efficient ports are to the U.S. economy.

Unfortunately, many of the nation’s largest blue water container ports have become bottlenecks in recent years. Ports can experience slowdowns and congestion for a variety of reasons: weather, equipment shortages, labor strife and lack of infrastructure to name a few. As we witnessed on the West Coast, when a serious port disruption occurs, the impacts are far-reaching. Exporters lose customers overseas. Perishable products are destroyed. Manufacturers have to slow down or stop assembly lines because just-in-time inventory becomes impossible to manage. Retail goods are delayed or miss important selling seasons.

We all recognize that there are many reasons for the bottlenecks and delays. But frustrating the attempts to address and study these problems is the universal lack of good, empirical data on port congestion, efficiency, and throughput. The nation regularly collects comparable performance data on other components of the supply chain including freight rail movements and highways. The periodic highway “Condition and Performance” reports issued by the Federal Highway Administration are a model for the kind of statistical information that should be developed to assess U.S. port performance. But when it comes to ports – perhaps the single most important node in the intermodal transportation system for international trade – we must rely on anecdotal data. There is no common set of

standardized metrics which are collected and evaluated on a consistent basis. This bill takes an important step towards achieving that highly desirable goal.

The lack of good port operations data has hampered the ability of the business community to drive efficiencies at the nation's ports. The business community understands that good management of complex systems begins with good measurement and good data. Transportation and trade stakeholders agree that good, empirical data is the absolute first step in any effort to address complex congestion and infrastructure issues. While private efforts to move forward with developing port metrics are ongoing, we believe the nation as a whole would benefit if the federal government would collect and publish basic baseline information about port performance, such as cargo throughput and metrics that measure factors relating to congestion and delay. While the issues at each U.S. port are different, one universal set of data points would be enormously helpful in efforts to study and address costly bottlenecks at our nation's ports.

The bill also provides an important reporting requirement before and during port labor negotiations. While we all support the collective bargaining process, we must ensure that our ports operate at normal levels throughout a labor contract negotiation. As witnessed by the disruptions that impacted the West Coast ports recently, the impact on the economy can be devastating. We believe that the reporting required by the bill is essential to ensuring that operations remain at normal levels and to give key federal government agencies visibility into what disruptions are occurring.

U.S. ports are essential to the economy. With trade expected to continue to grow, as well as the issues impacting congestion, we need to start collecting basic data on port performance in order to ensure we fully understand the challenges facing our ports and are prepared to address the current and future congestion issues. We believe that the data collected as a result of S. 1298 will go a long way toward helping stakeholders address congestion and other issues that affect the efficiency of the international freight transportation system. We stand ready to work with you in support of this important legislation.

Sincerely,

Agricultural Retailers Association
Agriculture Transportation Coalition
Alliance of Automobile Manufacturers
Almond Hullers & Processors Association
American Apparel & Footwear Association (AAFA)
American Association of Exporters and Importers
American Cotton Shippers Association
American Chemistry Council
American Farm Bureau Federation
American Forest & Paper Association
American Frozen Food Institute
American Import Shippers Association
American Pyrotechnics Association
American Soybean Association

American Trucking Associations
Association of Food Industries
Auto Care Association
California Farm Bureau Federation
California Fresh Fruit Association
California Retailers Association
California Trucking Associations
California Walnut Commission
Chicago Customs Brokers and Forwarders Association
Columbia River Customs Brokers and Forwarders Association
Cookware Manufacturers Association
Customs Brokers and Forwarders Assoc. of Northern California
Customs Brokers and International Freight Forwarders of Washington State
Fashion Accessories Shippers Association (FASA)
Footwear Distributors & Retailers of America (FDRA)
Foreign Trade Association
Gemini Shippers Association
Global Automakers
Global Cold Chain Alliance
Green Coffee Association
Halloween Industry Association (HIA)
Harbor Trucking Association
Idaho Farm Bureau Federation
Institute of Makers of Explosives
Intermodal Motor Carriers Conference (IMCC)
International Association of Refrigerated Warehouses
International Refrigerated Transportation Association
International Wood Products Association
Juice Products Association
Juvenile Products Manufacturers Association (JPMA)
Los Angeles Area Chamber of Commerce
Los Angeles Customs Brokers and Freight Forwarders Association
Midwest Shippers Association
Motor & Equipment Manufacturers Association
Motorcycle Industry Council
National Alfalfa & Forage Alliance
North American Export Grain Association
National Association of Egg Farmers
National Association of Chemical Distributors (NACD)
National Association of Manufacturers
National Cotton Council
National Council of Farmer Cooperatives
National Customs Brokers and Forwarders Association of America (NCBFAA)
National Grain and Feed Association
National Oilseed Processors Association
National Onion Association

National Pork Producers Council
National Potato Council
National Retail Federation
National Strategic Shippers Transportation Council (NASSTRAC)
National Waste & Recycling Association
Naturipe Growers
New Jersey Motor Truck Association
New York/New Jersey Foreign Freight Forwarders and Brokers Association
North American Blueberry Council
North American Home Furnishings Association
Northwest Food Processors Association
Outdoor Power Equipment Institute
Pacific Coast Council of Customs Brokers and Freight Forwarders
Pacific Northwest Vegetable Association
Promotional Products Association International (PPAI)
Retail Industry Leaders Association
San Diego Customs Brokers and Forwarders Association
San Gabriel Valley Economic Partnership
Sunmaid Growers of California
Sunsweet Growers Inc.
The Hardwood Federation
The Institute of Scrap Recycling Industries, Inc. (ISRI)
The National Industrial Transportation League
The Waterfront Coalition
Toy Industry Association
Transportation Intermediaries Association
Travel Goods Association (TGA)
U.S. Apple Association
U.S. Chamber of Commerce
US Dry Bean Council
US Forage Export Council
US Hide, Skin and Leather Association
United Fresh Produce Association
United States Council for International Business (USCIB)
United States Fashion Industry Association
Washington Farm Bureau
Washington State Hay Growers Association
Washington Trucking Associations
Western Growers Association
Yankton Chamber of Commerce