

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