



A bold voice for transportation workers

November 15, 2012

Mr. Jack Wells
Chief Economist
Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**RE: Interim Guidance on State Freight Plans and State Freight Advisory
Committees
Docket No. DOT-OST-2012-0168**

Dear Mr. Wells:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am writing to comment on the Department of Transportation's (DOT or Department) Notice of Interim Guidance on State Freight Plans and State Freight Advisory Committees. By way of background, TTD represents 31 affiliated unions representing workers in all modes of transportation, including those engaged in the movement of freight.¹

TTD supports the Department's efforts to implement sections 1117 and 1118 of MAP-21 by encouraging states to develop State Freight Advisory Committees and State Freight Plans. We agree with the Department that freight transportation plays a vital role in our nation's economic strength, and believe that better coordinated efforts can generate economic benefits.

While we are encouraged by DOT's recommendations set forth in its interim guidance, we believe that states must specifically consider job creation and economic stimulus as they draft their freight strategies. We recognize that enhanced freight transportation will lead to the creation and preservation of jobs, but we believe that the creation of jobs must be a focus when states develop their plans. Toward this end, we support the addition of a twelfth recommendation – "Job Creation and Economic Stimulus" – specifically advocating that State Freight Plans proactively include strategies to create and preserve jobs and stimulate economic activity. Additionally, the recommendation to include employee representatives on State Freight Advisory Committees will provide states with the support and input they need to achieve this important recommendation.

¹ Attached is a list of TTD's affiliated unions.

Transportation Trades Department, AFL-CIO

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Edward Wytkind, President /Larry I. Willis, Secretary-Treasurer



States will maximize their potential for success when they formulate their Freight Plans by identifying and utilizing all viable modes of freight transportation. However, this has not always been the case. Maritime transportation, a major component of freight transport, has regrettably been long ignored in federal and state freight policy. Yet, our nation's maritime system and ports employ thousands of workers, and provide a critical link in the movement of freight.

Investing in rail and ensuring it's connected to ports and other hubs of commerce is important to successfully integrating a comprehensive freight network. By carrying heavy and sizeable loads efficiently, rail provides another option for transporting freight across our country. Continued improvements to intermodal infrastructure will enhance railroads' ability to connect with the larger freight network, and will enhance the effectiveness of a comprehensive freight system. Pursuing a multimodal approach will help create an environment conducive to establishing new routes to connect underserved regions, provide flexibility and greater shipping options for businesses, generate economic stimulus, and create jobs.

State Freight Advisory Committees and State Freight Plans, properly focused as suggested in our comments, can play an important role in ensuring that our national freight network efficiently integrates all sectors of our national transportation network. TTD appreciates the Department's efforts to provide states with guidance on developing their Freight Plans and Freight Advisory Committees, and we hope you will take our comments into consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edward Wytkind', with a stylized flourish at the end.

Edward Wytkind
President

TTD MEMBER UNIONS

The following labor organizations are members of and represented by the TTD:

Air Line Pilots Association (ALPA)
Amalgamated Transit Union (ATU)
American Federation of State, County and Municipal Employees (AFSCME)
American Federation of Teachers (AFT)
Association of Flight Attendants-CWA (AFA-CWA)
American Train Dispatchers Association (ATDA)
Brotherhood of Railroad Signalmen (BRS)
Communications Workers of America (CWA)
International Association of Fire Fighters (IAFF)
International Association of Machinists and Aerospace Workers (IAM)
International Brotherhood of Boilermakers, Blacksmiths, Forgers and Helpers (IBB)
International Brotherhood of Electrical Workers (IBEW)
International Longshoremen's Association (ILA)
International Longshore and Warehouse Union (ILWU)
International Organization of Masters, Mates & Pilots, ILA (MM&P)
International Union of Operating Engineers (IUOE)
Laborers' International Union of North America (LIUNA)
Marine Engineers' Beneficial Association (MEBA)
National Air Traffic Controllers Association (NATCA)
National Association of Letter Carriers (NALC)
National Conference of Firemen and Oilers, SEIU (NCFO, SEIU)
National Federation of Public and Private Employees (NFOPAPE)
Office and Professional Employees International Union (OPEIU)
Professional Aviation Safety Specialists (PASS)
Sailors' Union of the Pacific (SUP)
Sheet Metal Workers International Association (SMWIA)
Transportation · Communications International Union (TCU)
Transport Workers Union of America (TWU)
United Mine Workers of America (UMWA)
*United Steel, Paper and Forestry, Rubber, Manufacturing, Energy,
Allied Industrial and Service Workers International Union (USW)*
United Transportation Union (UTU)