



May 2, 2023

The Honorable Chairman Daniel B. Maffei
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, DC 20573

The Honorable Commissioner Carl W. Bentzel
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, DC 20573

The Honorable Commissioner Rebecca F. Dye
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, DC 20573

The Honorable Commissioner Max Vekich
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, DC 20573

The Honorable Commissioner Louis E. Sola
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, DC 20573

Chairman Maffei, and Members of the Commission:

On behalf of the [Commissioners of the Coalition for Reimagined Mobility \(ReMo\)](#), we applaud FMC Commissioner Carl Bentzel on his work to improve freight information flows through the Maritime Transportation Data Initiative (MTDI) and we share our support for the Recommendations on the Maritime Transportation Data System Requirements report, as it aligns closely with findings identified in ReMo's report, "[Solving the Global Supply Chain Crisis with Data Sharing](#)."

As a global initiative of [SAFE](#), a nonprofit, nonpartisan organization accelerating secure, resilient, and sustainable transportation and energy solutions, ReMo advances policies through applied research and advocacy in the U.S. and Europe to improve transportation systems and services for moving people and goods, making them more sustainable, more equitable, and more efficient.

We urge the Commission to continue advancing this important initiative and work towards ensuring appropriate data sharing in the maritime transportation industry. The initiative presents an opportunity to demonstrate global leadership in digitalizing marine shipping and aims to provide a much needed, long-term solution to manage unforeseeable disruptions and drive resilience throughout supply chains, significantly curtailing dependence on oil, reducing related greenhouse gas emissions and air pollution in port communities, and improving efficiencies across the sector.

The lack of resilience in the current system was on full display when the pandemic laid bare how unable supply chains are to nimbly respond to disruptions. Ships lined up for weeks outside ports, resulting in worse air quality for surrounding communities and unnecessary greenhouse gas emissions. The cost of goods went up due to constrained supply, and some vital goods couldn't be found at all due to supply chain bottlenecks. We should not wait for another crisis to create the tools for a more flexible, transparent, and responsive marine freight system.

Furthermore, by improving the reliability of freight information and democratizing access to it, the FMC can boost the attractiveness of the U.S. ports and logistics sector—bolstering U.S. competitiveness as a global maritime trade partner and setting the stage for allies and other countries to follow suit and improve resilience across the freight value chain.



The vital work led by Commissioner Bentzel to convene and engage stakeholders across the freight sector has helped identify essential operational data points – a minimum viable data standard – that are needed to inform more efficient decision-making on cargo movements. In an industry riddled with inefficient, manual, and paper-based processes, the benefits of a digital transformation are very significant and wide-reaching. Our report, *Solving the Global Supply Chain Crisis with Data Sharing* showed that standardizing data exchange would result in tremendous cost savings, less dependence on oil, increased operational efficiencies, and a 22 percent reduction in greenhouse gas emissions. Improved data flow would also vastly improve coordinated responses by the freight industry when disruptive events happen. These cost and fuel efficiencies are drawn largely from more efficient routing, and higher utilization of existing assets and infrastructure.

By focusing on maritime transportation, through which 90 percent of global freight is moved, the Federal Maritime Commission's work will not only reduce costs and emissions from ocean-borne freight, but will deliver major benefits to the entire supply chain. For example, drayage companies and truck drivers moving cargo through ports will have access to more accurate, reliable and timely information, and be able to plan container pick-ups and drop-offs more effectively, drastically reducing idle time. The ability to improve fleet management and truck dispatching will in turn reduce congestion and improve air quality in port-adjacent communities.

There is still more to be done. Beyond the FMC, federal agencies should work together to coordinate and streamline data sharing approaches. To address the systemic challenges preventing standardized data exchange, U.S. government agencies should convene and work with the freight sector to establish—and mandate when needed—industry-wide data sharing standards, and ensure funding is available to get all stakeholders to the level of technological sophistication needed. The technology to enable standardized data exchange is readily available now and is being adopted successfully by other industries. Adoption by the maritime freight system would yield almost immediate benefits for people, businesses, and the planet. This is especially important for a sector whose longer-term decarbonization solutions like alternative fuels or vessel propulsion systems remain decades away from commercialization.

Ignoring the critical importance of maritime data standards and data exchange poses risks that go beyond the sustainability of the supply chain. For example, China has already created its own National Transportation and Logistics Public Information Platform (LOGINK), a one-stop shop for logistics data management, shipment tracking, and information exchange. The U.S.-China Economic and Security Commission has pointed out that LOGINK is sharing this data with Chinese government entities, posing economic and strategic risks for the United States and its allies and trading partners.

We applaud your work to modernize freight transportation, and stand ready to support your efforts on this important mission. To support the global economy, the planet and our collective national security, we urge the Commission to promulgate regulations that implement the report recommendations of the Maritime Transportation Data Initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "CWeydig".

Christine Weydig
Executive Director
Coalition for Reimagined Mobility (ReMo)