



COALITION FOR
Reimagined Mobility

Transportation Policy that Puts People First

June 17, 2024

Re: Docket No. FMC-2023-0016
Federal Maritime Commission Request for Information

Dear Sir/Madam,

The Coalition for Reimagined Mobility (ReMo),¹ a global initiative of the organization SAFE, applauds the Federal Maritime Commission (the Commission) for continuing their efforts to improve maritime data transmission, accessibility, and accuracy. Having provided comment for the previous Request For Information (RFI) (88 FR 55 697) closing on October 16, 2023,² we welcome the opportunity to respond to the above-captioned RFI and continue informing the direction of the Maritime Transportation Data Initiative (MTDI). Our organization's support for the MTDI's goals remain steadfast, and we applaud the initiative's continued focus on data accuracy.

As an organization that convenes essential stakeholders across the public and private sectors for timely dialogues that drive collaboration, solutions, and a greater understanding of the opportunities and challenges within the global transportation system, we commend the MTDI's explicit focus on input from directly impacted supply chain stakeholders who are moving containers through marine terminals and that have the most to gain from improved communication and the open exchange of timely, accurate data.

ReMo examined how standardized data exchange in the freight sector can improve the resiliency and efficiency of global supply chains in the report, [Solving the Global Supply Chain Crisis with Data Sharing](#) as well as the follow on publications, [Establishing Data Standards for the Global Freight Sector](#) and [The Importance of Data Standards and Interoperability in Global Supply Chains](#). By embracing digitalization and standardizing the exchange of freight data, stakeholders can drive system-wide operational efficiencies that reduce emissions, overall costs, and dependence on oil. [ReMo's research](#) found that improved data exchange can significantly reduce emissions caused by idling, congestion, and unnecessary fuel usage resulting in a 22% emissions reduction and a 40% reduction in pollutants in port communities through improved coordination facilitated by data exchange. Reducing idling and congestion has cost implications too; freight stakeholders can save 6% in costs from fuel savings alone.

¹ ReMo brings together industry CEOs, public sector leaders and practitioners across transportation, technology, and sustainability to advance public policy and real-world solutions to improve the movement of people and goods worldwide. The Coalition is part of SAFE, a bipartisan, nonprofit accelerating the real-world deployment of secure, resilient, and sustainable transportation and energy solutions that enhance the country's economic and energy security. For more information, visit <https://reimaginedmobility.org/>

² For ReMo's full comments on the initial RFI, visit <https://www.regulations.gov/comment/FMC-2023-0016-0019>

In our response to the Commission's MTDI report and RFI 88 FR 55 697, ReMo identified how complications from the COVID pandemic exacerbated the existing shortcomings of the freight sector's ability to share accurate data on the movement of goods, specifically in a maritime port setting. We made recommendations as to how to address those shortcomings in the initial round and seek to build upon those recommendations to drive MTDI's goal to improve the data accuracy for shipping entities.

Improving Data Accuracy by Adopting Data Exchange Standards

The foundation for high-accuracy freight sector coordination is a common language. The accuracy of data collected is irrelevant if that information cannot be effectively communicated across the international ocean transportation supply chain. Developing and upholding freely available data exchange standards creates a common language for communicating near real-time operational data on cargo movements. Simply put, creating standard methods for the documentation and sharing of data digitally provides the relevant supply chain stakeholders access to accurate and reliable information to make more efficient decisions.

As ReMo's issue brief [*The Importance of Data Standards and Interoperability in Global Supply Chains*](#) explains, creating a shared language dramatically improves data accuracy, as well as access and interoperability. The maritime and intermodal stakeholders across this supply chain currently rely on a patchwork of email, phone calls, and other, often antiquated, legacy technologies to obtain usable data on timing as to when shipments are moving through marine terminals. Such an antiquated system is unacceptably inaccurate and inefficient and comes at a cost to people and businesses.

Furthermore, this common language guarantees interoperability — where information can be incorporated into diverse databases and software applications for a shared understanding of what the data means and represents. Improving supply chain stakeholder communication and data accuracy through data exchange standards lowers the barrier for innovation, driving healthy and competitive marketplaces, and creating a foundation for the freight sector to reap the benefits of digitalization and next generation technologies.

Data standards that are open, freely available, and accessible lead to higher quality data, and better data has a real impact on shaping more sustainable, efficient, and resilient systems that move containers through marine terminals and cargo around the world.

Implementing Data Exchange Standards

In [*Establishing Data Standards for the Global Freight Sector*](#), ReMo looked at real-world examples of the development, adoption, and ongoing management of transportation-related data standards to inform the development of similar standards for international ocean supply chain stakeholders. There are several considerations the Commission should account for to implement the goals of the MTDI in a manner that maximizes sector-wide data accuracy benefits and avoids unnecessary burdens for industry players, all the while incentivizing widespread adoption:

- Make standards open and freely accessible. Prioritize interoperability and innovation. Give industry the common language they need to develop and implement sector-wide standards.
- Build up an ecosystem of standards, starting with targeted standards that solve specific problems. Tackling smaller problems individually allows for expedited iterative development and can quickly evolve into a network of standards that improve accuracy sector-wide.
- Utilize industry expertise. Allow industry software developers to build solutions that tackle individual needs using a common language. A heavy-handed approach will only make industry disengage. Give them the tools they need to solve their own problems.

ReMo applauds the Commission's dedication to allow directly impacted supply chain stakeholders to drive this conversation. Solutions must be grounded in the needs of industry, and we encourage the Commission to implement MTDI recommendations in a way that accounts for international ocean transportation stakeholders of different sizes, technical competencies, and needs.

Our primary objective in submitting these comments is to assist the Commission in their efforts to inform possible future Commission activities with a focus on data accuracy and information related to containers moving through marine terminals. ReMo welcomes the opportunity to answer any further questions with officials from the Commission and help advance efforts through its research, and the MTDI to improve maritime data transmission, accessibility, and accuracy.

Sincerely,

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