



August 20, 2025

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Office of the Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Docket No. DOT-OST-2025-0468

Dear Secretary Duffy:

The Consumer Brands Association (“Consumer Brands”) submits these comments in response to the request for public comments issued by the Secretary of Transportation in preparation for the next surface reauthorization bill.

Consumer Brands champions the U.S. manufacturing industry, whose products Americans depend on every day. Consumer Brands represents nearly 2,000 iconic brands that make up the U.S. consumer packaged goods (“CPG”) industry, from manufacturers of household and personal care to food and beverage products.

The CPG industry plays a vital role in powering the U.S. economy; it sustains 22 million American jobs, making it America’s largest manufacturing sector based on employment and it contributes \$2.5 trillion to the U.S. GDP annually. In some states, jobs in the CPG industry alone represent up to 20 percent of total employment in each state.

The CPG industry accounts for approximately one fifth of all freight in the United States. Companies represented by CBA include some operating the largest private truck fleets in the nation, while others utilize a variety of trucking services and third-party logistics providers to transport their goods to major retailers, local businesses, distribution warehouses and dining establishments across the country. Rail, maritime and the full gamut of intermodal freight services are likewise essential to the CPG industry’s vast, far-reaching supply chains, which stretch from raw agricultural products to end consumers’ homes. This scope and inherent reliance on transportation services provides the industry unique visibility to U.S. freight needs, infrastructure conditions and overall performance.

As such, our industry knows all too well that efficient, resilient supply chains are critical to the continued growth and success of our industry as well as the health of our economy. Consumer

Brands is pleased to submit the following comments outlining key programs that will help contribute to the secretary's vision for a more modern transportation system. We believe that strategic investment

Increasing capacity of Freight Logistics Optimization Works (FLOW)

The Department of Transportation's Freight Logistics Optimization Works (FLOW) is a critical public-private partnership among industry and government to build a forward-looking, integrated view of supply chain conditions in the United States. FLOW data helps forecast how current capacity and throughput will fare against future demand, helping participating companies anticipate changes in supply chain throughput and take proactive step to mitigate previously unanticipated delays.

Partnerships between the public and private sectors, like those seen among FLOW members, enable a deeper understanding of the capabilities and constraints each face, a greater likelihood of achieving the desired outcomes of each and strategic leveraging of the knowledge and vision each brings to the table for mutual benefit.

As you are likely aware, the Office of Multimodal Freight Infrastructure and Policy (OST-F) is slated to receive increased funding in Fiscal Year 2026. This increased funding is a critical first step that will yield demonstrable returns for initiatives in this office, including FLOW.

FLOW is an already low-cost tool and each dollar invested will likely go further and do more than other department initiatives. As the department considers opportunities for investment and seeks to strengthen public and private partnerships, we respectfully urge the office of the secretary to consider FLOW as a tool in the efforts to modernize, streamline and strengthen America's supply chains.

To that end, Consumer Brands recommend increasing OST-F staffing and funding in order to ensure adequate capacity as well dedicating additional funding to FLOW directly. Presently, staff are limited in their ability to facilitate program development and growth—increased resourcing is critical to realize FLOW and other OST-F initiatives to their fullest potential.

Additionally, Consumer Brands recommends utilization of new and emerging technologies within FLOW and throughout the department, such as Artificial Intelligence (AI)-supported data monitoring tools. AI tools, and other new technologies, will not only improve efficiencies, but also ease administrative and analytical strain on employees, allowing them to focus on larger-scale planning and strategy. FLOW offers a unique vehicle for new technology testing—large-scale data aggregation and analysis is the perfect arena to test, develop and refine new technology for broader application.

FLOW is already a transformative freight and supply chain initiative but remains under-funded and under-appreciated. With the right combination of investment, capacity, and utilization of new technologies, FLOW has the potential to be as impactful as Air Traffic Control was for air travel.

At its core, FLOW represents numerous opportunities to modernize, streamline and strengthen America's supply chains. With the right combination of resourcing and strategic vision, this tool is an engine for innovation. The possibilities are numerous: from a national freight data portal, predictive AI-powered analysis, long-range forecasting, exporter data networks and much more.

Reforms to Modernize Federal Truck Weight Laws

As the Department of Transportation considers its priorities for surface transportation reauthorization, the Consumer Brands recommends that the Department support modernization of truck weight laws. The last change to the Gross Vehicle Weight (GVW) limit was in 1982, and numerous advancements in truck technology and vehicle safety since then necessitate imminent change.

The current 80,000 pound GVW limit creates needless inefficiencies—requiring trucks to be sent out when they are only partially-filled. This means more trucks are needed for a given amount of freight than is truly necessary. A modest increase to the GVW limit, combined with an added axle and required bridge formula compliance, would protect roads and bridges, advance safety and allow for data collection. Vehicles meeting those conditions would allow the same amount of freight to be carried in fewer trips without increasing vehicle size, while reducing congestion, and making our roads safer.

We recommend a voluntary pilot program that would allow the operation of trucks under carefully crafted conditions at a modestly higher GVW limit. States in the pilot program can, by permit, allow vehicles with at least six axles to operate on the Interstate System within their borders with divisible loads at up to 91,000 pounds GVW subject to conditions. It would require participating states to gather certain safety data from those permitted to operate and report to USDOT. Compliance with the Federal bridge formula and axle weight limits is required in order to protect roads and bridges. Lastly, this pilot program does not increase vehicle size, and the reform is limited to single combination vehicles.

This pilot program has been thoroughly vetted including by the House Transportation and Infrastructure Committee, which advanced the proposal out of the Committee on a bipartisan basis in the last Congress.

For additional information and background on this recommendation, please refer to comments submitted by the Shipper's Coalition.

Truck Parking

Aside from GVW limits, Consumer Brands acknowledges the need for improvements in the freight system, including solving the nationwide truck parking shortage. Consequences of limited truck parking expand far beyond efficiency challenges for businesses.

Persistent shortages of truck parking result in rippling effects across the supply chain, impacting overall system-wide performance, driver availability and network capacity. Parking shortages also contribute to safety issues that endanger drivers and disincentives the career path entirely.

A 2016 American Transportation Research Institute (ATRI) study found that drivers lost up to 56 minutes daily searching for parking, resulting in an average loss of 9,300 revenue-earning miles per year (roughly \$7,000 in income). This compresses driving and working time, ultimately leading to lost driver capacity and decreased utilization.

Limited truck parking also presents a number of safety issues for everyone on the road. Over the next decade, trucks will be tasked with moving 2.4 billion more tons of freight than they do today, which means more trucks and an even greater need for parking.

Consumer Brands is supportive of efforts to inject flexibility into the CDL knowledge testing process and applauds recent increases in funding for the creation of more truck parking spaces.

Conclusion

Consumer Brands thanks the Department for its consideration of the recommendations outlined above and in comments submitted on by the Shipper's Coalition. Our industry and its partners are deeply committed to ensuring healthy, resilient supply chains and improved highway safety. We look forward to continued engagement with the department as you work towards surface reauthorization.

Sincerely,



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