

August 3, 2016

Ms. Patricia Hu
Director, Bureau of Transportation Statistics
U.S. Department of Transportation
1200 New Jersey Avenue S.E.
Washington, D.C. 20590
portstatistics@dot.gov

Dear Ms. Hu,

At the July 15, 2016 meeting of the Port Performance Freight Statistics Working Group, there were three questions posed to the working group in which feedback was requested. Below, please find the Retail Industry Leaders Association's (RILA) responses to these three questions to assist the Working Group as they determine nationally consistent measures of performance of the nation's largest ports. These responses are informed by input from our members.

RILA is the trade association of the largest and most successful companies in the retail industry. RILA promotes consumer choice and economic freedom through public policy and industry operational excellence. RILA members include more than 200 retailers, product manufacturers, and service suppliers, which together account for more than \$1.5 trillion in annual sales. RILA members operate more than 100,000 stores, manufacturing facilities and distribution centers, have facilities in all 50 states, and provide millions of jobs domestically and worldwide.

1. How should BTS define the different types of ports and their boundaries?

Depending on the level of granularity, it is possible to identify several different port types, including Container, Bulk, Grain, liquid, Ro-Ro (cars, equipment), other specialized freight, and so forth. Because of the differing nature of cargo moving through various types of ports, there are slight variations in relevant metrics, however the basic structure to measure capacity, throughput, and productivity remains similar. As the retail industry deals almost exclusively in container shipping, the following responses refer to container operations, with the awareness that other types of shippers may have somewhat different interests.

2. What nationally consistent measures would you recommend for:

> Capacity?

As described above, the measures outlined below are from the perspective of container shipping, with the awareness that other types of shippers may have somewhat different interests. In some cases, ports/terminals currently track some of these (or similar) metrics already.

Due to the variability in operations, the capacity of a terminal is based on a number of conditions that are unique to that specific terminal. Ports and terminals all differ in their layouts and operations, and therefore cannot be reliably or justifiably compared. Instead it is more informative to understand each port/terminal individually, based on descriptive measures in order to gauge the operational improvements of each. The general, descriptive measures for background/overview profile for each port/terminal include:

- Berths capacity statistics (including number, size, etc.)
 - Crane capacity statistics (including number, height, move capability, etc.)
 - Number of gates
 - Yard capacity statistics (including space on-the-ground and vertical stacking)
 - Presence and extent of on-dock rail
-

A key input for optimizing supply chain flow is understanding the volume at a port/terminal against the maximum capacity at any point in time. The active measures that give a more dynamic picture of capacity and help render utilization rates include:

- Yard capacity availability/utilization (over time) and operating maximum (percent of maximum)
- Annual cargo volume (TEUs for container shipping; other units as appropriate for type of shipping)
- Chassis availability (utilization, by terminal, total pool size, and percent out of service)
- Average vessel turn time

> **Throughput?**

As described above, a key measure is the current volume as a percentage of maximum capacity (as established by the port/terminal). The metrics below help define that activity. In some cases, ports/terminals currently track some of these (or similar) metrics already.

- Time of container availability from vessel arrival (average and performance over time)
- Average container dwell time for import and export containers (definitions/locations of “dwell” e.g. vessel arrival to container discharge, discharge to gate out, discharge to loaded on rail)
- Truck turn time (gate and queue; average and weekly performance over time) and gate moves per hour; single and dual transactions
- Container “touches”

3. How should BTS go about collecting and reporting nationally consistent measures?

A standard platform for collecting port data via automatic electronic data interchange (EDI) and making it available via an accessible internet site should be a longer-term goal, to improve visibility. Data from the standard platform may be kept in a central repository, accessible by the public and the shipping industry. In the interim, collection of data can be as basic as distributing a standard spreadsheet to the participating ports, which they can complete and return to DOT on a predetermined schedule. Once compiled and analyzed, these can be released in an annual report as directed by the FAST Act, and be readily accessible by the public by publishing online. Though the FAST Act outlines an annual report to Congress, reporting of industry-determined metrics would be more beneficial on a more frequent basis—as frequently as stakeholders can agree to do so.

In closing, RILA commends the launch of the Bureau’s work on this topic, and welcomes the opportunity for further, active engagement with the Port Performance Freight Statistics Working Group. If you have any comments or questions about these responses, please do not hesitate to contact me.

Sincerely,



Jennifer M. Safavian
Executive Vice President, Government Affairs
Retail Industry Leaders Association
1700 N. Moore Street, Suite 2250
Arlington, VA 22209
(703) 600-2057 – direct
(703) 201-0745 – cell
jennifer.safavian@rila.org