March 26, 2020

Acting Administrator Jim Mullen  
Federal Motor Carrier Safety Administration  
United States Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

Dear Acting Administrator Mullen,

On behalf of the Association of Equipment Manufacturers (AEM) and the Transportation Intermediaries Association (TIA) we urge you to ensure that goods falling into essential categories, as laid out in the Cybersecurity and Infrastructure Security Agency’s Guidance on Essential Critical Infrastructure Workforce, do not face delivery impediments as a result of individual state emergency orders during the COVID-19 crisis.

The Association of Equipment Manufacturers represents more than 1,000 companies and supports 2.8 million jobs throughout the United States. AEM members serve in the agriculture, construction, utilities, mining, and forestry sectors of the economy contributing $288 billion to GDP.

The Transportation Intermediaries Association represents the interests of 1,800 member companies and the $215 billion third-party logistics industry over 70 percent of which are small, family owned companies. TIA is the only organization representing transportation intermediaries to shippers, carriers, government officials and international organizations and is the U.S. member of the International Federation of Freight Forwarder Association (FIATA).

AEM and TIA understand and support the actions that governors are taking to protect the health and wellbeing of each states’ citizens. However, the patchwork of individual state decisions is wreaking havoc on freight shipping across the nation. Because of the rapidly changing state landscape, there is real concern that goods shipped from one jurisdiction to another will be denied delivery due to state closure orders by the time the shipment reaches its final destination. This presents an unfortunate choice for the shipper and their suppliers of returning the product or having the trucking company store the product until it can be delivered (when possible).
Both of these options are costly and not sustainable particularly during this crisis when companies are using the liquidity they have to retain employees and keep the lights on. Likewise, confusion over individual state orders as well as the fear of potential unexpected costs could result in the cessation of shipping critical goods by some firms until normal conditions return.

A national standard should be established to allow all goods that fall into essential categories to continue to be shipped and delivered throughout the duration of the COVID-19 crisis. We ask you to work with states and obtain commitments to not create any artificial barriers to the transportation of these products and work in a coordinated fashion to ensure the safe shipment of goods from manufacturing facilities to retailers. These coordinated efforts will help guarantee that critical areas of the economy can continue to function, and ensure that governors can protect their citizens while also helping to mitigate harm to the economy.

Our industries appreciate the continued work that you are doing to keep America moving during this unprecedented crisis and we look forward to working with you to create interstate freight policies that can work for all stakeholders.

Sincerely,

Dennis J. Slater
President
Association of Equipment Manufacturers

Robert A. Voltmann
President & CEO
Transportation Intermediaries Association