



we wearSM transportation

November 15, 2012

The Honorable Ray LaHood
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**RE: Solicitation for Comments on DOT Interim Guidance for MAP-21
(Docket Number DOT- OST-2012-0168)**

Dear Secretary LaHood,

On behalf of the American Apparel & Footwear Association (AAFA), I am submitting the following comments in response to the request by the Department of Transportation for stakeholder input on DOT interim guidance regarding the implementation of Section 1117 and Section 1118 under the Moving Ahead for Progress in the 21st Century Act (MAP-21).

AAFA is the national trade association representing apparel, footwear, and other sewn product companies, and their suppliers, which compete in the global and domestic market. Our membership consists of 380 American companies which represent one of the largest consumer segments in the United States. The apparel and footwear industry overall represents \$380 billion in annual domestic sales and sustains more than four million American jobs.

The establishment of a comprehensive National Freight Policy is essential for a robust economy and the ability of American companies to stay competitive on the global market. As it stands, intermodal goods movement across the United States suffers from a lack of directed and thoughtful investment in critical infrastructure. Whether they touch down in our ports, highways, or railroads, efficient movement of goods is absolutely necessary for our industry and every other industry that drives the American economy to stay afloat. AAFA supports the freight provisions established in MAP-21 aimed toward this goal.

For this reason, we applaud the important first steps taken towards an informed National Freight Policy through the implementation of MAP-21 Section 1117, advising States on the establishment of State Freight Advisory Committees, and Section 1118, encouraging States to develop comprehensive State Freight Plans for later incorporation into a National Freight Policy. AAFA would like to highlight in a positive manner several recommendations contained in the DOT interim guidance on top of the minimum criteria for State Freight Plans and Advisory Committees under MAP-21:

- States holding discussions on the role that freight transportation plays in the State's overall economy, identifying which industries are most important to the State
- Identifying statutory and constitutional restraints on freight-related investments and policies, such as prohibitions on spending State funds for certain kinds of freight infrastructure

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-Discussing regional freight planning activities in which the State participates, such as planning for key multi-state freight corridors

-Avoidance of States using performance measures (meant to guide freight-related transportation investment decisions of the State) that are not of direct importance to users and the general public (e.g. number of bridges inspected each year)

-Inclusion of an analysis of the existing strengths and weaknesses of the State's freight system

-Discussing the State's decision making process on freight transportation improvements in order to show how improvements to different modes of transportation were coordinated to achieve goals

-The inclusion of private infrastructure stakeholders in State Freight Advisory Committees, such as shippers, freight forwarders, freight-related associations, and independent transportation experts

AAFA strongly encourages the Department of Transportation to continue as planned and include these recommendations to States for their State Freight Plans and Advisory Committees. Only through a process where the significant and necessary factors of a State's infrastructure are properly identified and all relevant inputs are considered may an informed National Freight Policy be eventually developed.

Thank you for this opportunity to submit comments. The U.S. apparel and footwear industry, along with virtually every other significant contributor to the U.S. economy, relies on its ability to transport goods efficiently to remain competitive in the global marketplace. These proposed recommendations for State Freight Plans and State Freight Advisory Committees will provide excellent information and assets for the development of a National Freight Policy that will keep our economy moving as well.

Sincerely,

A handwritten signature in black ink that reads "Kevin M. Burke". The signature is written in a cursive, flowing style.

Kevin Burke
President and CEO
American Apparel & Footwear Association (AAFA)