

**American Association
of Port Authorities**
Jean Godwin
(703) 684-5700

**Amer. Assn. of State Highway
and Transportation Officials**
Leo Penne
(202) 624-5813

**American Trucking
Associations**
Darrin Roth
(703) 838-1900

**Association of
American Railroads**
Jennifer Macdonald
(202) 639-2533

**Association of Metropolitan
Planning Organizations**
Deborah Singer
(202) 296-7051

**Coalition for America's
Gateways and Corridors**
Leslie Blakey
(202) 828-9100

**Inland Rivers Port and
Terminals Association**
Deidre McGowan
(601) 352-4778

**Intermodal Association
of North America**
Joni Casey
(301) 982-3400

**National Association
of Manufacturers**
Keith McCoy
(202) 637-3175

**National Association of
Regional Councils**
Fred Abousleman
(202) 986-1032

**National Association of
Waterfront Employers**
Paul Bea
(202) 587-4821

**The National Industrial
Transportation League**
John Ficker
(703) 524-5011

National Retail Federation
Alison O'Donnell
(202) 626-8193

Retail Industry Leaders Assn.
Paul Kelly
(703) 841-2300

U.S. Chamber of Commerce
Janet F. Kavinoky
(202) 463-5871

Waterfront Coalition
Robin Lanier
(202) 861-0825

World Shipping Council
Anne Kappel
(202) 589-1235

FREIGHT STAKEHOLDERS COALITION

September 21, 2006

Department of Transportation
Federal Highway Administration

RE: Comments in the matter of NPRM for Projects of National and Regional Significance Evaluation and Rating – Proposed Changes to 23 CFR Part 505; Docket No. FHWA-05-23393

The members of the Freight Stakeholders Coalition consisting of public and private sector transportation providers and consumers have worked closely with Congress and the Department of Transportation on the development of policies and programs to improve the nation's freight system. The comments submitted on this proposed rulemaking are provided in the continued spirit of cooperation established during the development of SAFETEA-LU, which created this new and important program for freight projects. We commend the Federal Highway Administration (FHWA) and the Department of Transportation for undertaking to establish rules for this new program even though all funds appropriated in the current authorization have been fully allocated to projects specified in the legislation. In taking this step, we believe the FHWA can position the program as an important and meaningful tool to address some of the many physical and operational challenges that face the nation's transportation system in the years ahead.

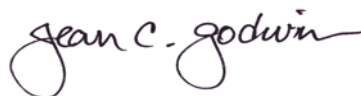
We find the proposed criteria for evaluation in Section 505.9 to be substantive and consistent with the Coalition's members' views that such criteria enable an objective evaluation of projects competing for limited federal dollars. Coalition members strongly endorse the use of such criteria in the future when determining the projects that are awarded funding under this program.

We ask the FHWA to consider a clarification of the disparity between its proposals to "include those projects that are intended to be multi-modal" as expressed in Section 505.5 Definitions in the Section-by-Section Discussion of the Proposals and the actual Criteria for Grants outlined in Section 505.9. The latter does not include a requirement that the proposed project be multi-modal but rather outlines the need to demonstrate specific benefits that the project will deliver. The Coalition concurs with this approach. Although members recognize that the size and scope of any eligible project makes it likely that such projects would be multi-modal, we do not favor exclusion of projects that are single mode if they can meet the criteria found in the proposed Section 505.9.

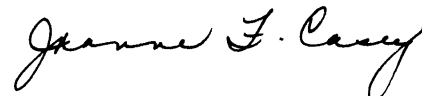
The Coalition member associations, on behalf of their individual member companies, appreciate the work undertaken to date at the federal level to elevate the priority of collectively solving the country's freight transportation problems as a critical component of sustained economic growth. We embrace continued collaboration at all levels and within all branches of government.

Thank you for the opportunity to submit these comments, which we hope you find beneficial. Please do not hesitate to contact us with any questions or should you require further clarification of anything stated herein.

Very truly yours,



Jean C. Godwin
Co-Chair
Freight Stakeholders Coalition



Joanne F. Casey
Co-Chair
Freight Stakeholders Coalition