

Public Comments for FMC-2026-0067

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The central argument across all five recommendations is the same: the commercial logistics technology sector has already built the data infrastructure needed to validate and expand the Commission's containerized freight statistics. The FMC does not need to construct new interagency arrangements, build internal verification systems, or negotiate voluntary agreements with terminal operators. That work is done. What the Commission needs to do is simple: add two fields to the 3072-0074 reporting schema, and procure commercial data validation services from a provider with the connections already in place.

Response:

We have reviewed the public comment on 3072-0074. The FMC views the recommendations as a risk to ocean carrier proprietary information, excessive burden on the maritime industry, and outside the scope of what the OSRA mandate requires. The proposed mandatory MBL and container number fields would transform vessel-level aggregate reporting into container-level shipment tracking, substantially increasing compliance costs and exposing competitively sensitive operational data.