

Federal Maritime Commission
Title: Container vessel imports and exports.
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Comment from Persistence Analytics Group LLC:

Comment on FMC-2026-0067

Containerized Freight Statistics — Imports and Exports

Persistence Analytics Group LLC / United Grid submits this comment regarding the Federal Maritime Commission's information collection for Containerized Freight Statistics — Imports and Exports.

PAG / United Grid supports continued collection and publication of aggregate containerized freight statistics. Import/export tonnage and loaded/empty TEU data can provide important visibility into U.S. trade flows, port utilization, supply-chain conditions, logistics resilience, and infrastructure planning.

However, the value of this collection should not be judged only by whether data are collected and reported quarterly.

It should be judged by whether the data are useful enough to support decision-grade visibility into maritime freight conditions without imposing unnecessary burden or exposing commercially sensitive operational information.

PAG / United Grid recommends that FMC evaluate the collection through an infrastructure-assumption and supply-chain resilience standard:

1. Practical utility

The data should help policymakers, ports, shippers, carriers, infrastructure planners, and national-security stakeholders understand changes in container flows, loaded versus empty movement, export capacity, and import dependency.

2. Infrastructure readiness

Containerized freight data should support analysis of whether port capacity, inland

transportation, warehousing, chassis availability, rail access, and drayage systems can absorb changing trade patterns.

3. Supply-chain resilience

Quarterly reporting should help identify stress signals, including imbalances between loaded and empty containers, persistent export constraints, concentration risk, or changes in carrier activity affecting U.S. supply-chain reliability.

4. Avoiding excessive granularity

FMC appropriately recognized that container-level shipment tracking could increase compliance cost and expose competitively sensitive operational data. Vessel-level aggregate reporting should remain focused on statutory purpose and not become unnecessary shipment-level surveillance.

5. Data quality and comparability

FMC should ensure that carrier submissions use consistent definitions for tonnage, loaded TEUs, empty TEUs, import/export treatment, vessel identification, and reporting period so trends can be compared across time.

6. Public usefulness

Published reports should be presented in a way that supports practical analysis by ports, public agencies, infrastructure planners, supply-chain users, and researchers without overstating what the data prove.

7. Burden discipline

The collection should continue to minimize unnecessary reporting burden, particularly where data can be submitted through automated, standardized, or existing carrier reporting systems.

8. Resilience indicators

FMC should consider whether the quarterly report can support basic resilience indicators, such as loaded-export share, empty-container imbalance, vessel-level concentration, port-level flow stress, or changes in carrier service patterns.

The broader principle is simple:

Freight data should not merely count movement.

It should help verify whether the assumptions behind port capacity, supply-chain reliability, export competitiveness, and infrastructure readiness are holding.

Containerized freight is critical infrastructure. Weak visibility into freight flows can leave public agencies and private actors reacting after congestion, imbalance, or disruption has already hardened.

PAG / United Grid recommends continued approval of this information collection, with emphasis on data quality, public utility, burden discipline, commercial confidentiality, and infrastructure-readiness value.

The collection should help answer:

What is moving?

Where are imbalances forming?

Which trends affect port and inland infrastructure?

What assumptions about supply-chain resilience are being confirmed or weakened?

What public or private decisions should be informed by the data?

Maritime visibility is not only a trade issue.

It is an infrastructure-resilience issue.

Respectfully submitted,

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National Security & Infrastructure Risk Analytics

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Response:

We have reviewed the public comment on 3072-0074. The recommendations, while valuable, are currently outside the scope of the Ocean Shipping Reform Act of 2022 (OSRA 2022) gathering requirement and would require expanded collection to support the recommendations adequately, increasing burden.