

Comment on Docket DOT-OST-2026-0893

Renewal of Information Collection: Freight Logistics Optimization Works (FLOW) | OMB Control No. 2138-0049

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Executive summary

This comment supports renewal of the FLOW information collection and presents a narrow, implementation-ready set of low-burden additions that could make the program more immediately useful for day-to-day freight decisions. The central point is straightforward: the current collection already covers the right operating domains - purchase orders, bookings, terminal space, gate transactions, truck dispatch capacity, chassis availability, and warehouse capacity - but the notice understandably says less about how those inputs are translated into leading indicators. This comment therefore proposes a small layer of standardized summary indicators that can be derived from the same operating data and that may be more actionable for terminals, carriers, 3PLs, and warehouse operators than average capacity snapshots alone [1]-[4].

1. Scope and framing

FLOW is designed as a voluntary, secure, government-industry information-sharing program. The March 2026 notice states that BTS uses the program to collect operational freight information from businesses across the freight system, protects the submitted data under CIPSEA, and provides aggregated and deidentified measures intended to serve as leading indicators of freight congestion, supply-chain performance, and oversupply or undersupply of logistics assets [1]. DOT's public FLOW page similarly describes a daily, aggregated network view that combines future demand information with regional supply and throughput data across ocean, truck, and rail, allowing participants to make proactive operating adjustments [2].

This comment stays within that frame. It does not propose that FLOW become a general incident database, a safety reporting program, or a large new respondent burden. It presents a smaller adjustment: a more explicit signal layer built around distributions, threshold breaches, exception counts, and asset stress ratios. The examples below are offered from a freight-risk analytics perspective and are intended to be operational rather than academic.

2. The analytical gap is not data coverage; it is signal definition

The notice already identifies the operational inputs that matter: terminal space, gate activity, truck dispatch capacity, chassis availability, and warehouse capacity [1]. The related 2022 FLOW notice also described the original concept in similar terms and stated that those data would be used to create an index of demand over capacity as a leading indicator [5]. What remains less explicit is how FLOW distinguishes a system that is busy from a system that is becoming fragile.

FHWA's reliability program offers a useful precedent. FHWA notes that average values do not tell the full story, because travelers and shippers experience day-to-day variation and remember the unexpectedly bad days rather than the annual mean [3]. BTS's own Port Performance Freight Statistics documentation follows the same logic in an adjacent domain: for dwell-time analysis, BTS calculates summary statistics that include both mean values and distributions [4]. The same idea appears well suited to FLOW. A terminal, drayage market, or warehouse network can look stable on an average-capacity basis while its upper-tail delays and exception counts are already moving in an unfavorable direction.

3. A low-burden indicator package that could fit the existing collection

A practical enhancement would be to define a short, standardized package of summary indicators. These would sit on top of the current collection rather than replace it. They could be derived by BTS when the underlying timestamps or counts are already available, or submitted as summary values when participants already produce equivalent internal weekly metrics. Either route keeps the focus on practical utility while limiting burden, which is consistent with the PRA framework described by OMB [6].

Indicator	Illustrative FLOW domain	Reporting level	Operational value	Added work
Delay percentiles (P50/P90/P95)	Gate turn time, container dwell, dispatch wait, warehouse release lag	Weekly by asset class and region	Shows widening tails while averages remain flat	Low
Threshold exceedance rate	Share above 2h gate wait, 72h dwell, or another published threshold	Weekly	Produces a simple alert variable and trend line	Low
Exception-event counts	Unscheduled gate closures, dispatch cancellations, equipment shortage events, overflow events	Weekly	Preserves event context without narrative reporting	Low
Asset stress ratio	Requested/available chassis, dispatch slots, dock windows, or storage capacity	Weekly	Tracks oversupply/undersupply directly	Low
BTS-derived spillover analytics	Lead-lag relationship across terminal, drayage, warehouse, and rail series	Internal BTS analytics	Captures propagation without new respondent fields	None

A fifth line item in the table, spillover analytics, is intentionally listed as a BTS-derived product rather than a respondent-reported field. That is deliberate. The strongest operational value may come from cross-series analytics - for example, whether a rise in gate-tail delays is consistently followed by a rise in dispatch delays or warehouse exception counts in the same corridor. Those relationships can be estimated within BTS from aggregated series and do not require participants to report an additional 'spillover' variable.

4. Examples that make the proposed signals operationally legible

The practical value of these measures becomes clearer when they are expressed as operating interpretations rather than abstract metrics.

Observed signal	Likely interpretation	Illustrative management use
P95 gate turn time rises for two weeks while the mean stays roughly unchanged	Tail congestion is building at the terminal interface before average throughput visibly deteriorates	Review appointment windows, gate staffing, and drayage sequencing
Dispatch-delay exceedance rate doubles in one region	Truck-side strain is emerging even if aggregate available capacity still looks adequate	Shift pickup commitments, stagger demand, or pre-book additional drayage
Requested/available chassis ratio remains above 1.10	Shortage pressure is persistent rather than episodic	Reposition equipment or tighten release priorities
Warehouse exception counts rise while terminal dwell stays steady	The bottleneck appears landside rather than at berth or gate	Adjust receiving labor, dock appointments, or storage allocation

5. A burden-conscious implementation path

The current notice estimates 21 hours per respondent annually, with a material share of that total associated with manual portal uploads for participants that do not automate submissions [1]. For that reason, any refinement is more credible if it reduces manual handling as it adds analytical value. One implementation path would be:

- Publish a short codebook for four respondent-facing summary indicators: delay percentiles, threshold exceedance rates, exception counts, and asset stress ratios.
- Allow two reporting routes: (a) BTS-derived calculation from fields already supplied; or (b) participant-supplied weekly summary values where that is operationally simpler.
- Provide a machine-readable template and a lightweight validator so participants can test format, threshold identifiers, units, and sample-size rules before submission.
- Offer an optional API endpoint for higher-maturity participants so that enhanced reporting reduces manual effort rather than increasing it.
- Evaluate the resulting series against existing BTS and public datasets after collection rather than asking FLOW participants to supply accident files or roadway-failure records directly.

The last point is especially important. Accident records, roadway failure records, and other public safety datasets are already collected elsewhere. A cleaner division of labor would keep respondent reporting inside the operational freight lane and allow BTS to compare aggregated FLOW outputs, where useful, with existing public incident datasets after collection. That preserves scope, keeps the voluntary model intact, and avoids asking private respondents to recreate public reporting systems.

6. Why this fits the notice

The March 2026 notice asks the public to comment on four things: necessity, burden accuracy, ways to enhance quality and usefulness, and ways to minimize burden without reducing information quality [1]. This proposal aligns closely with that structure. It does not argue for a broader or more intrusive collection. It accepts the existing collection as directionally sound, and it presents a tighter definition of the output layer that may improve practical utility. That is also consistent with the OMB view that PRA review involves balancing burden against practical utility and using the least burdensome means of obtaining the information needed for agency functions [6]. GAO has long emphasized that better supply-chain information can improve DOT's freight efforts and national freight decision-making [5].

Conclusion

In short, FLOW already appears to have the right operating scope. A stronger next step would not be more raw reporting. It would be a more explicit, standardized signal layer built from the same kinds of operational inputs that FLOW already collects. Delay distributions, threshold exceedance rates, exception counts, asset stress ratios, and BTS-derived spillover analytics appear to offer a practical way to increase usefulness while remaining attentive to respondent burden.

Selected references

- [1] Federal Register. Agency Information Collection Activities; Renewal of a Previously Approved Information Collection: Freight Logistics Optimization Works (FLOW), 91 FR 10198 (Mar. 2, 2026). <https://www.federalregister.gov/documents/2026/03/02/2026-03996/agency-information-collection-activities-renewal-of-a-previously-approved-information-collection>
- [2] U.S. Department of Transportation. Freight Logistics Optimization Works. Updated Oct. 24, 2024. <https://www.transportation.gov/mission/office-secretary/office-policy/freight/flow/freight-logistics-optimization-works>
- [3] FHWA Office of Operations. Travel Time Reliability Measures. https://ops.fhwa.dot.gov/perf_measurement/reliability_measures/index.htm
- [4] Bureau of Transportation Statistics. Port Performance Freight Statistics Program Technical Documentation. <https://www.bts.gov/PPFS-Tech-Docs>
- [5] U.S. Government Accountability Office. West Coast Ports: Better Supply Chain Information Could Improve DOT's Freight Efforts (GAO-17-23), 2016. <https://www.gao.gov/products/gao-17-23>
- [6] Office of Management and Budget. Managing Information Collection and Dissemination: OIRA Paperwork Policy Report. See discussion of practical utility, least burdensome collection, and respondent burden. https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/assets/OMB/infoereg/paperwork_policy_report_final.pdf
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