



Agricultural Marketing
Service

Transportation and
Marketing Program

Transportation
Economics Division

1400 Independence
Avenue SW
Stop 0266
Washington,
DC 20250

July 28, 2026

Edward Strocko, Acting Director
Bureau of Transportation Statistics
Office of the Assistant Secretary for Research and Technology
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: DOT-OST-2026-1387, “Shaping the Future of the Bureau of Transportation Statistics”

Dear Mr. Strocko:

The U.S. Department of Agriculture (USDA) commends the U.S. Department of Transportation’s (DOT) Bureau of Transportation Statistics (BTS) for undertaking this review of its product portfolio. BTS [framed the Request for Information \(RFI\)](#) as an effort “to help define the next decade of national transportation data”—a goal USDA strongly supports—as the transportation landscape evolves, new technologies emerge, and supply chains shift. Few sectors have more at stake in that effort than agriculture, which depends on every mode of the freight system to move inputs to producers and to carry the resulting commodities and food products to domestic and export markets. Agricultural transportation has changed dramatically over time, as documented by the [June 25, 2026, Grain Transportation Report \(GTR\) special feature](#) marking the Nation’s 250th anniversary. BTS data are embedded throughout USDA’s analysis of agricultural freight movements, and the Department has a direct interest in a well-modernized BTS portfolio.

Within USDA, the Agricultural Marketing Service (AMS) serves as the Department’s focal point for agricultural transportation (7 CFR § 2.79), and has long recognized that usable, accessible data are essential to efficiently moving agricultural products from farm to market. AMS welcomes the modernization priorities set out in the RFI, such as shifting toward more frequent, forward-looking indicators; adopting new data sources and analytical methods; and sustaining the benchmark programs on which timely indicators depend. As DOT has recognized, agriculture is “[one of the largest users of the U.S. freight network](#).” Therefore, the agricultural perspective is key to developing data tools that meet national freight needs. The comments below address the RFI’s questions on which USDA’s expertise and stake are greatest—organized by theme, with the relevant question numbers noted at each heading.

How USDA Relies on BTS Data (Questions 1, 3, and 7)

CFS and FAF Provide Crucial Truck Insight but Lack Granularity. BTS products are embedded in AMS’s recurring analytical work. The Commodity Flow Survey (CFS), conducted with the U.S. Census Bureau, is one of the few Federal data windows into truck movements of agricultural products. Drawing on the CFS and the data products derived from it, AMS analyzes agricultural-truck-shipment patterns, identifies bottlenecks, and supports research on supply-chain resilience. [AMS-funded research published in 2024](#), for example, used CFS data to map cross-country flows of refrigerated trucks hauling perishable meat and prepared foods.

The CFS is also the primary input to BTS’s Freight Analysis Framework (FAF), produced with the Federal Highway Administration and Oak Ridge National Laboratory. FAF data provide the only view of agricultural freight—including farm-based shipments—that is publicly available, nationally comprehensive, differentiated by route, and multimodal (*including* truck). With these data, AMS traces where farm commodities move and how those flows change over time. Because

FAF captures modal share across truck, rail, water, air, and pipeline, the data also support analysis of how different commodities depend on particular modes and where modal flexibility exists. AMS draws on both CFS and FAF to produce public reporting and market analysis—for example, to provide State-level context on how lanes and modal demand shift as grain inventories rise and fall across the crop year.

AMS believes these analyses would be sharper still with more granular commodity information. At the level of FAF’s 2-digit Standard Classification of Transported Goods, SCTG 02 (“cereal grains”) does not distinguish corn (SCTG 022) from wheat (SCTG 021). Further, soybeans (SCTG 034) are grouped into SCTG 03 (“agricultural products”) with fruits, vegetables, and other products that have very different supply chains. Even the 3-digit SCTG level is too coarse for some agricultural commodities: for instance, SCTG 071 (“dairy products”) groups together significantly different products (e.g., milk, cheese, ice cream, and butter). Given that the CFS collects commodity information from respondents at the 5-digit level, releasing greater commodity detail (e.g., 3- or 4-digit level), where disclosure limits allow, would substantially improve agricultural analysis.

Tracking Cross-Border Rail Service Issues. Next, BTS’s Census-derived TransBorder Freight data, together with the related Border Crossing/Entry data, have likewise proved invaluable, particularly as shippers have faced crises or near-crises at the Nation’s land borders. In 2024, more than two dozen [agricultural trade associations voiced concern](#) to U.S. Federal officials that “rail service capacity issues in Mexico...are hindering U.S. agricultural trade,” amid Ferromex embargoes that had rationed service to U.S. grain exporters. On the northern border that same year, [crucial commodity flows](#) were endangered by a brief Canadian rail shutdown, following weeks of labor uncertainty and a ten-day preemptive wind-down of operations. This outage was a significant exposure, given that Canada supplies roughly 85 percent of U.S. potash imports (predominantly by rail) and is a leading destination for U.S. exports of ethanol and other grain products. To analyze each of these episodes (in both cross-border corridors), AMS drew on BTS data, as no other public source combines modal, commodity-level, and gateway-specific detail in a single series.

The preceding list is only a sample of the ways BTS data tools inform AMS products, such as the weekly *GTR*. The continued production, timeliness, and methodological stability of BTS data are vitally important to USDA and to the agricultural stakeholders we serve.

Closing the Trucking Data Gap (Questions 3, 5, and 8)

Need for Quality Data, on Par With Other Modes. Among the modes that carry agricultural freight, [trucking is the most used](#) and the least visible in the Federal statistical system. Trucks travel the first and last mile for nearly all agricultural products and are the dominant mode for perishables, livestock, locally marketed grain, and farm inputs such as fertilizer. Yet the public data describing how much moves by truck, where, and at what cost are far thinner than for any other mode. Rail volume and service metrics are captured through Surface Transportation Board reporting; barge movements through U.S. Army Corps of Engineers’ lock and waterway data; ocean movements through vessel and trade statistics. AMS also collects monthly [public rail tariff rates](#) and [weekly spot \(and forward\) barge rates](#) for grain. For trucking, no comparable, timely, public Federal series on rates and volumes exists (other than for fruits and vegetables, as discussed below). CFS and FAF provide invaluable structural benchmarks, as described above, but they carry no rate information and are produced too infrequently to track current conditions, and the TransBorder data capture only cross-border movements.

Need for Timely Truck-Rate and -Volume Data—Across Commodities. AMS collects and publishes some truck rate and volume data, but they are limited to only select commodities and time periods. For instance, AMS’s Specialty Crops Program provides a comparatively [detailed weekly view](#) of refrigerated fresh fruit and vegetable trucking, including spot truckload rates by origin and destination market, truck availability

by region, and shipment volumes by origin and commodity. These data offer useful, near real-time, lane- and origin-level insight for fresh produce markets. However, for other major agricultural commodities (e.g., grain, fertilizer, dairy, livestock, and meats/poultry), no comparable public Federal series on truck rates and volumes exists. AMS's grain truck data, published in the quarterly [Grain Truck and Ocean Rate Advisory](#), provide useful, but much more limited information: quarterly rates and availability, with no corresponding truck-volume series. As a result, there is no timely, cross-commodity, equipment-specific public Federal series that captures agricultural truck movements at the level increasingly needed for marketing and supply-chain decisions.

Potential for Boosting Efficiency and Competition in Trucking. The trucking data gap matters because efficient agricultural markets are founded on timely public data. Shippers and carriers rely on data to decide where, when, and in what amounts to commit limited resources. More and better information improves outcomes by clarifying opportunities, making risk more manageable, and lowering costs. The lack of more public commodity truck-rate series (other than for fruit and vegetables) forces much of the agricultural sector to plan and negotiate with limited visibility. At the same time, the more comprehensive rate information that does exist is largely proprietary and prohibitively costly for all but the largest market participants. Public Federal data would level the playing field—giving the broader community of cooperatives, smaller shippers, and producers the same baseline visibility their larger counterparts already possess.

Need for Market-Specific Truck Spot Rates. BTS already republishes aggregated commercial truck spot rates (for dry vans, flatbeds, and refrigerated trucks) in its [Supply Chain and Freight Indicators](#). Although AMS values those data, they reflect general freight, rather than conditions in specific agricultural markets. For example, the existing series miss hopper trucks for grain; milk tank trucks (bulk milk pickup tankers); dry-bulk and tank trucks for fertilizer; and specialty livestock trailers. Truck data for these agricultural markets are fragmented and largely proprietary, and in some cases, not available at all. Adding agriculture-specific series would materially improve industry and Federal decision-making.

Milk is among the most economically regulated agricultural commodities, and adequate transport data are crucial for how regional milk prices are calculated and administered. Today, a notable void for both industry and government is created by the absence of public, standardized indicators for milk-trucking costs. Agricultural stakeholders have pointed to these gaps. A [2023 Farm Credit East report](#) documents, “There are limited public data available on the milk hauling sector.” Furthermore, [2023 testimony](#) for a [national USDA hearing](#) from the National Milk Producers Federation indicated industry had to rely on general trucking proxies (e.g., IRS mileage rates and diesel prices) to approximate milk hauling conditions, owing to the lack of a standardized milk-hauling index. A similar gap appears in livestock: a University of Nebraska extension economist [observed](#) that transportation-cost data are “generally lacking” and often must be derived from commodity price reporting (i.e., using differences between delivered and free-on-board cattle prices to infer premiums or discounts). Although commercial freight data can sometimes support isolated analyses (e.g., [proprietary refrigerated lane rates](#) were used in a [regional 2023 USDA hearing](#)), these data are not publicly available. Further, they are not specific to agricultural commodities—precisely where standardized indicators are needed.

As BTS shifts toward more frequent and forward-looking indicators, AMS encourages the Bureau to treat truck freight as a priority candidate for portfolio expansion. In particular, AMS would like to see timely statistics (i.e., monthly or more frequent) on truck rates and volumes—data broken down by region and equipment type. If feasible, an even more useful dataset would further differentiate the data by commodity and corridor with coverage of both spot and contract movements. DOT's 2026 [National Freight Strategic Plan](#) (p. 97) indicates that FLOW has “plans to expand to exports, domestic movements, and bulk cargo”

(emphasis added). Thus, FLOW offers a promising framework for assembling that picture, and AMS welcomes those future expansions.

Restoring Forward-Looking Data on Container Availability (Questions 2 and 5)

A second priority for consideration of BTS's portfolio expansion is public "container availability metrics," which agricultural markets have lacked for years. From 2012 to 2017, AMS published the [Ocean Shipping Container Availability Report](#) (*OSCAR*), a weekly report of the ocean containers available for export loading across roughly 18 major U.S. intermodal locations. Compiled from data voluntarily submitted by ocean carriers, *OSCAR* provided a forward-looking, location- and equipment-specific view of where agricultural exporters could find the empty containers they depended on for their shipments.

Data of this kind—especially, forward-looking data—strengthen the market as a whole. As noted above, timely information underpins efficient agricultural markets: a regular forward view of container availability lets shippers and carriers anticipate constraints before they arise. With solid information, shippers and carriers can arrange inland transport, schedule loadings, commit sales with confidence, and match cargo to equipment, rather than discover mismatches after the fact. *OSCAR* served this function for containerized agricultural exports. *OSCAR* also provided a publicly available picture, benefiting smaller agricultural exporters who otherwise lacked such visibility.

AMS suspended the report in early 2018 after consolidation in the ocean-carrier industry reduced the number of reporting carriers below the level at which any individual carrier's data could be kept confidential. The report did not lapse because exporters had stopped needing it. It lapsed because a forward-looking series resting on a small, voluntary set of reporters is structurally fragile. When the reporting base thinned, we could not sustain the series.

During the supply-chain disruptions of 2021 and 2022, [agricultural exporters struggled to obtain containers and equipment](#), as carriers prioritized returning empty boxes to overseas markets. At the same time, a call for restarting *OSCAR* or building an equivalent came from agricultural stakeholders, including the U.S. Dairy Export Council and National Milk Producers Federation ([April 2022](#)), and the Maritime Transportation System National Advisory Committee ([June 2023](#)). The demand for the series was clear. The open question was where it could be housed so that it would endure.

AMS believes BTS could steward a long-term project like *OSCAR*, as a natural extension of FLOW. FLOW pools supply- and demand-side data across the full container ecosystem (e.g., ports, terminals, ocean carriers, railroads, equipment providers, and importers), and BTS returns only aggregated, anonymized views to participants. BTS's [March 2, 2026 renewal notice](#) suggests many of the data underlying *OSCAR* may already fall within FLOW's scope: "Participants contribute data on import and export containers and the availability of space and assets to move the containers." A container-availability product could, therefore, be a natural extension of FLOW, rather than a new collection—likely requiring only modest additions where the data are already in scope. FLOW's broad, multi-source base would be far less exposed to the fragility of thin participation that ended *OSCAR*.

One feature of *OSCAR*—its public accessibility—is essential to preserve in any successor. FLOW's shared views are presently available only to its participants, so a container-availability metric that stayed inside the participant portal would reach the largest carriers and shippers, but not the smaller exporters and producers who most depend on a public-facing picture. AMS, therefore, encourages BTS to deliver any agricultural container-availability metric as a public product, and commends the ["in-progress efforts to apply and include FLOW data in public data products."](#) If these efforts are directed toward an *OSCAR* successor, they could restore not only *OSCAR*'s forward-looking information—missing since 2018—but also its public accessibility.

Conclusion and Continued Engagement (Question 16)

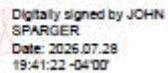
The recommendations below reflect AMS's dual vantage point—as an extensive user of BTS data and as a producer of agricultural transportation data. The recommendations concentrate on the areas where AMS's experience bears most directly on BTS's modernization. AMS respectfully recommends that BTS take the following actions:

- **Prioritize truck freight for portfolio expansion.** Develop timely (monthly or more frequent), public, regional, equipment-specific statistics on truck rates and volumes. Also, ideally, differentiate the data by commodity and corridor, and include spot and contract movements. FLOW could be a natural home for these data.
- **Build forward-looking, publicly available container-availability data.** As FLOW expands toward exports and bulk cargo, develop a forward, location- and equipment-specific view of export-container availability. Deliver these data as a public product so that the whole agricultural community benefits. This upgrade would restore the visibility *OSCAR* once provided, while setting the new product on a footing built to endure.
- **Increase level of commodity detail in FAF.** Distinguish major agricultural commodities—such as corn, wheat, soybeans, and dairy products—at a more granular level than the current 2-digit SCTG groupings. Consider releasing the added detail at a coarser view of geography, if disclosure protections would otherwise limit releasing more granular commodity data.

Underlying each of these recommendations is the benchmark infrastructure—the CFS and FAF—on which timely, forward-looking indicators ultimately depend. AMS encourages BTS to sustain those foundational programs even as it modernizes around them.

AMS would welcome the opportunity to carry this conversation forward. Our transportation analysts work with BTS data regularly and would gladly provide any assistance needed, such as identifying the agricultural locations, commodities, and equipment types most relevant to the priorities above. We appreciate BTS's consideration of these comments and its continued stewardship of the Nation's transportation data. We look forward to participating in the post-comment briefing described in the RFI. Please contact us (Adam.Sparger@usda.gov; PeterA.Caffarelli@usda.gov; Jesse.Gastelle@usda.gov) if you have any questions or if we can be of assistance.

Sincerely,

**JOHN
SPARGER**  Digitally signed by JOHN
SPARGER
Date: 2025.07.28
19:41:22 -04'00'

John Adam Sparger
Director
Transportation Economics Division