



ITEM #	ORG	POC	COMMENT	JUSTIFICATION	SDDC ADJUCIATION RESPONSE
#1	TRANSCOM	Mr. Rob Stewart Mr. Blackford Mr. Hansen Ms. Hemphill	No Comment No Comment No Comment No Comment		No response required.
#2	NSWG-2 LOGSU-2	David M. Jarosz Ordnance Transportation Manager Murray Road, BLDG. 772 JEB Little Creek-FT. Story Virginia Beach, VA 23456	Change that weekends and holidays count as transit times after pickup.	Most TSP's deliver way within Standard Times	Weekends and holidays will not change or count towards transit time calculations.
#3	Naval Sea Systems Command	Curt Bender Logistics Management Specialist Transportation Doctrine and Policy N32 NAVSUP Weapon Systems Support 757-512-4470	Change from: Oversize, overweight, or HAZMAT shipments that have movement constraints (i.e., daylight movement only). Change to: Oversize, overweight or HAZMAT shipments that have movement constraints (i.e., daylight movements only and/or other highway permit related restrictions).	Include highway permit related restrictions as valid exception to the DoD Standard Transit Time Guide.	Change made.
#4	DoD/Government/Kodiak Senior Executive	Lonny R. Bower Carlile Transportation Systems, LLC - Alaska State NDTA President	l.c.i should read: Remote sites (including Alaska) and any location/site accessible by ferry. We are good with the DDP/SNS transit times. Our main concern is the application of single driver transit times from Alaska	Remote sites and any location/site accessible only by a ferry. Alaska is unique in that over 90% of DoD freight (including surface carrier freight) is moved in/out via ocean transport. For single driver freight Alaska should be exempt from transit times.	Change made with the exception of remote locations names. Our Security Office requested the names of remote sites not be identified.
#5	 ROADMASTER GROUP Driving Excellence	Donald Welchoff, Jr Executive Vice President Tri-State and AATCO	Proposed changes create unreasonable transit times, possibly impacting public safety beyond SDDC's concerns of the products lingering in public domain. Carriers are governed by DOT / FMCSA regulatory scheme through the Hours of Service demands as established by 49CFR and must travel within those parameters. Proposed transit times could work if receiving facilities were open weekends and holidays; day or night, accepting freight upon arrival. SDDC may instruct facilities to do so but they have admitted in the past that they do not have the authority to enforce by overriding the facility commanders. To have drivers arrive at facilities that are closed or cannot receive the shipment puts undue stress on the drivers not having access to food or showers. In an already challenging environment for attracting drivers many carriers will decline shipments that put their employees in a like environment. Facilities will force carriers to drop their freight upon arrival and ask for drivers to return at a later date if the location is closed or cannot unload the shipment because of staffing issues. This ties up a carrier's asset/trailer with no compensation or forces a layover w/power for the company that does not get paid to the carrier. Drom rates will increase to AO level and LTL to truckload levels due to additional costs to the carrier. Proposed transit times on drom eliminates the time necessary to consolidate freight to one conveyance, basically removing the dromedary transport option from DoD. This will cause possible 8 more trucks on the road for the same amount of that would be transported by one drom train. This will increase the accident exposure rate for the DoD for the additional number of shipments being transported in a single convenience.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.
#6	 ArcBest MORE THAN LOGISTICS	Ron Ducharme, Executive Director-Enterprise Solutions	Our ABF brand represents the <u>LTL mode</u> which will be impacted as well but a little differently. Here is how I see it playing out (all things being equal as it relates to installation behaviors): Current DOD transit times are more generous than what carriers typically advertise, on average by about a day. LTL service is not guaranteed so meeting an RDD that is on or before the RDD could cause an issue.	Summary: 1. If RDD's are managed properly, there will be more requests for EXP moves (by LTL carriers to get guaranteed transit). Costing the DOD more money.	Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.

			Some installations use an EXP code to get guaranteed service when the RDD matches or is one day less than a carriers internal advertised transit time. Although carriers do not hit these 100% of the time, they have a very high success rate.	2. If RDD's are not managed properly and there is not enough time for a carrier to meet the RDD, then there will be an increase in CPM activity and potential non-use...which would reduce capacity for the DOD. This would happen if the EXP service is not requested.	1. EXP is an accessorial service shippers can request a TSP to guarantee delivery before the required Standard Transit Time (DTR, Chapter 202 and Item 5, DoD Standard Transit Times in this section), within legal parameters, such as speed, Hours of Service, etc. For Expedited Service, TSPs are permitted to pick up additional cargo along the route, unlike EXC. 2. When the Required Delivery Date (RDD) is less than DOD standard transit time, EXP is required to be annotated on BL. If not specifically annotated on the BL, the TSP is authorized to invoice for EXP. Shipments must be delivered by the RDD for EXP to apply. 3. When the RDD is set in accordance with DOD standard transit time, EXP will not be authorized for early delivery of shipments. 4. The use of Extra Driver (EXD) (see Item 37) shall not be requested in conjunction with EXP to meet a RDD. 5. Charges: a. EXP(1) \$ per mile per vehicle. b. EXP(2) percent of line haul.		
			There are instances where shipments are tendered as LTL with an RDD that is not possible to meet. And the EXP code is not used to close this gap. These issues will increase now that transit times will be reduced. Some installations will use the CPM to address missed RDD's. This is going to increase. Increased complaints can lead to increased non-use which would not be good for the DOD in this unprecedented tight capacity market.	3. There will be more work for carriers administratively as it relates to the TFG. More RDD compliance issues will create this additional work.	Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.		
			The responsibility of the carrier to manage the TFG for deliveries is not practical. Carriers have a handful of people that have GFM access and the carrier employees that need this (we have 250 service centers) do not have it. It is not practical to have that many people accessing. This issue is somewhat mitigated by the current transit times as we can often hit the RDD's through normal movement....without getting into the TFG.	4. I have 32 years with ArcBest and the current market is the busiest I have seen. For the first time in our company's history, we had an embargo for inbound freight to GA and TX a few days after the winter storm. We were the last LTL carrier to issue an embargo. LTL networks are heavily strained...ALL carriers are behind and vacation season is coming, which will make it worse. We and other carriers are hiring as much as we can but we also have a lot of retirements. The PMI index is super strong, a leading indicator for the rest of the year.....so the timing of transit time changes is not ideal.	TSPs must conform to the consignee's TFG delivery instructions. 1. TSP will review the TFG for installation policies regarding the minimum requirements for normal operating hours, installation closures, or any other important information. In the event that CAS (Carrier Appointment System) is required in the TFG, the TSP will be required to utilize the CAS system to request delivery appointments. TSP can access the TFG and the CAS on the TEAMS website https://eta-teams.transport.mil/teams/login. 2. Failure to review the TFG for installation policies for pickup and delivery requirements may result in non-payment of detention, demurrage and/or storage charges. 3. Failure to review the TFG for installation operating hours may result in late shipments.		
			The CAS system issues were discussed on the call so I will just agree that this makes it more difficult to hit the RDD's. We are typically Monday through Friday so we will not be impacted by weekend deliveries/pickups.....	5. All of this adds up to less RDD compliance. Installation expectations will need to be tempered in my opinion for LTL because of this.	Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.		
				6. The current transit times are generous but they may actually contribute to better velocity and cost control for the DOD. Base access, CAS, TFG management, installation expectations....are all tied to the current times and industry has adapted to these.	Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.		
#7	Mercer Transportation Co. Inc	Jack Luby Director-Military Traffic Services (MCET)	1) SDDC's desire to protect the public by reducing the time that SRC I, SRC II and AE shipments "linger in the public domain" should focus on the real problem. Reducing transit time requirements does nothing to improve the carriers ability to get the shipment delivered. SDDC's focus should be on working with it's customers to improve shipment scheduling and receiving hours.	1)The proposed change to transit times will make weekends and holidays normal work/transit days. 2)The actual impact of this proposed transit time change will be an increase in costs for detention and/or storage charges by carriers	Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.		
			2)The tone of this proposed change to the transit time guidelines is that carriers are unnecessarily prolonging the delivery of AA&E shipments. Nothing could be further from the truth.	.	Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.		
			3)This carrier has no issue with the proposed transit time change. However, please know it will do nothing to accomplish the goal of getting shipment out of the public domain any sooner.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.		

			4)This carrier is also interested in how SDDC plans to enforce the final sentence in the Notes to Figure 5.2 Transit Time Guide – “The consignee must accept and receipt for shipments of SRC I, SRC II and AE upon arrival, enduring appropriate safety and security measures are taken to reduce risk to the public domain and classified materials”.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.		
#8	Bennett Family of Companies	Derek E. Walcott Mgr. Government Regulations & Pricing	Item 5 (Heading 1 – Section A – Subsection 1 – Line 9) – BHAV requests further definition surrounding the statement “Transit times start the day after the shipment departs the installation.” <i>There appears to be ambiguity within that statement, particularly in regards to Safe Haven. Lack of clarity could lead to misinterpretation between carriers, installations and transportation officers.</i>		Transit times start the day after pickup and end on the day the shipment has been offered for delivery or delivered. Delivery does not include arrival at the destination secure holding prior to shipment being offered to the consignee or delivery point.		
			Item 5 (Heading 1 – Section B – Subsection 1 – Line 18) – BHAV requests further definition surrounding the statement “Transit times start the day after the shipment departs the installation.” <i>There appears to be ambiguity within that statement, particularly in regards to Safe Haven. Lack of clarity could lead to misinterpretation between carriers, installations and transportation officers.</i>		Transit times start the day after pickup and end on the day the shipment has been offered for delivery or delivered. Delivery does not include arrival at the destination secure holding prior to shipment being offered to the consignee or delivery point.		
			Item 5 (Heading 1 – Section B – Subsection 2 – Line 22) – BHAV feels that adding weekends and federal holidays into the transit time places additional and unreasonable burden on the carriers and drivers, chiefly, those involved in dromedary shipping. BHAV recommends that this provision be removed.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.		
			Item 5 (Heading 2 – Figure 5.2 – Line 51) – BHAV disagrees with the proposed transit time for DDP/DROM shipments. The proposed transit time makes it more difficult, if not impossible, to build cost-effective dromedary shipment practices. BHAV recommends that the current transit time for DDP/DROM shipments remain in place		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.		
			Item 5 (Heading 1 – Section B – Subsection 3 – Line 26-28) – BHAV requests further documented requirements and installation flow-down responsibility to ensure the requirement “consignee must accept and receipt for shipments of SRC I, II and AE upon arrival” be enforced in all situations.		This was removed from MFTURP because it is not a requirement for the carriers, but it is a requirement for the consignee, therefore it will be added to DTR 202 N.4.c. Installation enforcement is on the commander.		
#9	Corporate Account Executive – Government Services	Tony Rossi	We are emailing our response to this proposed rule change due to the inability to effectively access the Docketing System. After review of the proposed change to reduce the single driver LTL transit times, we are strongly objecting to this proposed change. Given the current economic environment and severe driver shortage due to the COVID 19 Pandemic as well as various regulations and base access issues, the ability of LTL carriers to reduce transit times is severely hampered. We believe that the effect of this reduction in transit times, will end up having a negative impact on the carriers supporting the DOD LTL business and will end up creating potential carrier performance issues. This would have a costly impact to the DOD as the ability to meet reduced transit times will force the LTL carriers to charge an elevated rate or require the DOD to use Expedited Rates. This issue alone could unfortunately force LTL carriers that cannot meet the reduced transit times into carrier performance actions by the DOD and thus limit the amount of capacity that they can provide to the military. This potential reduction in capacity to the JDDE would be a major issue in the event of a surge or deployment capacity need. This would force more usage of Brokers, forwarders and Third Party Logistics companies that do not have assets (Tractors and Trailers). In this scenario, they could possibly be brokering these shipments to asset based carriers that do not meet DOD requirements for their carriers. Please accept the above comments into the record for the proposed change to DOD Single Driver LTL Transit times.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.		
#10	Bourne Logistics Management	John Mallinak, Analyst/Amy M. Bourne	Thank you for giving us the opportunity to read and comment on the proposed update to MFTURP-1 Section B.I, Item 5: DOD Standard Transit Time Guide – Single and Dual Driver Shipments and Categorized AA&E Shipments.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations		
			The clarification concerning the expected daily number of miles to be driven is important and appreciated. We are of the opinion that the proposed update to MFTURP-1 Section B.I, Item 5 is an improvement.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations		
			After reading and discussing this proposed update, we would like to share our views concerning a broader issue it brings to light.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations		

			The broader issue is total transit time, which includes the time spent loading trucks on base. If trucks can be loaded in an amount of time that is less than the current average, the expectation of 500-600 miles per day is reasonable. However, with current loading times on most bases, deliveries of 500-600 miles will need an extra day. It is our opinion that the time spent loading at DOD facilities is a matter that must be addressed so the stated mileage expectations can be met. Our chief concern is that an on-time delivery always begins prior to the loading process. Since a driver can only be on duty 14 out of 24 hours, "the clock is ticking" as soon as he or she starts the truck and drives to a base, since trucks and drivers are not allowed to enter bases to go off duty. In addition to this, it may take a considerable amount of time to get on base, be loaded, get paperwork and leave. Currently, a truck driver can expect to be on site at most bases for three to four hours, which subtracts 200-250 miles from the distance they could have driven toward delivery. Since all new trucks are required by the DOT to be fitted with ELDs, driving 500-700 miles on the day of loading is not a possibility. At Bourne Logistics Management we understand readiness is a major concern for SDDC. This being the case, the whole loading process (getting on base, being loaded and leaving base) must be expedited, particularly for shipments that require drivers to meet strict standards of timeliness.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations	
#11		Donald Welchoff, Jr	The proposed changes to standard transit times would result in expedited transportation for all truckload and dromedary shipments requiring transportation protective service with two-driver teams — Dual Driver Protective Service (DDP) or Protective Security Service (PSS). We support the safety and readiness initiative by the SDDC but feel that there will need to be dramatic changes at DoD facilities to accomplish the objective. Many of the AA&E carriers are familiar with such type of expedited services in the commercial sector. Many carriers transport high value or sensitive freight that requires set transit times for the loading and unloading of such shipments to reduce risk of theft or to keep production flowing in the supply chain. Many of the commercial shippers operate 24/7 to maximize the turns in their warehouses or distribution. If such a model was adopted by the DoD the velocity would certainly increase with the current carrier capacity. However, CONUS DoD facilities cannot currently accept an expedited flow of shipments due to limited operating days and hours.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.	
			The current standard transit times provide a longer time window to accomplish delivery accounting for the limited receiving capabilities at DoD facilities. Weekends, holidays and non-working days are not counted since delivery cannot be accomplished on those days.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations	
			For a high volume shipper to hold back loading activity until a day when a truck can travel direct to the destination and arrive on a working day creates a bottleneck on Mondays and Tuesdays (and potentially Fridays, see below), requiring more trucks from carriers and higher staffing costs for loading crews on those days and little to no activity later in the workweek. Imposing such operating restrictions would prevent DoD shippers from spreading the workload efficiently, resulting in increased logistics costs. Facilities will force carriers to drop their freight upon arrival and ask for drivers to return at a later date if the location is closed or cannot unload the shipment because of staffing issues. Such an occurrence will tie up a carrier's asset/trailer with no compensation or forces a layover w/power for the company that does not get paid to the carrier		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations	
			Existing rule: (5 days). DoD shipper ships material on Tuesday. Carrier must deliver by the following Tuesday since weekends aren't counted. Shipper may preload shipments and carrier may place into secure hold at origin (or in-transit if available) so that the shipment will arrive Monday or Tuesday during duty hours.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations	
			Proposed rule: (3 days). DoD shipper ships on Tuesday and carrier team drivers must depart immediately in order to arrive by Friday. However, receiving facility is closed on Fridays. Drivers must wait with truck and shipment over 60 hours before shipment may be offloaded.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations	
			Specific comments on Additional Justification for Changes to MFTURP		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations	
			Example 1 and Example 2 (700 miles per day) We agree with the SDDC analysis that based on HOS regulations, a TPS carrier with dual driver team is able to travel a distance of 700 miles in a 24-hour period. The congestion at truck stops for fueling, personal needs make it challenging for a driver to accomplish all within a 2 hour period based on conditions.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations	
			Page 3, Para 2, Line 22 "Weekends and federal holidays will be counted as part of transit time when figure 5.2 is used". Proposed transit times could work if receiving facilities were open weekends and holidays; willing and able to accept freight upon arrival.		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations	
			Page 3, Para 3, Line 26 "The consignee must accept and receipt for shipments of SRC I, II and AE upon arrival" We agree that receiving cargo upon arrival would reduce risk and increase readiness if the shipment could be offloaded our accepted as delivered upon arrival. We would support and would work with SDDC to accomplish this measure.		This was removed from MFTURP changes because it is not a requirement for the carriers, but it is a requirement for the consignee, therefore it will be added to DTR 202 N.4.c. Installation enforcement is on the commander.	

			<p>Page 4, Figure 5.2, Line 51 TOTAL TRANSIT DAYS FOR SNS (DDP & PSS) SHIPMENTS Proposed transit times on drom eliminates the time necessary to consolidate freight to one conveyance, basically removing the dromedary transport option from DoD. This will cause more trucks on the road for the same amount number of shipments that would be transported by one drom train. This could cause potential increase of exposure for the DoD with the additional number of shipments being transported in a single conveyance. This change would provide expedited service for all LTL and dromedary shipments and likely increase DoD costs by forcing TSPs to significantly raise LTL and dromedary rates. It will also impact readiness with the additional LTL and dromedary shipments being shipped as truckload. As a reminder many small facilities that receive dromedary shipments because they lack a receiving dock or cannot accommodate a 53' trailer.</p>		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.	
#12	Boyle Transportation	Marc D. Boyle	<p>The proposed changes to standard transit times would result in expedited transportation for all truckload shipments requiring transportation protective service with two-driver teams — Dual Driver Protective Service (DDP) or Protective Security Service (PSS). We understand the intent is to increase velocity, speed turnaround times and increase readiness. In commercial operations, carriers provide expedited services for high-value items and shippers are able to coordinate loading and unloading of shipments. Many commercial distribution centers and manufacturing sites are open 16-24 hours a day, 7 days a week or make arrangements to meet trucks for offloading. However, CONUS DoD facilities cannot currently accept an expedited flow of shipments due to limited operating days and hours. Operating in an expedited manner in this environment would cause many more instances where carriers' drivers would arrive at facilities after receiving hours. Most DoD facilities require drivers with DDP or PSS shipments to remain with vehicles and shipments until receiving hours open or a scheduled appointment time. At best, these delays at destination would dramatically increase, incurring detention costs for DoD, waste drivers available hours that could have been used to transport other DoD shipments thereby reducing readiness as well as worsening working conditions for drivers — a labor pool that is in exceedingly short supply.</p> <p>We would recommend that DoD work with industry and DoD shippers on a more comprehensive plan for logistics flows to better understand the impact of changes in transit time. Just as we wouldn't send 747 charters every 30 seconds into a small airport with an unpaved runway, the impact of increased velocity needs to be understood upstream and downstream in the supply chain. For the collective Defense Transportation System we want to offer solutions and a robust set of options that provide flexibility, we don't want to overly restrict or limit the customer's options.</p> <p>The current standard transit times provide a longer time window to accomplish delivery accounting for the limited receiving capabilities at DoD facilities. Weekends, holidays and non-working days are not counted since delivery cannot be accomplished on those days. Working with the receiving facility's appointment schedule, the best course of action to reduce exposure is often to put a shipment in secure holding at origin (where drivers do not have to remain with the trailer) or in transit until a delivery can be scheduled expeditiously that avoids excessive wait time at destination.</p> <p>We take our shared responsibility for TPS shipments very seriously. To limit public exposure to this material, the choice is to have a shipment on a trailer await transport in a properly designed DoD secure holding area for up to 48 hours before over the road transport at little to no cost; or, to have two drivers parked with the shipment at destination for the same period of time in much less than ideal conditions for the shipment and for the drivers at a very high cost.</p> <p>For a high volume shipper to hold back loading activity until a day when a truck can travel direct to the destination and arrive on a working day creates a bottleneck on Mondays and Tuesdays (and potentially Fridays, see below), requiring more trucks from carriers and higher staffing costs for loading crews on those days and little to no activity later in the workweek. Imposing such operating restrictions would prevent DOD shippers from spreading the workload efficiently, resulting in increased logistics costs.</p> <p>Example (locations for illustrative purposes only) DDP shipment from NWS Earle, NJ to White Sands Missile Range, NM 2,079 miles Destination restrictions:</p> <ul style="list-style-type: none"> ● ASP is closed on Fridays ● Drivers must remain with vehicle and shipment ● No rest room in safe parking area <p>Source: Transportation Facilities Guide</p> <p>Existing rule: (5 days). DoD shipper ships material on Tuesday. Carrier must deliver by the following Tuesday since weekends aren't counted. Shipper may preload shipments and carrier may place into secure hold at origin (or in-transit if available) so that the shipment will arrive Monday or Tuesday during duty hours.</p> <p>Proposed rule: (3 days). DoD shipper ships on Tuesday and carrier team drivers must depart immediately in order to arrive by Friday. However, receiving facility is closed on Fridays. Drivers must wait with truck and shipment over 60 hours before shipment may be offloaded.</p> <p>To avoid arrival during non-duty hours, shippers would need to ship longer distance shipments —1,800-2,700 miles, requiring 3 days of travel time — on Mondays or Fridays, limiting their options and prohibiting them from leveling productions across workdays.</p> <p>We look forward to working with SDDC to reduce public exposure. One potential option would be to designate more regional in-transit secure holding areas where trailers may be spotted with this material to accommodate shipments that cannot be delivered directly due to restricted operating hours and only safe parking areas.</p> <p>Specific comments on Additional Justification for Changes to MFTURP Example 1 and Example 2 (700 miles per day) We concur with the SDDC analysis that based on HOS</p>		Based on feedback provided by stakeholders, transit time mileage will remain unchanged. Weekends and holidays will not change or count towards transit time calculations.	

			regulations, a TPS carrier with dual driver team is able to travel a distance of 700 miles in a 24-hour period. We would request a somewhat longer period than 2 hours at truck stops to accommodate fueling and driver's personal needs. Crowding has made these tasks longer and more difficult for drivers.				
			Page 3, Para 2, Line 22 "Weekends and federal holidays will be counted as part of transit time when figure 5.2 is used". As mentioned above, we believe that it will be problematic for DoD facilities to accept shipments on weekends and holidays.				
			Page 3, Para 3, Line 26 "The consignee must accept and receipt for shipments of SRC I, II and AE upon arrival" We concur that receiving cargo upon arrival would reduce risk and would work with SDDC to accomplish this measure. (Also referenced on page 4, lines 59-61)				
			· Does receipt include offloading or only allowing base access?				
			Page 3, Figure 5.1, Line 42 "Based on definition/title of this chart it would apply to non-DTTS loads such as Constant Surveillance or Signature & Tally. Both of these services can be performed by a single driver and do not pose the same risk as SDDC notes for sensitive items (page 2 – para 2)				
			· As such, what analysis/rationale has been applied to reduced LTL/Droms for the following:				
			o <=500 from 5 days to 2 (60% reduction)				
			o 501-100 from 5 days to 2 (60% reduction)				
			o 1001-1500 from 6 days to 4 (33% reduction)				
			o 1501-2000 from 7 days to 5 (29% reduction)				
			o 2001-2500 from 8 days to 6 (25% reduction)				
			o >2500 from 9 days to 6 (33% reduction)				
			· The suggested changes are not likely sustainable since a single driver can only drive a total of 11 hours consecutively and must take a mandatory break.				
			· This change would provide expedited service for all LTL shipments and likely increase DoD costs by forcing TSPs to significantly raise LTL rates.				
			· It may additionally force TSPs to use Dual Driver teams (reducing DoD capacity) to support these shipments				