

STANDARDIZED MFTURP-1 COMMENT MATRIX

The matrix below is used as a template for submitting comments to request changes to the Military Freight Traffic Unified Rules Publication-1 (MFTURP-1). The proposed language change for the regulation will appear in Column 7, and Column 8 will include the rationale and systems impact or resource implications of the proposed change. Except as noted below, an entry is required in each of the columns. **Do not adjust the column widths or fonts.** Submit proposed Comment Matrix via e-mail to the Surface Deployment and Distribution Command (SDDC) MFTURP-1 Administrator.

Column 1 - # COMMENT NUMBER

Numeric order of comments. Manually enter numbers from the first comment to the last comment.

Column 2 – SOURCE

OSD
Service
Joint Staff
COCOM
DLA
DOD Log AIT
AAFES
DeCA
GSA
TSPs
Other Agencies, as required.

Column 3 – TYPE

C – Critical (Contentious issue that will cause non-concurrence with publication)
M – Major (Incorrect material that may cause non-concurrence with publication)
S – Substantive (Factually incorrect material)
A – Administrative (grammar, punctuation, style, etc.)

Column 4 – PAGE

Page number of the current publication.

Column 5 – PARA

Paragraph number that pertains to the comment expressed. (i.e. 4a, 6g, etc.)

Column 6 – LINE

Line number on the designated page that pertains to the comment.

Column 7 – COMMENT Change From/ Change To

Provide proposed language change. See example below.

Column 8 – RATIONALE AND SYSTEMS IMPACT/RESOURCE IMPLICATIONS

Provide concise, objective explanation of the rationale for the comment. In addition, include any known advantages, disadvantages, any system impacts or resource implications of the proposed change, and applicable regulatory references.

Column 9 – DECISION (MFTURP-1 Administrator Use Only)

A - Accept
R – Reject (Rationale required for rejection.)
M - Accept with modification (Rationale required for modification.)

NOTE: This column is for TASKER use only. No rationale required for accepted items. Rationale for rejection is placed in the rationale comment box and highlighted for clarity. For modifications, the complete modified language will be placed (and annotated) as the bottom entry for that item in the “Comments” column and the rationale for the modification placed in the rationale comment box and highlighted for clarity.

1. Com #	2. Source	3. TYPE	4. PAGE	5. Para	6. LINE	7. COMMENT	8. RATIONALE & SYSTEMS IMPACT/RESOURCE IMPLICATIONS	9. DECISION (A/R/M)
1	SDDC DMS	C	24	Secti on A. Part III. F.	850	<p>Add New Paragraph F.</p> <p>Potential language stating : MFTURP Bankruptcy Policy</p> <p>In the event the TSP enters into proceedings relating to bankruptcy, whether voluntary or involuntary, the TSP agrees to furnish, by certified mail or email, written notification of the bankruptcy to the MSDDC at usarmy.scott.sddc.mbx.g3-domestic-freight-services-branch@army.mil or for domestic air email USTRANSCOM at: transcom.scott.tcj5j4.mbx.lc@mail.mil and the transportation officers responsible for each active bill of lading. This notification shall be furnished within five days of the initiation of the proceedings relating to bankruptcy filing. This notification shall include the date on which the bankruptcy petition was filed, the identity of the court in which the bankruptcy petition was filed, a point of contact for coordinating delivery of freight in the TSP's possession, and a listing of the bills of lading and transportation officers for all government bills of lading against which final payment has not been made. This obligation remains in effect until final payment of the last bill of lading at issue.</p>	MFTURP Bankruptcy Policy language addition.	M – On hold
2	SDDC DMS	C				Rail IMS Charges		M – On hold
3	SDDC DMS	C				Inclusion of SAM.gov requirement for FCRP	Language is being worked.	M – On hold
4	SDDC GFM	A	245	Appe ndix	9182	Service Code CCS	Removed from GFM, Not in MFTURP. Still valid? MFTURP has CGC	R – Code is not needed.

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				C		Description Caboose/Guard Car Furnished Mode Rail	Caboose/Guard Car Furnished.	
5	SDDC GFM	A	245	Appen dix C	9182	Service Code CGR Description Caboose/Guard Car Furnished Mode Rail	Removed from GFM, Not in MFTURP. Still valid? MFTURP has CGC Caboose/Guard Car Furnished.	R – Code is not needed.
6	SDDC GFM	A	245	Appen dix C	9182	Service Code CSP Description Caboose/Guard Car Furnished Mode Rail	Removed from GFM, Not in MFTURP. Still valid? MFTURP has CGC Caboose/Guard Car Furnished.	R – Code is not needed.
7	SDDC GFM	A	245	Appen dix C	9182	Service Code GSP Description Caboose/Guard Car Furnished Mode Rail	Removed from GFM, Not in MFTURP. Still valid? MFTURP has CGC Caboose/Guard Car Furnished.	R – Code is not needed.
8	SDDC GFM	A	245	Appen dix C	9182	Service Code FPT Description In-Transit Visibility Mode Motor	Service Code is in GFM. It is not in MFTURP. Should it be added to MFTURP? If so, where?	R – Code is not needed.
9	SDDC	A	245	Appen	9182	Service Code	Removed from GFM, Not in MFTURP.	R – Code is not

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	GFM			ndix C		RAM Description Portable Ramps at Destination Mode Rail	Still valid? MFTURP has PRD Portable Ramps at Destination	needed.
10	SDDC GFM	A	245	Appen dix C	9182	Service Code RMP Description Return Movement of Pallets Mode Towaway	Service Code is in GFM. It is not in MFTURP. Should it be added to MFTURP?	R – Code is not needed.
11	SDDC GFM	A	245	Appen dix C	9182	Service Code SUP Description Inspector Requested for Loading Mode Rail	Service Code is in GFM. It is not in MFTURP. Should it be added to MFTURP?	R – Code is not needed.
12	SDDC GFM	A	245	Appen dix C	9182	Service Code SUC Description Portable Ramps at Origin Mode Rail	Removed from GFM, Not in MFTURP. Still valid? MFTURP has PRO Portable Ramps at Destination	R – Code is not needed.
13	SDDC GFM	A	245	Appen dix C	9182	Air Codes TBD	GFM is working with TRANSCOM to determine need requirements for Air Service Codes. MFTURP changes are TBD based on the outcome.	M – On hold based on further discussions with TRANSCOM
14	SDDC GFM	A	245	Appen dix	9182	Add: RAIL ITV	Listed in GFM. Is code valid?	R – Code is not needed.

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				C		Rail In-Transit Visibility (RAIL ITV) Reporting		
15	TRANSCOM TCJ5/4	C	17	Section A.III. A.3	599-600	<p>Change from: Prior to submitting an invoice (e-bill) the TSP must have proof of delivery such as, but not limited to, a copy of the bill of lading</p> <p>Change to: Prior to submitting an invoice or linked e-bill, the TSP must have proof of delivery by obtaining, at a minimum, a copy of the bill of lading</p>	Change needed for proper management of both the tender and spot bid programs for all modes of transportation.	R - This statement does not work for rail carriers as rail carrier shipments are usually completed before they receive the BL. Could add information to the sentence that clearly indicated a government rep for delivery or a date/time stamp on BL.
16	TRANSCOM TCJ5/4	A	245	Appendix C	9182	Add the following entry: 535 Pickup Beyond Service Area Charge CONUS	Change needed for proper management of air tenders and air spot bids.	R – Entries for CONUS and OCONUS were combined in the Appendix.
17	TRANSCOM TCJ5/4	A	276	Appendix F	10106	Add the following entry: AD Airport-to-Door	Change needed for proper management of air tenders and air spot bids.	R - RD is the correct code for Airport to Door.
18	TRANSCOM TCJ5/4	A	3	Section F. Table of Contents	42	<p>Change from: PACKAGING AND MARKING REQUIREMENTS (HAZ, HMA, HMI)</p> <p>Change to: PACKAGING AND MARKING REQUIREMENTS (HAZ)</p>	Change needed for proper management of air tenders and air spot bids.	R – Per TRANSCOM TCJ4-LC, non-concur. The HMA and HMI charges should remain as they are referenced in

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								the paragraph (Section F, Item 492).
19	TRANSC OM TCJ5/4	C	12	Secti on F.I.It em 427.4	424- 429	<p>Change from:</p> <p>a. Airport-to-Airport Service (AA) - Origin city airport to destination city airport.</p> <p>b. Door-to-Door Service (DD) - Shipper's origin to consignee's receiving point.</p> <p>c. Airport-to-Door Service (RD) - Destination city airport to consignee's receiving point.</p> <p>d. Door-to-Airport (DR) - Shipper's origin to destination city airport.</p> <p>Change to:</p> <p>a. Airport-to-Airport Service (AA) - Origin city airport to destination city airport.</p> <p>b. Door-to-Door Service (DD) - Shipper's origin to consignee's receiving point.</p> <p>c. Airport-to-Door Service (RD) - Destination city airport to consignee's receiving point.</p> <p>d. Door-to-Airport (DA) - Shipper's origin to destination city airport.</p>	Change needed for proper management of air tenders and air spot bids.	R – Per TRANSCOM TCJ4-LC, RD is the correct code for Airport to Door; DR is Door to Airport.
20	TRANSC OM TCJ5/4	A	20	Secti on F.II. Item 492	744- 745	<p>Change from:</p> <p>ITEM 492 - PACKAGING AND MARKING REQUIREMENTS (HAZ, HMA, HMI)</p>	Change needed for proper management of air tenders and air spot bids.	R – Per TRANSCOM TCJ4-LC, non- concur. The HMA and

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						Change to: ITEM 492 - PACKAGING AND MARKING REQUIREMENTS (HAZ)		HMI charges should remain as they are referenced in the paragraph (Section F, Item 492).
21	TRANSC OM TCJ5/4	A	20	Secti on F.II. Item 492.5	763	Change from: TSP for a charge of HAZ (1) \$__per shipment. Change to: TSP for a charge of HAZ (1) \$__per rated pound.	Change needed for proper management of air tenders and air spot bids.	R – Per TRANSCOM TCJ4-LC, non- concur. TCJ4-LC non- concurrent with carrier's previous suggested change, that would drive this change.
22	TRANSC OM TCJ5/4	A	21	Secti on F.II. Item 492.6	764- 766	Change from: 6. Hazardous Material Charge (HAZ). For international shipments, the hazardous material shall be processed by the TSP for a charge of HAZ (2)\$_____per rated pound, subject to a minimum charge of HAZ (3)\$_____, whichever is greater. Change to: Recommend delete Para 6 from MFTURP	Change needed for proper management of air tenders and air spot bids.	R – Per TRANSCOM TCJ4-LC, non- concur. TCJ4-LC non- concurrent with carrier's previous suggested change, that would drive this change.
23	TRANSC OM TCJ5/4	A	21	Secti on F.II. Item 492.7	767- 769	Change from: 7. Hazardous Material Accessible (HMA). For international shipments, the hazardous material shall be processed by the TSP for a charge of HMA (1)\$ per rated pound, subject to a minimum charge of HMA (2)\$, whichever is greater.	Change needed for proper management of air tenders and air spot bids.	R – Per TRANSCOM TCJ4-LC, non- concur. TCJ4-LC non- concurrent with carrier's previous

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						Change to: Recommend delete Para 7 from MFTURP		suggested change, that would drive this change.
24	TRANSCOM TCJ5/4	A	21	Section F.II. Item 492.8	770- 772	Change from: Hazardous Material Inaccessible (HMI). For international shipments, the hazardous material shall be processed by the TSP for a charge of HMI (1)\$ ____ per rated pound, subject to a minimum charge of HMI (2)\$ ____, whichever is greater. Change to: Recommend delete Para 8 from MFTURP	Change needed for proper management of air tenders and air spot bids.	R – Per TRANSCOM TCJ4-LC, non- concur. TCJ4-LC non- concurrent with carrier's previous suggested change, that would drive this change.
25	TNF Transport LLC / FAR Logistics LLC	N/A	N/A	N/A	N/A	For your consideration, if there was an inclusion or rate qualifier in the voluntary submission of tenders of a "RAMPS " as an accessorial for the AH2, AH3 this would allow for the corresponding equipment type to be the selected TSP as many times the requirement is "piggy backed" upon the normal conveyance AH2 or AH3 tender with no cost allocation/ or forewarned knowledge to the TSP.		R - CRM not provided. Change is not needed. This request drives a GFM system change we currently do not have planned. This requirement needs to be appropriately developed in GFM before this can be included in an MFTURP revision.
26	TNF Transport LLC /	N/A	N/A	N/A	N/A	For your consideration, if there was an inclusion or rate qualifier in the voluntary submission of tenders of a		R – CRM not provided. non- concur with

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	FAR Logistics LLC					"hazmat" accessorial, this would allow for only those "APPROVED" with corresponding legal credentials to be the selected TSP.		change. The commodity code already has built in HAZMAT rates if required. There is no need for a HAZMAT accessorial based on the rate already being built into the code. A tender can be built with HAZMAT rates if the carrier would like to see more potential HAZMAT shipments
27	Berry Transport	N/A	N/A	N/A	N/A	The code for Low Boy's should be removed. There is no such thing as a low boy or double drop. It is either a Step Deck or RGN. AB (Low Boys) code is just confusing and then the TSP has to reach out to the shipper to see what kind of truck they really need		R – CRM not provided. Per the DMS Team, the Lowboy codes come from TRANSCOM Reference Data Management (TRDM) and Defense Transportation Electronic Business (DTEB) Committee. Per

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								the DTEB Committee, the Lowboy codes are a part of the DoD DTEB Convention publication used for the DFTS contract. At this time, the Lowboy codes will remain. SDDC will monitor the publication for future updates and possible removal of codes.
28	Berry Transport	N/A	N/A	N/A	N/A	Possible use and codes for sprinter vans.		R – CRM not provided. Per the DMS Team, the Sprinter Van codes come from TRANSCOM Reference Data Management (TRDM). TRDM stated van codes are already in the Transportation Equipment Type Data Table. The carrier should use those codes instead of a

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								specific brand “Sprinter” for the van selected.
29	Berry Transport	N/A	N/A	N/A	N/A	More clearly define “one and done” service failures. It would be nice to see the TO’s write something up as a service failure. Either put you in a 30 day non use out of that installation, or overlook you once, and then go back to using you.		R – CRM not provided. Comment noted; no MFTURP-1 change or update proposed. Per the DMS Team, carriers can submit appeals to service failures and non-use actions to the Carrier Performance Program for review. The team can remove service failures and non-use actions found to be unwarranted.
30	Berry Transport	N/A	N/A	N/A	N/A	If a TA is going to overlook you due to past performance, make sure that they are also taking into account how many loads you actually haul. I.E. we have 3 service failures within the last 90 days but have completed over 95% of the loads we did accept, they shouldn’t be allowed to overlook us. Operating at 95% or better is not a past or present performance issue.		R – CRM not provided. Comment noted; no MFTURP-1 change or update proposed. Per the DMS Team, carriers can submit appeals

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								to service failures and non-use actions to the Carrier Performance Program for review. The team can remove service failures and non-use actions found to be unwarranted.
31	Berry Transport	N/A	N/A	N/A	N/A	In order to use “Truck on site” to overlook someone, it must be an asset based carrier and they must be delivering to that installation with a BOL as proof. If not an asset based carrier, they are providing the same equipment as a broker. To take from one broker to give to another without that driver being on base, then it is an overlook.		R – CRM not provided. Comment noted; no MFTURP-1 change or updated proposed.
32	Berry Transport	N/A	N/A	N/A	N/A	Need to clarify that tarping is for weather or surveillance and if you request tarping you have to pay for it. Yuma (KDML) is under the impression that they don’t have to pay a tarp if they are wanting it for weather protection.		R – CRM not provided. Per the DMS Team, the TO should apply the TARP accessorial to the BL. If the TO does not, please bring concerns to the Cost Dispute Team.
33	Berry Transport	N/A	N/A	N/A	N/A	“Awarded” Needs clarification. Some installations are saying awarded is when it is awarded in the ATR. Some installations say it is when they call. Not		R – CRM not provided. Comment noted; no

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						all shipments are awarded in the ATR. Fort Carson loads never cross over to awarded. They sit in the current shipment until they automatically expire in the ATR/GFM system. The reason this needs clarification, is that some installations will call you to award a load but will not award it in the ATR until the shipment picks up. This is a problem if a driver shows up and the shipment is not ready or they cancel the shipment, they are saying since they didn't award it in the ATR they don't have to pay for a VFN. A lot of TO's are using this to bypass being held accountable for freight mistakes. This is not fair to the TSP because we still have to pay a VFN so we are losing money because they have found a loophole in the system. However, if they called and awarded the shipment and we didn't pick up, we would get a service failure. So they can not award it and give us a service failure but they aren't held accountable for VFN's and we are held accountable by the carrier.		MFTURP-1 change or update proposed. Per the DMS Team, carriers can supply the Cost Dispute Team examples with specific locations conducting these actions. The team will then engage and determine if a VFN charge is warranted.
34	Berry Transport	N/A	N/A	N/A	N/A	Mission requirements: If a TO/TA has certain mission requirements then in remarks it should say due to mission requirements, ASSET based carriers only. The reason for this is, if they overlook a broker and then turn around and give it to another broker..... they are providing the same service and probably the same truck as the other broker. They are using mission requirements to cherry pick what brokers they want to use, therefore making the ATR null and void.		R – CRM not provided. Comment noted; no MFTURP-1 change or update proposed.
35	Berry	N/A	N/A	N/A	N/A	Time limits for the ATR. There should		R – CRM not

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	Transport					be defining time limits for things put in the ATR. There is no reason to put a load in for 48hrs. The rule of thumb used to be that if it was to ship the same day or the following day, they are to enter it into the ATR for 1hr and then must call within that hour. If it is to time out, after normal business hours then it should wait until the next day. When we are accepting loads, they are calling after normal business hours and we are losing loads. If they recovering a load, putting it in for 30min would work, but putting loads in for 15min doesn't give anyone time to line up trucks. Putting them in for 4-72hrs is not proper time management. It leads to miscommunications. They put a load in to pickup the same day but have 4hrs on it. This just needs to be spelled out on what the actual time frames are and when they have to call to award them.		provided. Comment noted; no MFTURP-1 change or update proposed.
36	Berry Transport	N/A	N/A	N/A	N/A	Clarify, define or remove "BEST VALUE CARRIER".		R – CRM not provided. Per the DMS Team, there is currently a best value definition located in the MFTURP-1.
37	FedEx Services	C	75	Section A.VI. F.1.c,	2439 - 2440	Change from: Operate to reduce or eliminate the level of liability of the TSP under the original terms and conditions of the BL. Change to: Operate to reduce or eliminate the level of liability of the TSP under the original terms and conditions of the BL and/or	To coincide with commercial practices of all TSPs	R - Per TRANSCOM TCJ4-LC - non-concur; CBL outlines terms and conditions

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						the TSP's airway bill in accordance with the tender/agreements terms and conditions		
38	FedEx Services	C	75	Section A.VI. F.2.	2444 - 2446	<p>Change from: In no event may motor TSP, freight forwarders, rail TSP, or water TSP utilize multi-modal service in order to avoid application of the Carmack Amendment or the terms and conditions set forth on the BL, or to otherwise</p> <p>Change to: In no event may motor TSP, freight forwarders, rail TSP, or water TSP utilize multi-modal service in order to avoid application of the Carmack Amendment or the terms and conditions set forth on the BL and/or the TSPs airway bill</p>	To coincide with commercial practices of all TSPs	R - Per TRANSCOM TCJ4-LC - non-concur; CBL outlines terms and conditions
39	FedEx Services	C	77	Section A.VI. H.3.	2507 - 2508	<p>Change from: TSP will obtain a BL from the party requesting the return.</p> <p>Change to: TSP will obtain a BL from the party requesting the return. The party requesting the return may or may not provide the TSP with an additional BL or commercial airway bill</p> <p>or remove this item</p>	Those requesting a return or refusing a delivery are not known to provide an additional BL or commercial airway bill for the return trip; this adds undue burden on the TSP because such returns may be handled differently per Express TSP	R- Per SDDC - Not a rule to be approved.
40	FedEx Services	C	114	Section B.II. Item 49	4426	Add a #4 to allow fee HBB(4) to exist; this would enable the TSP to charge per person per hour regardless of shipment weight; this will most likely result in lower fees for the government	Charging per person per hour should result in lower fees for the government and would more accurately describe the work needed for handling freight at positions not immediately adjacent to vehicle; to better coincide with costs the TSP incurs; also to follow common commercial air freight practice	R - Per SDDC, do not agree with the addition. This request drives a GFM system change we currently do

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								not have planned. This requirement needs to be appropriately developed in GFM before this can be included in an MFTURP revision.
41	FedEx Services	C	146	Section B. IV. 119	5751	Add a #5 to apply to Express TSPs. For example – greater than 48” on its longest side; greater than 30” on its second-longest side; greater than 105” in length and girth; actual weight greater than 50 lbs. or 70 lbs. or 90 lbs. minimum weight (dependent upon service); non-standard packaging; or greater than 96” in length or 130” in length and girth	The MFTURP was written for LTL and TL TSPs, even though it is also being applied to Express TSPs. The dimension and weight measurements and packaging requirements listed are specific to LTL and TL TSPs. Different dimension and weight measurements and packaging requirements need listed for Express TSPs.	R - The MFTURP does not apply to the Small Package Express contract. The carrier would have to contact the contract office for potential issues.
42	TRANSCOM J4-PT	A	59	Section A. Appendix B. 5.	1916 - 1922	Change From: Rating Multiple Shipments. All shipments tendered to one TSP on one calendar day by one consignor consigned to the same consignee at the same delivery site shall be considered as one shipment for rating purposes. To receive the benefit of reduced charges applicable to multiple shipments, shipper shall cross-reference the bills of lading of individual shipments to a single bill of lading, or further identify all multiple shipments tendered to the same TSP on one calendar day which are consigned to the same consignee at the same delivery site.	Tweaked the verbiage for clarity and to remove any perceived instruction directly to the shipper, as the DTR is the appropriate document for directing shippers. Changed from shipper “shall” to shipper “may” to reiterate to TSPs that this is a way for shippers to benefit from (potential) reduced costs.	R- Per TRANSCOM TCJ4-LC – non-concur: GFM does not operate this way for air shipments. A shipment is a single CBL, not multiple CBLs over a single day.

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						Change To: Rating Multiple Shipments. All shipments tendered to one TSP on one calendar day by one Consignor to the same Consignee at the same delivery site shall be considered as one shipment for rating purposes. Shippers may cross-reference or further identify BLs of multiple individual shipments tendered to the same TSP on the same day that have the same Consignor, Consignee and delivery site to receive the benefit of reduced charges applicable to multiple shipments.		
43	American Trucking Associations	C	68	Section A. V.B.3 .k.-1.	2206 - 2208	<p>Change from: k. GB - DTTS failure: Exceeded 2 Hour Stop (SRC I, II, PSS) or 4 Hour Stop (SRC III, IV) (exclude exceptions for weather, or other force majeure conditions)</p> <p>Change to: k. GB - DTTS failure: Exceeded 2 Hour Stop (SRC I, II, PSS) or 4 Hour Stop (SRC III, IV) (exclude exceptions for weather, or other force majeure conditions, and paragraph 3 of Item 85)</p> <p>Change from: l. GC - DTTS failure: Exceeded 100 Hour Rule (military secure holding facilities)</p> <p>Change to: Remove Paragraph</p>	These are conforming changes that would be required if previous submitted comments are accepted.	R – Suggested change to Section B. II. Item 85.1.2., comment, was not approved. This change is not required.
44	American Trucking Associations	C	74	Section A. VI.C. 6.	2388	Add new paragraphs: (a) A suitable Secure Holding Installation is required to provide restroom access for drivers.	Truck drivers can be required to stay in a secure hold location for several hours (or longer). Having access to a restroom is a basic human need.	M – Requirements for secure holding

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						<p>(b) 'Driver' means any driver transporting DoD shipments to/from a Secure Holding Installation.</p> <p>(c) 'Restroom access' means a fixed or portable restroom located on the premises of a Secure Holding Installation that is made available for use by a driver.</p> <p>(d) To be compliant with these requirements, a Secure Holding Installation shall provide restroom access to a driver in an area where providing access:</p> <p>(i) would not create an obvious health or safety risk to a driver;</p> <p>(ii) would not create an obvious security risk to the Secure Holding Installation; and</p> <p>(iii) would not cause a driver to violate other rules in this publication.</p> <p>(e) If a driver or TSP is concerned that a Secure Holding Installation is not in compliance with these restroom requirements, it should be reported to [INSERT CONTACT INFORMATION]. SDDC will investigate all reported concerns and work with any facility that might need corrective action.</p>	<p>This section would require a secure holding installation to provide restroom access for truck drivers. Such restroom can be fixed or portable but should not (1) create an obvious risk to the driver, (2) create an obvious risk to the installation, or (3) cause a driver to violate other rules in MFTURP.</p> <p>It also creates a reporting option for drivers to notify SDDC of any facilities that might not be in compliance with the restroom requirements.</p> <p>The reporting requirement isn't intended to penalize facilities that might not provide restroom access, but rather identify those locations to see if accommodations can be made.</p>	<p>locations are not contained within the MFTURP. This proposed change impacts higher-level DoD policy (ex. DoD Policy, DoD Directive) and/or local level Installation Management / Security policy. This comment would not be included in the DTR or MFTURP. SDDC and TRANSCOM are working to determine the best way to elevate proposed language related to secure holding facility requirements.</p>
45	American Trucking Associations	C	104	Section B.II. Item 21.2	4027 - 4051	Change from: 2. Free Time will commence once the TSP has notified the consignor or consignee that the trailer is positioned for loading or unloading. A trailer is considered positioned for loading or unloading when placed in a location so it	The existing rules are confusing and subjective and limit the ability of a TSP to collect detention, especially if there is a dispute. This would change existing policy so that free time commences when the TSP checks in at the access control point (as defined) and TSP records	R – SDDC non-concurs with change. Transportation Offices at DOD installations have no method

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						<p>can be immediately accessed for loading or unloading at the consignor's/consignee's loading/unloading location and within their normal operating hours or acceptance hours as annotated on the BL. If the shipping/receiving facility requires pickup and/or delivery appointments, wait time spent due to early or late arrivals will not count towards free time. If a TSP is prepared to position its trailer for loading or unloading, but is prevented from doing so due solely to government caused delays at the consignor's/consignee's loading/unloading location, free time will commence at that time. However, free time will never commence unless, and until, the TSP has notified the consignor or consignee that its trailer is at the shipping/receiving facility but is unable to position its trailer for loading or unloading due to a government caused delay at the consignor's/consignee's loading/unloading location. All requests for additional detention payments based on government caused delays must be submitted to the shipper/consignor and consignee on the BL for approval and must include sufficient information to establish entitlement to these additional fees. TSPs and Shippers are required to keep separate record-keeping functions for detention purposes. In the event of a dispute between the TSP's and Shipper's records, the Shipper's records will prevail. Minimum data fields will include: date/time TSP arrived; date/time TSP available for load/discharge;</p>	<p>prevail in the event of a dispute.</p>	<p>of monitoring and recording when a truck arrives to the installation access control point. The Security forces of the various Military Services/DoD Agencies are not responsible for recording those arrival times. Therefore, the DoD have no means to verify when a truck ordered under a Bill of Lading arrives at the installation access control point.</p>

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						<p>date/time load/discharge complete; date/time TSP departed. This data must be annotated on the BL, or TSP document, by the government employee conducting onloading/offloading and must include the employee's name and contact information.</p> <p>Change to: 2. Free Time will commence once the TSP checks in at the consignor or consignee's access control point. If the shipping/receiving facility requires pickup and/or delivery appointments, wait time spent due to early or late arrivals will not count towards free time. All requests for additional detention payments based on government caused delays must be submitted to the shipper/consignor and consignee on the BL for approval and must include sufficient information to establish entitlement to these additional fees. TSPs and Shippers are required to keep separate record-keeping functions for detention purposes. In the event of a dispute between the TSP's and Shipper's records, the TSP's records will prevail if the TSP includes the date/time the TSP checked in at the access control point and the date/time the TSP was released.</p>		
46	American Trucking Associations	C	105	Section B. II. Item 21.6	4064 - 4067	<p>Change from: Detention time starts when a vehicle is delayed by the shipper, consignor, destination or consignee beyond the allowable free time and ends when the vehicle is released by the shipper, consignor or consignee to either by notifying the driver or the TSP</p>	<p>This is mostly a conforming change that would be required if previous submitted comment is accepted, or it might be entirely redundant. The intent is to clarify that detention begins when a vehicle is delayed beyond allowable free time and ends when the vehicle is released.</p>	<p>R – SDDC non-concurs with change. Transportation Offices at DOD installations have no method of monitoring</p>

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						<p>representative that the vehicle is ready for pickup.</p> <p>Change to: Detention time starts when a vehicle is delayed beyond the allowable free time and ends when the vehicle is released.</p>		<p>and recording when a truck arrives to the installation access control point. The Security forces of the various Military Services/DoD Agencies are not responsible for recording those arrival times. Therefore, the DoD have no means to verify when a truck ordered under a Bill of Lading arrives at the installation access control point.</p>
47	American Trucking Associations	C	105	Section B. II. Item 21.7	4068 - 4073	<p>Change from: Detention time only includes the time the vehicle is delayed during normal shipping and receiving hours. If the vehicle is delayed beyond the shipper's, consignee's or consignor's normal shipping or receiving hours, then the only delay time included in the detention time is the time occurring during normal shipping and receiving hours. Refer to Storage Item Section A, paragraph VI, I (pg. 76).</p>	<p>TSPs can be detained over the weekend and/or during holidays. They should be able to collect detention in those situations.</p>	<p>R - For issues that occur after posted duty hours, refer to the storage paragraph in the MFTURP. The storage paragraph has sufficient language to determine applicable</p>

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						Change to: Detention time includes the time the vehicle is delayed after normal shipping and receiving hours but only when the delay occurs into a Saturday, Sunday, or holiday. If the vehicle is delayed beyond the shipper's, consignee's or consignor's normal shipping or receiving hours, then the delay time included in the detention time is the time occurring beginning at 12:01 a.m. on a Saturday, Sunday, or holiday and ending at 8:00 a.m. on the next day which is not a Saturday, Sunday, or holiday.		charges.
48	American Trucking Associati ons	C	106	Secti on B. II. Item 23.2. b.-c.	4131 - 4133 ; 4134 - 4135	Change from: When any portion of the free time extends into a Saturday, Sunday, or holiday, the computation of free time will resume at 12:01 a.m. on the next day which is not a Saturday, Sunday, or holiday. Change to: When any portion of the free time extends into a Saturday, Sunday, or holiday, the computation of free time shall begin at 12:01 a.m. on a Saturday, Sunday, or holiday, and end at 8:00 a.m. on the next day which is not a Saturday, Sunday, or holiday. Change from: Free time shall not begin on a Saturday, Sunday, or holiday, but at 8:00 a.m. on the next day which is not a Saturday, Sunday, or holiday. Change to: Remove paragraph	TSPs can be detained over the weekend and/or during holidays. They should be able to collect detention in those situations.	R - For issues that occur after posted duty hours, refer to the storage paragraph in the MFTURP. The storage paragraph has sufficient language to determine applicable charges.

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49	American Trucking Associati ons	C	122- 123	Secti on B. II. Item 85.1. 2	477- 4784	<p>Change from:</p> <p>1. En route stops of up to two (2) hours are permitted for shipments with PSS or DDP when conducting stops in accordance with 29/49 CFR for operational reasons such as fueling, minor maintenance, or driver amenities. (Refer to 49 CFR part 395 [Hours of Service], 397.7 [Parking] and 29 CFR 1910.109[d][3][ii] [Operation of Transportation Vehicles]).</p> <p>2. For DDP shipments, the TSP is permitted en route stops of up to four (4) hours when conducting stops in accordance with 49 CFR for operational reasons such as fueling, minor maintenance, or driver amenities.</p> <p>Change to:</p> <p>1. En route stops of up to two (2) hours are permitted for shipments with PSS when conducting stops in accordance with 29/49 CFR for operational reasons such as fueling, minor maintenance, driver amenities, or if the destination facility is closed or unable to provide a delivery appointment. (Refer to 49 CFR part 395 [Hours of Service], 397.7 [Parking] and 29 CFR 1910.109[d][3][ii] [Operation of Transportation Vehicles]).</p> <p>2. For DDP shipments, the TSP is permitted en route stops of up to four (4) hours when conducting stops in accordance with 49 CFR for operational reasons such as fueling, minor maintenance, or driver amenities.</p>	<p>This exception would effectively only apply in situations where DoD causes the TSP to exceed the 2 hour limit. In lieu of the exception, it would allow DoD to direct a TSP to another destination, but would require TSP to be compensated. Add an exception if (1) the destination facility is closed or unable to provide a delivery appointment, (2) the destination facility is unable to provide a secure holding area, and (3) the TSP determines that moving the load would increase the risk of an accident. Add a new paragraph that states if DoD directs a TSP to proceed to a secure holding area that is not the original destination facility, such movement is considered Reconsignment or Diversion, and allow a TSP to charge accordingly.</p>	<p>R - SDDC non-concurs with change. The information of installation closing should be in the TFG. The carriers should be looking to the TFG before delivery.</p>

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						<p>3. For shipments in this section, a TSP shall not be penalized for exceeding the en route stop time limitations if the TSP is unable to deliver the shipment because the destination facility is closed or the destination facility is unable to provide a secure holding area or safe haven location for the TSP, and if the TSP determines that moving the load would increase the risk of an accident.</p> <p>(a) If the Department directs a TSP to proceed to/from a secure holding area or safe haven location that is not the original destination facility in lieu of the carrier exceeding the enroute stop time limitations in paragraph (3), the movement shall be considered Reconsignment or Diversion, allowing a TSP to charge applicable rates.</p>		
50	American Trucking Associations	C	123	Section B. II. Item 91.1	4799 - 4813	<p>Change from: Secure holding of Arms, Ammunition, and Explosives shall only apply to DoD installations/activities. These standards shall ensure the proper temporary parking of commercial TSP motor vehicles that are transporting Categorized AA&E or classified materials. Secure holding installations/activities may only be utilized for a maximum of 100 hours. In no event shall Secure Holding relieve the TSP of any liability relating to the safe transport of the shipment at issue. Furthermore, in no event shall this provision be interpreted to mean that DoD assumes any responsibility or liability for either the shipment or the equipment of the TSP. The secure</p>	Delays in this category are generally caused by DoD, not a TSP. Requiring a TSP to leave a secure hold when the destination facility is unable to receive the load reduces margins of safety and security.	M – SDDC The 100-hour rule is a DTR requirement; any changes to this language must be proposed to USTRANSCO M, staffed, and approved before related changes can be made to the MFTURP-1. DMS has passed the proposed language to

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						<p>holding installation/activity accorded is strictly temporary. TSP are advised that shipping documents shall be thoroughly examined at the entrance of a DoD installation/activity to prevent entry of any unauthorized shipments onto that installation/activity. Upon verification of those shipping documents at the entrance of the installation/activity, TSP vehicles shall be directed to proceed to a secure holding location within appropriate security area.</p> <p>Change to: Secure holding of Arms, Ammunition, and Explosives shall only apply to DoD installations/activities. These standards shall ensure the proper temporary parking of commercial TSP motor vehicles that are transporting Categorized AA&E or classified materials. In no event shall Secure Holding relieve the TSP of any liability relating to the safe transport of the shipment at issue. Furthermore, in no event shall this provision be interpreted to mean that DoD assumes any responsibility or liability for either the shipment or the equipment of the TSP. The secure holding installation/activity accorded is strictly temporary. TSP are advised that shipping documents shall be thoroughly examined at the entrance of a DoD installation/activity to prevent entry of any unauthorized shipments onto that installation/activity. Upon verification of those shipping documents at the entrance of the installation/activity, TSP vehicles shall be directed to proceed to a secure</p>		USTRANSCO M J4-PT for discussion and review.

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						holding location within appropriate security area.		
51	American Trucking Associations	C	258	Appendix E	9242	Add definition: ACCESS CONTROL POINT – Identified gap in an installation’s perimeter security for pedestrian and/or vehicular access. Often called an entry control point or simply “gate”. Includes commercial vehicle inspection points.	This change is only necessary if the changes to detention are accepted.	R - Previous detention changes were not approved making this change not applicable.
52	American Trucking Associations	C	N/A	N/A	N/A	Suggested Add: Section XXX. Complaints and Investigations. (a) Any Transportation Service Provider may submit a written complaint to the Surface Deployment and Distribution Command [insert mailing and email address] having jurisdiction in the Military Freight Traffic Unified Rules Publication if the TSP believes that a violation of the rules has occurred. (b) All complaints submitted pursuant to this section shall contain, at minimum: (1) The name of the complainant; (2) The complainant’s mailing address, phone number(s), and email address (if available); (3) A description of the complaint, including a reference to the rule(s) that were allegedly violated; and (4) Any other information that might assist SDDC in investigating the complaint. (c) Within 30 days upon receiving a complaint, the Director of Movement Support shall review the complaint, make an investigatory report, and render	The intent is to establish a framework for how SDDC will handle complaints, such as what information complainants are required to submit, timelines for reply, and an opportunity to appeal a decision.	R – SDDC non-concurs with change. Carriers have the Cost Dispute Team and Domestic Movement Support organizational email boxes for concerns.

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						<p>an initial finding, a copy of which shall be forwarded to the complainant and the Deputy Chief of Staff [or some other person/position].</p> <p>(d) Within 30 days upon receiving an initial finding, the complainant may submit a written appeal to the Deputy Chief of Staff [or some other person/position]. Such appeal must include:</p> <p>(1) The reason(s) the complainant believes the initial finding is wrong; and</p> <p>(2) Whether or not the complainant requests a meeting with the Deputy Chief of Staff [or some other person/position].</p> <p>(e) Within 30 days of receiving an appeal, the Deputy Chief of Staff [or some other person/position] shall:</p> <p>(1) Render a decision on the initial finding;</p> <p>(2) Forward a copy of the original complaint, the initial finding, the complainant's appeal, and the Deputy Chief of Staff's decision of the appeal to the Commanding General.</p> <p>(f) Within 30 days of receiving the information required by (e)(2), the Commanding General shall review the record and render a written decision.</p> <p>(1) Such decision shall be the final decision of SDDC.</p> <p>(g) If it is determined that a violation of the rules has occurred, SDDC shall impose a penalty in accordance with MFTURP and, if applicable, work with the offending party to take corrective action.</p>		
53	Landstar	A	9	Secti	253-	Change from:	This sentence 1) does not apply to this	R - Per

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				on A.II. A.2.d .	257	<p>Notify SDDC electronically (usarmy.scott.sddc.mbx.carrier-registrations@army.mil) or USTRANSCOM electronically for air shipments (transcom.scott.tcj5j4.mbx.lc@mail.mil) of any changes in ownership, affiliations, legal name or other changes affecting FCRP registration within 30 calendar days.</p> <p>Change to: Remove sentence</p>	<p>paragraph and 2) duplicates A.II.A.2.e (Pg.9, Lines 258-262) which states “Carriers must notify SDDC electronically (usarmy.scott.sddc.mbx.carrier-registrations@army.mil) or USTRANSCOM electronically for air shipments (transcom.scott.tcj5j4.mbx.lc@mail.mil) of any changes in ownership, affiliations, legal name or other changes affecting FCRP registration within 30 calendar days.</p>	TRANSCOM TCJ4-LC - non-concur; verbiage needs to remain in section F
54	Landstar	A	18	Secti on A. III.A. 4.	615	<p>Add: 5. Air TSPs are required to use the matching model for voluntary tenders in Syncada to ensure auditability through comparing services ordered to services rendered. a. Air tender shipments must us the standard 110 mapping. The table below outlines the minimum data elements which must be part of the invoice transactions. b. For the latest version of the Defense Transportation Electronic Business (DTEB) 858R IC, visit the DTEB website at https://www.unstranscom.mil/cmd/associated/dteb/ or download at https://www.ustranscom.mil/cmd/associated/dteb/dod-transportation.cfm.</p>	<p>This adds the additional air requirements that are not already included in Section A.III.A when Section F.III is removed.</p> <p>Please this addition was adjusted to apply only to voluntary tenders for the matching model as it cannot be used with spot bids or negotiated bids. Spot bids by their nature are “all-inclusive”. The same can be said of negotiated bids. The only exception would be accessories that are bid on an as needed basis.</p>	Per TRANSCOM TCJ4-LC - non-concur; Air TSPs do not control payment model
55	Landstar	A	19	Secti on A. III.B. 9.	664- 665	<p>Change from: While the Transportation Control Number (TCN) is not required at this time, but will be once the IC is updated, TSPs are required to provide it via the EDI 214A.</p>	<p>The wording is inconsistent. Something cannot be required and not required at the same time.</p> <p>TCNs have not been a requirement for shipments moving via tender (voluntary or negotiated) or spot bid. Per DTEB</p>	R - Per TRANSCOM TCJ4-LC - non-concur. Must not be removed from section F. Not

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						<p>Change to: While the Transportation Control Number (TCN) is not required at this time, but will be once the IC is updated, TSPs are encouraged to provide it via the EDI 214A.</p>	<p>Motor Carrier Shipment Status 214.A.004010, Version 9 Page 4, B1002 states this element must be either the bill of lading number or a TCN (Transportation Control Number) and per page 6, the L11 segment is an optional usage.</p> <p>In the FCRP Welcome Package, DOD requires EDI data feeds to track and trace domestic freight shipments. If the TSP chooses to use EDI messages, they must complete a Trading Partner Agreement (TPA). However, a TSP is not required to complete the TPA if they utilize the GFM to enter their acceptance of a shipment. There is nothing in the TPA agreement regarding providing TCNs. Additionally, the GFM's In-Transit Visibility Application only requires TSPs to submit shipment status data to the GTN – Departed Pick-up location, En Route to delivery location or Completed unloading at Delivery location.</p> <p>The GFM does not include TCNs within any application (ATR, CAVS, In-Transit Visibility, etc.). TSPs - in most cases - do not receive the BOL in advance. As a result, the TSP will not receive the BOL until the driver transmits it back to the TSP for payment. Assuming the TCNs are on the BOL, the carrier would need to manually enter multiple individual 17 digit alpha-numeric information, which is not reasonable or arguably even possible. Lastly, TSPs do not receive 204 EDI feeds from the government. These</p>	<p>applicable to ATP. ATP requirements are outlined in section F.</p>

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							<p>feeds would provide the TCNs and other information which would allow the TSP to auto-create freight bills in their system with the reference data required.</p> <p>Any change implemented would require time for the TSP to prioritize it against other project changes in order to implement.</p>	
56	Landstar	A	19	Section A. III.B. 10.d.	674-676	<p>Change from: d. Billed shipment weight. Provide this in the AT803 element with a “B” qualifier in the AT801. Also provide the unit of measure in the AT802 (L for pounds, K for Kilograms).</p> <p>Change to d. Billed shipment weight (if applicable). Provide this in the AT803 element with a “B” qualifier in the AT801. Also provide the unit of measure in the AT802 (L for pounds, K for Kilograms).</p>	Adds “(if applicable)” after Billed shipment weight. Per DTEB Motor Carrier Shipment Status 214.A.004010, Version 9, Pg. 81 “Carriers are encouraged to provide this data if available.” Additionally, only certain types of shipments are impacted by billed weight – for example air shipments, which are billed on the greater of the actual or dimensional weight, or rates where deficit rates apply (actual weight versus the lowest weight of the next break).	R - Per TRANSCOM TCJ4-LC - non-concur. Must not be removed from section F. Not applicable to ATP. ATP requirements are outlined in section F.
57	Landstar	C	19	Section A. III.B. 10.e.	676	Add: e. Party Who Signed Delivery Receipt. (Air Shipments) Provide the last name of the person who signed for delivery receipt using the N102 element with a “N5” qualifier in the N101.	Adds party who signs as record for Air in Section A.III.B when Section F.III is removed.	R - Per TRANSCOM TCJ4-LC - non-concur; must not be removed from section F. Not applicable to ATP. ATP requirements are outlined in section F.
58	Landstar	C	35	Section A. IV.C. Sections D,E,	1236 - 1239	<p>Change from: vi. Section G – Point-to-Point Air Rates. May be submitted with Section H (Territorial Air Rates). vii. Section H - Territorial Air Rates. May be submitted with Section G (Point</p>	TSPs may now file Section I so update this to include what sections can be filed with Section I and the Sections G & H which can be filed with Section I.	R - Per TRANSCOM TCJ4-LC - non-concur; In GFM, section I is for Small

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				G- I.1.b. vi- viii.		to Point Air Rates). Change to: vi. Section G – Point-to-Point Air Rates. May be submitted with Section H (Territorial Air Rates) and Section I (International Air Rates). vii. Section H - Territorial Air Rates. May be submitted with Section G (Point to Point Air Rates) and Section I (International Air Rates). viii. Section I – International Air Rates. May be submitted with Section G (Point- to-Point Air Rates) and Section H (Territorial Air Rates).		Packages
59	Landstar	C	60- 61	Secti on A. IV.C. Class 100.7	1934 - 1935	Update the Class 100 baseline levels * See "MCRP NO 100A (Effective 1989 06 15) SDDC Class Rate Publication NO. 100A" pdf**	This is the same Class 100 baseline levels used since at least June 15, 1989; at least 35 years.	M – SDDC is currently reviewing the table.
60	Landstar	A	73	Secti on A. VI.B. 1.	2349	Remove: Air TSPs see Section F	Remove as there is no reference to compatible or incompatible protective services in Section F. This is the only such table and air utilizes CIS so it is applicable.	R - Per TRANSCOM TCJ4-LC - non- concur with removing from section A. All protective services for commercial air is outlined in Section F
61	Landstar	C	130- 137	Secti on B. IV. Item 107 & Item 109	5069 , 5315		The DTR states that shipments can move without SEV, in certain instances. Specifically, “SEV is not required for shipments that move via closed box van with trailer tracking (DCS) when either origin or destination is at FPCON Normal, Alpha, or Bravo.”	R – Per TRANSCOM TCJ4-LC, non- concur. DTR Part II, Chapter 203 Paragraph B.10.:

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							<p>Per Item 107, DCS is used for all “closed-box van” shipments meeting certain requirements or when requested by the shipper. It provides DTTS “with periodic trailer position locations and further provides electronic emergency alert notifications in the event a trailer door is opened while en route, or when the trailer is untethered (disconnected) from the power unit.”</p> <p>However, DCS is not applicable to AO equipment. This leaves AO equipment in limbo as AO1-AO5 are considered “enclosed vans” and AO7 is considered an economy “van”. As such these equipment types also have doors that could be opened while en route. The other requirement for (and capability of) DCS is to report trailer untethering. As AO equipment types are a single (i.e. one) unit – not a tractor with a trailer – the equipment (i.e. cargo compartment/box) can’t be untethered.</p> <p>Shipments that used to move via AO equipment with an SEV accessorial are no longer being offered. This is because shippers may utilize AA or AV equipment and DCS as a cheaper option. Is there an option to rectify this issue (for AO equipment), regarding SEV and DCS, so shipments eligible to be transported via AO can have the same consideration as “closed box vans”? Could the SEV and/or DCS requirement be eliminated if an AO is provided?</p>	<p>Mode/Method. Determining the mode and method of shipment is generally the responsibility of the shipper. Mode refers to the general category of movement (e.g., air or surface) while method refers to the specific means of transportation, (e.g., motor, rail, air freight, parcel post). The DoD policy for selecting the mode of transportation is contained in Table 203-3. The mode and method of transportation selected will be that which will meet DoD requirements satisfactorily using the best value to the</p>

1. Com #	2. Source	3. TYPE	4. PAGE	5. Para	6. LINE	7. COMMENT	8. RATIONALE & SYSTEMS IMPACT/RESOURCE IMPLICATIONS	9. DECISION (A/R/M)
								Government from the origin to the final known destination in the CONUS or OCONUS.
62	Landstar	C	3	Secti on F. I.1.	55- 77	Add back: Commercial air service will not normally be used for transportation of shipments to be delivered within 500 surface miles from the shipping point.	<p>Add back this statement as the FCRP Welcome package states “Each mode of transportation intended to be registered (Motor, Rail, Ocean, Barge, Pipeline and Air) requires a separate SCAC. Additionally, the USTC FCRP Air Carrier Registration Letter states it is a letter “to guide prospective commercial air carriers through the requirements necessary to become an approved commercial air carrier.”</p> <p>Carrier Advisory CAR-06-05/24-064 dated May 24, 2006 states: “Motor, air, barge, ocean, pipeline and are air mode choices in the Freight Carrier Registration Program (FCRP). [. . .] SDDC grants separate approval for each mode of service offered; therefore, the TSP must provide a different SCAC for each mode it intends to provide when it registers with SDDC. Consequently, each tender must indicate the particular mode offered and that mode must match the SCAC registered with SDDC. The types of tenders that can be filed under the specific modes are as follow: [. . .] an air carrier may file tenders as K – air freight and L – air freight forwarder [. . .].”</p>	R - Per TRANSCOM TCJ4-LC – non-concur. Suggested change conflicts with mode substitution.
63	Landstar	C	3	Secti	79-	Remove:	All release value (cargo liability) should	R - Per

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				on F. I.2.	85	2. Domestic. If the shipment does not involve an international air transportation segment, the Montreal Convention of 1999 does not apply, and the TSP shall be liable for damage to or loss of cargo in an amount equal to \$1.00 per pound per piece or \$100 per piece, whichever is greater, but not to exceed the actual value of the cargo, except when the shipper declares a higher value for carriage liability on the shipment documentation and pays a commensurate surcharge, in which case the TSP's maximum liability shall be equal to the higher declared cargo value.	<p>remain in a single location within this publication. This location has already been established. As such this duplicates and conflicts with Section A.IV.C.2.o.iii & v (Pg. 32, line 1173 & 33, lines 1181-1187) which specifies the release value for air shipments.</p> <p>It also duplicates Section A.IV.C.2.o.i (Pg. 32, lines 1150-1157) which describes how released value on the tender, on the BOL or the release value in the tender sections of this publication will apply.</p>	TRANSCOM TCJ4-LC– non-concur. Keep all commercial air info in Section F.
64	Landstar	C	4	Secti on F. I.5.	108- 116	<p>Remove:</p> <p>5. International. If loss or damage to cargo occurs during a shipment involving an international air transportation segment, Chapter III of the Convention for the Unification of Certain Rules for International Carriage by Air (referred to as the Montreal Convention of 1999) relating to liability for the damage to, or loss of, cargo applies. The TSP's liability shall be limited to the lesser of the actual value of the cargo or the amount determined IAW the Montreal Convention of 1999, except when the shipper declares a higher value for carriage liability on the shipment documentation and pays a commensurate surcharge with the TSPs' filed tender rates, in which case the TSP's maximum liability shall be equal to the higher declared value.</p>	<p>All release value (cargo liability) should remain in a single location within this publication. This location has already been established. As such this duplicates and conflicts with Section A.IV.C.2.o.iii & v (Pg. 32, line 1173 & 33, lines 1181-1187) which specifies the release value for air shipments.</p> <p>It also duplicates Section A.IV.C.2.o.i (Pg. 32, lines 1150-1157) which describes how released value on the tender, on the BOL or the release value in the tender sections of this publication will apply.</p> <p>Additional information may need to be added to Section A.IV.C.2.o.v (Pg. 33, lines 1181-1187) to state Chapter III of the Convention for the Unification of Certain Rules for International Carriage by Air (referred to as the Montreal Convention of 1999) does not apply to domestic shipments but it does apply for</p>	R - Per TRANSCOM TCJ4-LC – non-concur. Keep all commercial air info in Section F.

1. Com #	2. Source	3. TYPE	4. PAGE	5. Para	6. LINE	7. COMMENT	8. RATIONALE & SYSTEMS IMPACT/RESOURCE IMPLICATIONS	9. DECISION (A/R/M)
							international shipments.	
65	Landstar	C	4	Secti on F. I.7.	123- 129	<p>Remove from Section F: 7. In accordance with the Fly America Act, each bill submitted by the TSP for payment of international air freight transportation charges involving, in whole or in part, the use of foreign flag TSP shall be supported by the TSP uploading to Syncada a copy of the air waybill showing the underlying TSPs utilized, and a certification, adequately explaining the non-availability of U.S. flag service, signed by the responsible official of the authorizing agency or the TSP having knowledge of the facts concerning such usage.</p> <p>Add new to Section A.III.A (Pg. 18, after line 615): 5. In accordance with the Fly America Act, air TSPs are required for international air freight transportation charges involving, in whole or in part, the use of a foreign flag TSP to submit a copy of the air waybill showing the underlying TSPs utilized, and a certification, adequately explaining the non-availability of U.S. flag service signed by the responsible official of the authorizing agency or the TSP having knowledge of the facts concerning such usage with each bill.</p>	As this applies to the Third-Party Payment System (TPPS) this should be removed from Section F and added to Section A.III.A (Pg. 18, after line 615), under a new paragraph.	R - Per TRANSCOM TCJ4-LC - non-concur. This requirement is particular to air only. Verbiage is straight out of the GSA Handbook.
66	Landstar	C	5	Secti on F. I.9.	139- 145	Remove: Shipment Tracking. The TSP shall ensure access to shipment tracking is provided for all shipments from the date and time of pickup to the date and time of delivery. Tracking shall be available 24-hours a day, seven days a week via	<p>Remove this paragraph as 1) it conflicts with the DTR on Pg. II-202-7 for Tracing and Tracking.</p> <p>It also contradicts any other mode which only provides automatic tracking for specific protective shipments (Motor</p>	R - Per TRANSCOM TCJ4-LC - non-concur. Do not see any correlation between 202-7

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						an online tracking tool. In the event the online tool is unavailable, the TSP shall ensure there is a means to provide manual tracking via email or a toll-free telephone service. The TSP shall provide real-time status updates via an email or text capability or via the TSP's commercial website.	TPS shipments – DTTS, Rail – MTX and Ocean – continuous monitoring with propeller and propulsor shipments).	and what this says. This requirement needs to stay the same until all carriers can consistently fulfill supplying EDI 214 to the government.
67	Landstar	A	7	Section F. I. Item 409.1	221-223	<p>Change from: The key to exporting DoD property is to properly document the shipment so it is clearly identified as DoD property and not commercial or private sector owned.</p> <p>Change to: The key to exporting DoD property is for the shipper to properly document the shipment so it is clearly identified as DoD property and not commercial or private sector owned.</p>	Add “for the shipper” as it is not a TSP responsibility to clearly identify DOD property.	R – Per SDDC, the MFTURP does not direct shippers.
68	Landstar	C	10	Section F. I. Item 421.2	364-371	<p>Change from: 2. If transportation for such shipments shall be provided on pallets (width 88 inches, length 125 inches), the TSP will not assess a rental charge for the use of the pallets. Charges: (stated in whole percent's only). For domestic shipments of oversized or non-stackable freight, as described in paragraph 1a-1d above, the TSP will be entitled to a flat surcharge of 520 (1)____% for each oversized or non-stackable piece. For international shipments of oversized or non-stackable freight, as described in paragraph 1a-1d above, the TSP will be entitled to a flat surcharge of 520 (2)____% for each oversized or non-stackable piece.</p>	<p>Removes the application of the charge as voluntary tenders are not an acceptable way to move over-dimensional freight per the Section A.III.C.1.c.v (Pg. 20, Lines 716-717) or Section A.III.C.5.a (Pg. 21, Lines 755-758).</p> <p>Match how Section B, Item 119 & 121 remove the 520 charges.</p>	R - Per TRANSCOM TCJ4-LC - non-concur. A.III.C. refers to Alternative Gov't Bidding Processes (negotiations), not voluntary tenders on file. Disagree w/comment, voluntary tenders are not a means to move over-

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						Change to: 2. If transportation for such shipments shall be provided on pallets (width 88 inches, length 125 inches), the TSP will not assess a rental charge for the use of the pallets.		dim'd cargo
69	Landstar	C	13	Secti on F. I. Item 442.1	478- 480	Change from: For domestic, shipments, each escort / courier shall be subject to a charge of ECR (1) \$ _____. For international shipments, each escort /courier shall be subject to a charge of ECR (2) \$ _____. Not used for TPS shipments moving under CIS. Change to: For domestic, shipments, each escort / courier shall be subject to a charge of ECR (1) \$ _____ per person. For international shipments, each escort /courier shall be subject to a charge of ECR (2) \$ _____ per person. Not used for TPS shipments moving under CIS.	Add per person back to the rule. 1) It clarifies how the accessorial applies and 2) follows the format used established in the other sections and specifically in Section A.IV.C.Accessorial Rate Section F.1.a.	R - Per TRANSCOM TCJ4-LC – non-concur. Current verbiage is in line with GFM.
70	Landstar	C	14	Secti on F. I. Item 448.1 -3	502- 508	Change from: 1. For domestic shipments, when delivery cannot be accomplished on the date of the first delivery attempt, the TSP is entitled to a redelivery charge of RCL (4) \$ _____ per pound, subject to a minimum charge of RCL (5) \$ _____. 2. For international shipments, when delivery cannot be accomplished on the date of the first delivery attempt, the TSP is entitled to a redelivery charge of RCL (6) \$ _____ per pound, subject to a minimum charge of RCL (7) \$ _____. 3. See Item 63 for additional Redelivery information	This update does not explain how this accessorial works in conjunction with Item 63. Are TSP still allowed to file RCL(1), RCL(2) and RCL(3)? If so how does RCL(1), RCL(2) and RCL(3) work or not work with RCL(4), RCL(5), RCL(6) and RCL(7). There is very little difference between RCL(1) and RCL(4)/RCL(5) (per hundredweight vs per pound) and RCL(2) and RCL(6)/RCL(7) (no difference). Overall, this rule removes significant	R - Per TRANSCOM TCJ4-LC - non-concur. However, concur item 424 should be modified to remove link to section B, Item 63.

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						<p>Change to:</p> <p>1. TSPs may select to establish charges as shown in Section B, Item 63 for RCL(1), RCL(2) and RCL(3).</p> <p>2. For domestic shipments, when delivery cannot be accomplished on the date of the first delivery attempt, the TSP is entitled to a redelivery charge of RCL (4) \$ ____ per pound, subject to a minimum charge of RCL (5) \$ ____ per shipment. If RCL(4) and RCL (5) are selected, RCL(1), RCL(2) and RCL(3) will not be applicable.</p> <p>3. For international shipments, when delivery cannot be accomplished on the date of the first delivery attempt, the TSP is entitled to a redelivery charge of RCL (6) \$ ____ per pound, subject to a minimum charge of RCL (7) \$ ____ per shipment. If RCL(6) and RCL (7) are selected, RCL(1), RCL(2) and RCL(3) will not be applicable.</p> <p>Or</p> <p>Change to:</p> <p>1. When final delivery of a DoD shipment cannot be accomplished due to circumstances beyond the control of, and through no fault of the TSP, the TSP will contact consignee for additional guidance within 24 hours of original delivery attempt.</p> <p>2. A shipment shall not be considered late delivery if it involves circumstances that require a redelivery. If redelivery is not accomplished, or if forwarding instructions are not furnished by the</p>	<p>information for the TSP on how this rule actually works and how to use when filling a tender. Based on the change it's very difficult to tell the intent of the update. As such an attempt was made to piece together Item 63, the prior rule under Item 437 and the new rule under Item 448.</p> <p>If the second change option is selected then an update would need to be made to Section F, Item 424 to remove reference to Section B, Item 63.</p>	

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						<p>shipper/consignee to the TSP within 24-hours of TSP's notification of the original delivery attempt, the shipment may be subject to Storage charges.</p> <p>3. The charge for redelivery shall either be RCL(1) \$_____ per hundred pounds, subject to a minimum charge of RCL(2) \$_____ per shipment, and a maximum charge of RCL(3) \$_____ per shipment. In lieu thereof the carrier may establish the following:</p> <p>4. For domestic shipments, RCL (4) \$_____ per pound, subject to a minimum charge of RCL (5) \$_____ per shipment. If RCL(4) and RCL (5) are selected, RCL(1), RCL(2) and RCL(3) will not be applicable.</p> <p>5. For international shipments, RCL (6) \$_____ per pound, subject to a minimum charge of RCL (7) \$_____ per shipment. If RCL(6) and RCL (7) are selected, RCL(1), RCL(2) and RCL(3) will not be applicable.</p> <p>5. Redelivery charges shall not apply to any shipment if a consignee elects on its own to pick up a shipment at TSP terminal.</p>		
71	Landstar	C	18	Section F. I. Item 475.1 -2	647-665	<p>ITEM 475 – RETURN CARGO CHARGE (RCC) UNDELIVERABLE SHIPMENTS/ REFUSED BY CONSIGNEE</p> <p>1. If a shipment is undeliverable, the TSP shall then contact the shipper for disposition or return instructions. If the TSP is unable to obtain disposition or return instructions from the shipper, the TSP shall return the cargo to the sender/shipper. The cost of any return or redirected deliveries requested by the</p>	RCC is a Section A rule it should not be located in Section A and Section F. It is very confusing how this rule applies and seems to conflict with Section A.VI.H (Pg. 76-77). TSPs are entitled to a fee which covers a change in name of the consignee, change in place of delivery at original destination point, change in original destination or change in route or other instructions that require a change in billing or additional movement of the shipment. This is in addition to the	R – Per TRANSCOM TCJ4-LC – non-concur with removing as RCC 1 and RCC 2 already exist in Item 475.

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						<p>shipper will be the responsibility of the shipper. The TSP shall use a linked eBill and identify the shipment as a returned shipment in the TPPS notes block. If a consignee refuses to accept a delivery, the TSP shall annotate refusal on the order (U.S. Government issued CBLs) with date, time, and name of person who refused and contact the shipper for disposition instructions. Delivery shall be considered accomplished on the date of the first refusal, if the TSP has documentation to show the consignee refused the shipment.</p> <p>2. For domestic and international air shipments, when a shipper or consignee refuses, rejects, or requests a shipment be returned to origin, the TSP may charge the service type and rate applicable to the lane of the returned shipment or less if a lower return service is more cost effective and meets TSP service capability. TSP will obtain a U.S. Government issued CBL from the party requesting return. Returning a shipment to the point of origin will not be interpreted as a continuous movement.</p>	<p>applicable rate to and from the reconsignment point. Also please reference the AFTRP No. 5 as TSPs were entitled to a fee per hundred pounds subject to minimum charge per shipment in addition to the applicable rate to and from the reconsignment point.</p>	
72	Landstar	A	19	Section F. I. Item 481.4	718-718	<p>Change from: In Section F(1) of the DoD Standard Tender of Freight Services, TSP will enter 675(1) or 675(3).</p> <p>Change to: In Section F(2) of the DoD Standard Tender of Freight Services, TSP will enter 675(1) or 675(3).</p>	<p>TSPs have not been able to enter 675(1) in Section F(1) since SDDC moved the accessorial from this section to Section F(2) in approximately 2013.</p>	<p>R – Per TRANSCOM TCJ4-LC – non-concur. In GFM Section F(2) does not contain 675 (1) and 675 (3) is not a part of Item 481.</p>

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73	Landstar	C	22- 23	Secti on F. III. Item 497 & Item 499	817- 920	Remove	Remove. This section duplicates and/or conflicts with Section A.III.A & B (Pg. 17-20, Lines 588-690).	R- Per TRANSCOM TCJ4-LC – non-concur. Air and motor have different requirements.
74	SDDC SRB	A	245	Appe ndix C	9182	Separate accessorials by mode	Ensures appropriate application of correct accessorials	R - Per TRANSCOM TCJ4-LC - non- concur; Do not see the need to break out definitions of codes.
75	SDDC DMS	A	116	Secti on B. II. Item 63.1	4516	Change from: When final delivery of a DoD shipment cannot be accomplished due to circumstances beyond the control of, and through no fault of the TSP, the TSP will contact consignee for additional guidance within 24 hours of original delivery attempt. Change to: When final delivery of a DoD shipment cannot be accomplished due to circumstances beyond the control of, and through no fault of the TSP, the TSP will contact consignee/Issuing Officer on the BOL for additional guidance within 24 hours of original delivery attempt.	The cargo is most likely going into storage because of the lack of contact with the consignee.	R- SDDC has different suggested language in response to FedEx change.

