

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 GFM	A	245	Appendix 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
2	American Trucking Associations	C	74	Section A. VI.C. 6.	2388	<p>Add new paragraphs:</p> <p>(a) A suitable Secure Holding Installation is required to provide restroom access for drivers.</p> <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>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.</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>M – Requirements for secure holding 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 submitted the comment to OSD I&S for consideration for inclusion in DoDD 5100.76. If I&S decided to implement</p>

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								this in 5100.76, then the Services would have to assess their ability to support. SDDC suggests the Carrier submit this comment for discussion at the NDTA Surface Committee meetings where OSD I&S POCs are present.
3	American Trucking Associations	C	123	Section B. II. Item 91.1	4799 - 4813	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 holding installation/activity accorded is strictly temporary. TSP are advised that	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 – Per SDDC, the 100-hour rule is a DTR requirement; any changes to this language must be proposed to USTRANSCOM, staffed, and approved before related changes can be made to the MFTURP-1. DMS has submitted the comment to USTRANSCOM J5/4-PT for discussion and

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						<p>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 holding location within appropriate security area.</p>		<p>review. TRANSCOM received feedback from their Service POCs. The Services all non-concurred with eliminating the 100-hour rule as it could potentially affect an installation's mission and readiness. TRANSCOM would need detailed data and supported rationale for the proposed change before further discussing with the Services. The Carrier also has the option of submitting the change directly to TRANSCOM. The information for submitting a change to the DTR is located</p>

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								on the TRANSCOM website. SDDC also suggests the Carrier submit this comment for discussion at the NDTA Surface Committee meetings.
4	American Trucking Associati ons	C	65	Secti on A. V. C.3.	2742 - 2752	Change from: Letter of Non-Use. Non-use or disqualification action may be taken for specific Incidents of unsatisfactory service or failure to perform, or a record or trend of unsatisfactory service or failure to perform IAW the terms of negotiated agreements, tariffs, tenders of service, or BLs, service agreements, governing SDDC/USTRANSCOM rules publications, or other similar arrangements. With the use of CPM/CPM Web Services, non-use action can be from specified BLOCs or SPLCs and can be narrowed down to non-use for shipments requiring specified Accessorial Services. A Letter of Non-Use will advise TSPs of the period of non-use, the reinstatement date, and of appeal procedures. A shipper may place a TSP in local non- use for up to 90 days for shipments originating from their activity AOR followed by a 90-day probationary period. While under probation, any additional service failures can result in	The decision to issue a letter of non-use can have a major impact on TSPs, and the appeals process does not include a stay on the letter of non-use if an appeal is filed. Decisions like this should only be made by the TO or his/her designee, and any designation should be provided in writing.	R – Per SDDC, with the current role permissions in GFM, all TOs and Transportation Assistants (TA) use the ITO role. The ITO role is used for transportation type duties. Since all TOs and TAs use the ITO role, SDDC cannot enforce the suggested language change. SDDC recommends the “disqualificatio n” verbiage be removed from

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						<p>additional non-use action.</p> <p>Change to: Letter of Non-Use. Non-use or disqualification action may be taken for specific Incidents of unsatisfactory service or failure to perform, or a record or trend of unsatisfactory service or failure to perform IAW the terms of negotiated agreements, tariffs, tenders of service, or BLs, service agreements, governing SDDC/USTRANSCOM rules publications, or other similar arrangements. A letter of non-use or disqualification action may only be taken by a TO or his/her designee, and any designation of authority must be provided by the TO in writing. With the use of CPM/CPM Web Services, non-use action can be from specified BLOCs or SPLCs and can be narrowed down to non-use for shipments requiring specified Accessorial Services. A Letter of Non-Use will advise TSPs of the period of non-use, the reinstatement date, and of appeal procedures. A shipper may place a TSP in local non-use for up to 90 days for shipments originating from their activity AOR followed by a 90-day probationary period. While under probation, any additional service failures can result in additional non-use action.</p>		<p>the suggested language as that action is not related to the TO role. Disqualification is done at the SDDC level, whereas TOs can implement temporary non-use action from their GBLOC.</p>
5	Landstar	C	60-61	Section A. IV.C. Class 100.7	1934 - 1935	<p>Update the Class 100 baseline levels</p> <p>* See "MCRP NO 100A (Effective 1989 06 15) SDDC Class Rate Publication NO. 100A" pdf**</p>	<p>This is the same Class 100 baseline levels used since at least June 15, 1989; at least 35 years.</p>	<p>M – Per SDDC, the Class 100 baseline levels are currently being reviewed. Once the new</p>

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								GFM contract is awarded, the new tables will be developed.
6	Landstar	C	67	Section A. VI. B.1. Table	2824	Change from: CIS - Compatible with 675 Change to: CIS - Incompatible with 675	Reverts table back to the current Unified Pub (eff 2022 09 12). The only way CIS and 675 would be compatible is if the TSP is being paid for both charges. This does not make sense as PSS includes the services of DDP or DDP includes the services of CIS, CIS includes the services of 675. This is per Section B, IV, Item 101, 7 "Signature and Tally Record Service (675) Item 69, in this section, shall be maintained." As such CIS is not compatible with 675.	R - Per DTR Ch. 205, Para O.6. states "DD Form 1907 (675 Service) is required for CIS, DDP, and PSS."
7	Landstar	A	68	Section A. VI. E.1.c.	2896 - 2901	Change from: For all FAK shipments containing crated HHG or personal effects commodity code 100251, as described in Appendix D, TSP liability for lost and/or damaged cargo is \$7,500 per shipment, or \$6.00 times the net weight of the household goods shipment or, the gross weight of the unaccompanied baggage shipment, not to exceed \$75,000, whichever is greater. Under the new FRV program, the TSP shall be liable for the full replacement value of HHG and personal effects transported as FAK. Change to: For all FAK shipments containing crated HHG or personal effects, as described in Section A Item 41 and Item 45, and commodity code 100251, TSP liability for lost and/or damaged cargo is \$7,500 per shipment, or \$6.00 times the net weight of the household goods shipment	Replace Appendix D as 100251 is not described in this appendix nor anywhere else in the publication. Additionally, this section should include 999912-01 and 999913-01 as both include crated HHG and personal effects and was include in the MFTRP-1C.	R – Per TRANSCOM, Section B. Item 39,41,43 and 45 list that the FAK codes do not include HHG. Section A, Paragraph E.1.c. also specifies that commodity code 100251 is used for crated HHG or personal effects.

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						or, the gross weight of the unaccompanied baggage shipment, not to exceed \$75,000, whichever is greater. Under the new FRV program, the TSP shall be liable for the full replacement value of HHG and personal effects transported as FAK.		
8	Landstar	C	70-71 & 106	Section A. VI. H. & Section B. II. Item 67	2965 - 2995 & 4383 - 4387	Questions about RLS and the property perimeter	<p>This section changes exceeding 25 miles to outside the property perimeter and removes “Shipments not exceeding 25 miles are entitled to Relocation (RLS) Item 67.”</p> <p>What happens when the truck is asked to return to origin and 1) the truck has not left the property perimeter and the mileage exceeds 25 miles or 2) the truck has not left the property perimeter and the mileage does not exceed 25 miles?</p> <p>For either instance it’s no longer clear the TSP should apply RLS and in the second instance RLS would not apply as it only states within 25 miles of the original consignee/destination – it does not state shipper/origin.</p>	R – Per SDDC, Paragraph H.3. provides details for using RCC (2). This is the applicable change for returning the shipment to origin.
9	Landstar	C	72	Section A. VI. I.2.a-c.	3067 - 3075	<p>Change from:</p> <p>a. Shipments weighing less than 10,000 pounds shall be subject to Storage charges of SRG (1) \$_____ per 24 hours, prorated by 1-hour increments, or fraction thereof, per shipment.</p> <p>b. Shipments weighing 10,000 pounds or more shall be subject to Storage charges of SRG (2) \$_____ per 24 hours, prorated by 1-hour increments, or fraction thereof, per shipment.</p>	<p>Update removed some prorating language and changed unit of measure from per day to per 24 hours. However still breaking the rate down the per 24 hours charge to pay on an hourly basis.</p> <p>As previously noted: 1 - Under Section A.IV.C. Accessorial Rate Section F.1.a. (Pg. 48) accessorials “must be in accordance with the definition contained in the rules publication.” Storage is defined in the rule as a per 24 hours charge. As such</p>	R – Per SDDC, agree with removing the previous rounding up language and adding back the fraction thereof verbiage as discussed during the first review period.

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						<p>c. Shipments stored in the carrier's possession after free time has expired shall be subject to a charge of SRG (3) \$__ per 24 hours, prorated by 1-hour increments, or fraction thereof, per shipment.</p> <p>Change to:</p> <p>a. Shipments weighing less than 10,000 pounds shall be subject to Storage charges of SRG (1) \$_____ per 24 hours, or fraction thereof, per shipment.</p> <p>b. Shipments weighing 10,000 pounds or more shall be subject to Storage charges of SRG (2) \$_____ per 24 hours, prorated by 1-hour increments, or fraction thereof, per shipment.</p> <p>c. Shipments stored in the carrier's possession after free time has expired shall be subject to a charge of SRG (3) \$__ per 24 hours, or fraction thereof, per shipment.</p>	<p>the unit of measure “fraction thereof” refers to is per 24 hours.</p> <p>2 – Accessorials are usually expressed in a flat rate, a per mile charge, a per hundredweight charge, or a per hour charge. Some services may require a minimum charge and certain accessorials may have a maximum charge in addition to a minimum change. In no case is an accessorial expressed as unit of measure broken down into a further unit of measure. If storage was intended as an hourly charge the unit of measure would have been described as per hour, or fraction thereof.</p> <p>3 - “Fraction thereof” is used in other locations in the MFTRUP-1 for other units of measure: For each 100 miles in paragraph 3 on Pg. 54; For each 24-hour day in paragraph 6.a to c on Pg. 97; For each 24 hour period in paragraph 1.c of Item 129 on Pg.133; and For each \$100 in Item 436 on Pg. 204.</p> <p>4 – The industry standard for storage is typically per day or per 24-hour day with fraction thereof. Some express storage as for each 100 pounds or fraction thereof per 24 hour/day or faction thereof. If expressed this way, there is a minimum and a maximum change. There is no “prorating”. Storage is paid on the unit of measure established. Based on the DOD rules storage is a per 24-hour accessorial subject to a minimum charge</p>	
10	Landstar	C	101-102	Secti on B.	4188 -	Change from: 1. FAK 999912, Sub 01, consists of	The MFTRP-1C spelled out 999912 and 999912-01 in full. When moved to the	R – SDDC confirmed with

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				II. Item 41.1- 2	4192	<p>those commodities which a TSP offers to transport at one inclusive rate or charge, regardless of their classification rating in the NMFC or their differing transportation characteristics.</p> <p>2. Must comply with paragraphs 2-6 outlined in Item 39 above, except for crated household goods, which are excluded under Item 39.</p> <p>Change to:</p> <p>1. FAK 999912, Sub 01, consists of those commodities which a TSP offers to transport at one inclusive rate or charge, regardless of their classification rating in the NMFC or their differing transportation characteristics.</p> <p>2. Must comply with paragraphs 2-6 outlined in Item 39 above, except 999912-01 includes crated HHG and personal effects, which are excluded under Item 39.</p>	<p>MFTURP-1, 999912-01 was consolidated to reference only where different from 999912. As such removing “including crated household goods or personal effects” is detrimental in determining the difference between 999912-01 from 999912.</p> <p>Update paragraph 2 to change “except for crated household goods” to “except 999912-01 includes crated HHG and personal effects”</p>	TRANSCOM TCJ9 that HHG and Personal Effects need to be removed from FAK 999912 and 999913. They only move under Commodity Code 100251.
11	Landstar	C	103	Secti on B. II. Item 45.1- 2.	4233 - 4237	<p>Change from:</p> <p>1. FAK 999913 Sub 01, consists of commodities which a TSP offer to transport at one inclusive rate or charge, regardless of their classification rating in the NMFC or their differing transportation characteristics.</p> <p>2. Shipments under Item 45 must also comply with paragraphs 2-4 of Item 43 above, except for crated household goods which are excluded under Item 43.</p> <p>Change from:</p>	<p>The MFTRP-1C spelled out 999913 and 999913-01 in full. When moved to the MFTURP-1, 999913-01 was consolidated to reference only where different from 999913. As such removing “including crated household goods or personal effects” is detrimental in determining the difference between 999913-01 from 999913.</p> <p>Update paragraph 2 to change “except for crated household goods” to “except 999913-01 includes crated HHG and personal effects,”</p>	R - SDDC confirmed with TRANSCOM TCJ9 that HHG and Personal Effects need to be removed from FAK 999912 and 999913. They only move under Commodity Code 100251.

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						<p>1. FAK 999913 Sub 01, consists of commodities which a TSP offers to transport at one inclusive rate or charge, regardless of their classification rating in the NMFC or their differing transportation characteristics.</p> <p>2. Shipments under Item 45 must also comply with paragraphs 2-4 of Item 43 above, except 999913-01 includes crated HHG and personal effects, which are excluded under Item 43.</p>	Also adds an s to offer in paragraph 1 to match Item 41.	
12	Landstar	C	104	Section B. II. Item 51.1. a.	4283 - 4284	<p>Change from:</p> <p>a. URC(1) \$ ____ per hundredweight, subject to a minimum charge of URC(2)\$ _____. URC(3) \$ ____ may be applicable.</p> <p>Change to:</p> <p>Landstar's Recommendation:</p> <p>a. URC(1) \$ ____ per hundredweight, subject to a minimum charge of URC(2)\$ _____. URC(3) \$ ____ per person per hour-or fraction thereof, subject to a minimum change per person of URC(4) \$ _____. If a TSP chooses URC(3) and URC(4), a TSP is prohibited from completing URC(1) and URC(2), as a TSP cannot complete URC(1), URC(2), URC(3) and URC(4) on its tender.</p> <p>FedEx's Recommendation:</p> <p>URC(1) \$ ____ per hundredweight, or URC(3) \$ ____ per person per hour or fraction thereof, subject to a minimum charge of URC(2)\$ _____ and/or a maximum charge of URC(4) \$ ____.</p>	<p>The reason for the adjustment to URC(4) is per Section A, IV, C, Accessorial Rates Section F, 1, g (Pg. 49, Lines 2284-2285), "Certain rules (e.g., Redelivery, Item 63) have a maximum change in addition to minimum charges." Another example is Handling Freight at Positions Not Immediately Adjacent to Vehicle, Item 49. It follows the format for URC(1) and URC(2) and matches other rules tariffs which use a per person per hour or fraction thereof subject to a minimum charge per person format. The minimum charge also lines up with other accessorial with a per person/per driver format. For example, the per person format of Item 127 for SRS(4) or the per driver format of Item 55 for SAT(2) and HOL(2).</p>	<p>M – Currently GFM only has URC (1) and (2) in the system. A system change is needed to add URC (3) and URC (4). The TEOW business rules need to be updated as well. 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</p>

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								MFTURP revision.
13	Landstar	A	195	Section F. I. 1.	7905 - 7907	<p>Change from: International is defined as a shipment where at least one of the pickup or delivery addresses is not within the 50 U.S. States and the District of Columbia.</p> <p>Change to: International is defined as a shipment where at most one of the pickup or delivery addresses is within the 50 U.S. States and the District of Columbia.</p>	Shouldn't international also include when the origin or destination is not within the 50 U.S. States and the District of Columbia? For example, country to country (excluding the U.S.).	R - Per TRANSCOM, Non-concur as the existing language does cover what is being conveyed in the carrier's rationale statement.
14	Landstar	A	204	Section F. I. Item 436.1	8274 - 8275	<p>Change from: 1. For domestic/international shipments, the TSP agrees to provide this increased liability coverage for EVC (1) \$__ for each \$100 or fraction thereof.</p> <p>Change from: 1. For domestic/international shipments, the TSP agrees to provide this increased liability coverage for EVC (1) \$__ for each \$100 or fraction thereof over the maximum liability.</p>	Excess Valuation applies to declared cargo liability over the established cargo liability described in F.I.2 & 5. Since much of this information was removed in this draft, "over the maximum liability" should be add.	R - Per TRANSCOM, agree with keeping current language: "For domestic/international shipments, the TSP agrees to provide this increased liability coverage for EVC (1) \$__ for each \$100 or fraction thereof."
15	Landstar	A	208-209		8459 - 8498	Question about ITEM 481 - SIGNATURE AND TALLY RECORD SERVICE (675)/ELECTRONIC SIGNATURE SERVICE placement	Since the requirement to enter 675 is on Section F.1, which deals with Protective Security Services, should this not be listed under "II. Rules Governing Movement of Hazardous, Classified, and Protected (Sensitive) Materials" as that is the section for Protective Accessorials?	R - Per TRANSCOM, Non-concur. The need for 675 can be for any shipment, FAK included. It is not exclusive to

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								HAZMAT and TPS.
16	DCMA Northeast	C	62	Secti on A.V. B.2.b	2640	Add: FW - Failure to submit invoices or linked-eBills in a timely manner: When a TSP fails to submit invoices within 3 business days after the delivery of freight or fails to submit linked eBills by 30 September of each year.	Late submission of invoices or linked-eBills result in delayed payments, funding issues with transportation account codes (TAC) and possible violations of the Prompt Payment Act.	M – SDDC, TRANSCOM and GFM agreed with adding the new service failure code. Once GFM updates the system, both the DTR and MFTURP will update the service failure language congruently.
17	DCMA Northeast	C	62	Secti on A.V. B.2.c	2641	Add: FV - Falsified Billing of accessorial charges on invoices or linked-eBills: This code is used when a TSP includes erroneous or false charges on a linked eBill. Examples of falsified data include pickup dates, delivery dates, accessories and rates.	Some carriers routinely submit invoices and linked eBills with falsified data including pickup dates, delivery dates, accessories, and rates.	M - SDDC, TRANSCOM and GFM agreed with adding the new service failure code. Once GFM updates the system, both the DTR and MFTURP will update the service failure language congruently.
18	DCMA Northeast	C	220	Appe ndix A	8893	Add: SPV - Sprinter Van Equipment Code	Many TSPs offer sprinter vans to transport LTL material up to 7,500 lbs.	R - Per SDDC, the Sprinter Van codes come from TRANSCOM Reference Data Management

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								(TRDM). TRDM stated van codes are already in the Transportation Equipment Type Data Table. The carrier should use those codes instead of a specific brand “Sprinter” for the van selected.
19	DCMA Northeast	.C	232	Appendix C Accessorial	8950	Add: BLA - Protective Blankets: Cargo Moving and Packing Blankets	Many contracts for newly procured high-value electronic items require Protective Blankets to provide added protection of the items during transit. Currently, the only option for TOs to request protective blankets is via Spot Bids since there is not an accessorial for the blankets.	R – Per SDDC, Non-concur. Per DTR Ch 202 paragraph U.1, it is the TO’s responsibility to properly pack, label, describe, and document shipments IAW Chapters 203, 206, and 208 and other regulations. Therefore, if the materials being shipped require protective packaging of any kind, the TO should fund for, and apply

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								that packaging material to the shipment.
20	DCMA Northeast	C	232	Appendix C Accessorial	8950	Add: ETR - E-Track Rail System for cargo vans	May items procured from contractor facilities require E-Track Loading Systems to properly secure the material.	R – Per SDDC, Non-concur. If this request is for a specific type of trailer with this specific system, a new equipment code would be more applicable than an accessorial. SDDC recommends the submitter send a request to USTRANSCOM TRDM to request new equipment codes. TRDM will provide feedback on potentially adding the new code. When implemented, the codes would become available to shipper systems. Carriers could then build tenders with

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								those equipment codes.
21	DCMA Northeast	C	232	Appendix C Accessorial	8950	Add: USC - U.S. Citizenship Driver Requirement	Many items procured from contractor facilities require US Citizens only to transport the material during first destination transportation services.	R – Per SDDC, Non-concur. SDDC recommends using protective services that would adequately provide the level of service the submitter is requesting. Using the appropriate protective service would require drivers with security clearances. If the unclassified material referenced in the suggested change has a CIIC that is not covered in DTR Ch. 205, SDDC recommends the submitter send a change request to TRANSCOM. This would ensure the item requires protective

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								services. The instructions for submitting a DTR change are located on TRANSCOM's website.
22	ABFS	A	95	Secti on B. II. Item 21.5.	3947 - 3950	<p>Change from: .If loading or unloading extends beyond the allowable free time, then the TSP can assess a detention charge based on a charge of DEP(1) \$ _____ for each hour (60 minutes), or fraction thereof, that the vehicle is delayed beyond the allowable free time, during normal operating hours until released by the shipper or consignee.</p> <p>Change to: If loading or unloading extends beyond the allowable free time, then the TSP can assess a detention charge based on a charge of DEP(1) \$ _____ for each hour (60 minutes), and prorated for the fraction thereof, that the vehicle is delayed beyond the allowable free time, during normal operating hours until released by the shipper or consignee.</p>	Current wording is not specific on how fractions of each hour are calculated.	R – Per SDDC, Non-concur. Including the verbiage "prorated" could potentially cause confuse amongst the TO's. The current language is consistent with language in paragraph I. Storage.
23	TRANSC OM TCJ4-LC	A	6	Secti on A. II. B. 3.	593- 601	<p>Change from: TSPs will utilize their own commercial BLs when authorized (e.g. when transportation systems are inoperable, during holidays and/or weekends, or when there is no access to transportation personnel, also package express shipments are excluded) upon approval of TO/shipper/consignor or USTRANSCOM, TCJ4-LC Commercial</p>	Change needed for proper management of air tenders and air spot bids.	R – Per SDDC, Non-concur. SDDC does not see the need to remove the sentence unless there is more detailed justification provided as to

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						<p>Services Branch for air shipments. Shippers should be advised that additional carrier or Government required paperwork (e.g. U.S. export documentation) might be required to accompany the international/domestic shipment.</p> <p>Change to: Remove sentence</p>		why this removal would be beneficial.
24	TRANSC OM TCJ4-LC	C	104	Secti on B. II. Item 55.1. a-c.	4306 - 4311	<p>Change from:</p> <p>a. PUD(1) \$____per hour or fraction per driver before or after installation's normal operating hours as indicated in TFG.</p> <p>b. SAT(1) \$____ per hour or fraction per driver on Saturdays, subject to a minimum charge of SAT(2) \$ per driver.</p> <p>c. HOL(1) \$____ per hour or fraction per driver on Sundays and holidays, subject to a minimum charge of HOL(2) \$ per driver.</p> <p>Change to:</p> <p>a. PUD (1) \$__per rated pound before or after installation's normal operating hours as indicated in TFG.</p> <p>b. SAT (1) \$__per rated pound on Saturdays, subject to a minimum charge of SAT (2) \$ __whichever is greater.</p> <p>c. HOL (1) \$__per rated pound, subject to a minimum charge of HOL(2) \$__, whichever is greater.</p>	Change needed for proper management of air tenders and air spot bids.	R – Per SDDC, Non-concur. Every tender would have to change to accommodate this suggested change. The rationale provided does not justify a change of this magnitude. SDDC recommends the submitter provide the basis for suggesting this potential change including what the benefit would be.

