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U.S. Department of Transportation
1200 New Jersey Ave SE
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ATTN: Docket No. DOT-OST-2026-1387

Re: Shaping the Future of the Bureau of Transportation Statistics

The American Society of Civil Engineers (ASCE) is grateful for the opportunity to provide comments to the Bureau of Transportation Statistics (BTS) as the agency seeks input on its products, the user experience associated with them, and data gaps across the transportation sector. The perspective offered in this document is in response to the request for information (RFI) issued by BTS on June 1, 2026.

Founded in 1852, ASCE is the nation's oldest engineering society. ASCE represents more than 160,000 members of the civil engineering profession in 177 countries. Whether they practice in private firms, government offices, or universities, ASCE's members are committed to advancing the profession of civil engineering and protecting public health, safety, and welfare. The professional disciplines of ASCE's members are as varied as the transportation sector itself. ASCE's members operate across all of the modes for which BTS collects and provides information, including aviation, roads, railroads, waterways, pipelines, transit, and bicycle and pedestrian infrastructure. As the professionals who plan, design, construct, and maintain critical aspects of our nation's transportation infrastructure, ASCE's members are well suited to comment on BTS's products, data needs, and emerging trends.

ASCE values the tools and data provided by BTS, and we thank the agency for consistently serving as a source of valuable information. ASCE also recognizes that, of the 13 principal statistical agencies in the federal statistical system, BTS operates with the smallest amount of monetary resources. According to the Bipartisan Policy Center, BTS's annual

budget authority in 2025 was \$27 million, lower than the Office of Research, Evaluation, and Statistics' \$29 million and the Bureau of Justice Statistics' \$59 million.¹ The Bureau of Labor Statistics, for comparison, had an annual budget authority of \$704 million in 2025.

BTS's contract authority is funded as an allocation from the Highway Trust Fund (HTF), which is supported by federal fuel tax revenue and has been operating at a deficit for years. Because the federal fuel tax rate has remained unchanged since 1993, it has not generated sufficient revenue for the HTF. The ailing HTF has constrained BTS's ability to innovate and provide relevant statistics on the transportation system at its full capacity.

For this comment, ASCE would like to address some of the **questions BTS included in its RFI**.

ASCE's responses to BTS's questions

1. *Portfolio Utility*: How are BTS data and statistical resources currently used, and how would improved guidance (such as technical documentation or video tutorials) provide more value from the existing product portfolio?

- ASCE relies on data collected and reported by BTS to evaluate the nation's infrastructure and inform its national and state advocacy. Just as civil engineers rely on accurate, up-to-date information as they plan projects, ASCE is a strong proponent of data-driven decision-making. For years, ASCE has valued BTS as a partner and a source of transportation data.
- BTS data is particularly important in the research and composition of ASCE's *Report Card for America's Infrastructure*, which is released every four years and grades the nation's major infrastructure categories using an "A" to "F" school report card format. ASCE's 2025 Report Card reflected an overall "C" grade, an improvement from the 2021 Report Card grade of "C-".
 - Nearly half of the 18 infrastructure categories assessed in the Report Card saw grade increases, including roads improving from a "D" to a "D+" and transit improving from a "D-" to a "D". For the first time since 1998, no category received a "D-", although nine categories remained in the "D" range. Ports received the highest grade on the Report Card, earning a "B."
- Several of the 2025 Report Card chapters employed BTS data. Information from BTS on fatalities, freight movement, on-time performance and delays, port equipment and operations, railroad mileage, bicycle expenditures and bikeshare ridership, and

¹ <https://bipartisanpolicy.org/explainer/the-federal-statistical-system-provides-immense-value-and-faces-significant-challenges/>

employment in transportation can be found across the Report Card chapters on aviation, inland waterways, ports, rail, roads, and transit.

- In addition to the national Report Card, ASCE maintains a robust program of state report cards led by ASCE's member engineers throughout the country.
 - Using the same criteria as the national Report Card, state report cards provide a localized assessment of the state's infrastructure performance, a description of key challenges the state faces, and recommendations to raise the grade.
 - When conducting research for the state report cards, ASCE members and staff depend largely on data collected by states. If it was possible to extract data summaries compiled by states within BTS's database offerings, that could reduce time associated with extracting and tabulating state data and benefit ASCE's state report card process.

3. *Core Data Requirements:* How should BTS amend the transportation data it collects to meet the data and statistical needs of government and industry decision makers?

- ASCE recommends the reincorporation of waterborne freight movement data on the Mississippi River into the Port Performance Freight Statistics Annual Report to Congress.
 - Section 3.2 of BTS's 2024 Port Performance Freight Statistics Annual Report to Congress contained information on tonnage by mode between states on the Upper Mississippi River System and Louisiana.²
 - This information provided valuable perspective on freight movement that occurred outside of major ports along the East and West Coasts.
 - However, BTS's 2025 and 2026 annual reports did not contain this information. Rivers and inland ports play a vital role in the nation's economy, and ASCE recommends this data be collected and added back in to subsequent reports.
 - In general, information on freight movement that takes place outside of coastal ports is appreciated. The country's navigable waterways, including the Great Lakes – St. Lawrence Seaway System and the Ohio, Mississippi, and Missouri Rivers, play an important role in transporting goods. ASCE recommends BTS provide timely data on these vital parts of the supply chain.
- Information about railroad infrastructure needs can be challenging to find. Railroads do not provide publicly available aggregated information on the condition

² https://www.bts.gov/sites/bts.dot.gov/files/2024-01/2024_Port_Performance_Report_0.pdf

of their infrastructure or ongoing maintenance priorities. To inform ASCE's research and policy engagement, ASCE asks BTS to collaborate with other agencies to produce current data on the condition and maintenance needs of railroad infrastructure.

- ASCE recommends BTS work with the Federal Highway Administration (FHWA) to develop a dataset on the total mileage of bike lanes throughout the country.

4. *Analytical Outputs*: What actions can BTS take with its statistical products to make them more useful for transportation planning, policy making, operations, research, and analysis?

- For the ports chapter of the 2025 *Report Card for America's Infrastructure*, ASCE relied heavily on BTS's 2025 Port Performance Freight Statistics Annual Report to Congress. This report provides a valuable overview of the nation's ports, their economic activity, and their infrastructure.
 - One action that would improve the usefulness of the Port Performance Freight Statistics Annual Report would be instructions on how each of the tables and charts presented in the report, which is published as a PDF document, can be accessed digitally through BTS's dashboards. Analyzing data digitally offers the user more options for visualizing the information, such as the ability to zoom in or isolate certain metrics.
 - For example, it would be helpful to have guidance on how to access BTS's graph on the weekly number of containerships waiting to dock at U.S. ports online.
 - In general, increased guidance on how to view the data included in reports through BTS's dashboards would also be appreciated.
 - Graphs depicting the total number of ship-to-shore gantry cranes at ports year-over-year and the percentage of ports with on-dock rail connections would also be insightful.
 - Percentage tonnage by mode exiting each major port would be helpful in understanding traffic patterns around ports.

15. *Ongoing Engagement*: What are the best methods to get news or technical updates about changes to BTS data and products (e.g., technical webinars, social media, a monthly newsletter, etc.) to ensure that the updates are timely?

- Regular updates via email are helpful. ASCE staff primarily gets acquainted with BTS's latest data and reports by periodically checking BTS's website. Email updates help interested parties access the most recent information as soon as it's released.

- Also, ASCE recommends close communication between BTS and the Maritime Administration (MARAD) to ensure data across the agencies' platforms matches.
 - For example, BTS's 2025 Port Performance Freight Statistics Annual Report to Congress states there are 299 waterway ports throughout the country. However, MARAD's website states there are more than 300 ports throughout the country. ASCE recommends BTS coordinate with MARAD to make sure MARAD updates its website content as BTS releases material.

Conclusion

ASCE would like to thank BTS for accepting input on its wide-ranging resources and transportation data needs. ASCE values BTS as a partner and is prepared to answer any questions as the agency collects feedback.