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Vice President, Domestic Policy

October 2, 2026

Morteza Farajian
Executive Director
Build America Bureau
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Comments of the National Association of Manufacturers; America's Great Corridors of Commerce; Request for Information; 91 Fed. Reg. 53,479 (August 18, 2026); Docket No. DOT-OST- 2026-3269

Dear Executive Director Farajian,

The National Association of Manufacturers (NAM) appreciates the opportunity to provide comments on the U.S. Department of Transportation's ("DOT" or "the agency") Request for Information (RFI) regarding the America's Great Corridors of Commerce (AGCC) initiative.

The NAM is the voice of the manufacturing community and the leading advocate for a policy agenda that supports and empowers the 13 million people who make things in America. As the largest manufacturing association in the U.S., the NAM's membership includes businesses of all sizes, across all industrial sectors, and in all 50 states. Manufacturers collectively contribute \$3 trillion to the U.S. economy—and enhancing America's critical infrastructure capacity and connectivity is critical to sustaining the manufacturing strength that underpins our nation's prosperity.

Manufacturers strongly support the development of reliable, affordable, and resilient energy, water, and communications infrastructure. Access to infrastructure is a key factor manufacturers consider when deciding where to locate, expand, and invest. Demand for critical infrastructure, particularly electricity, from manufacturing, data centers, logistics, and other industrial activities is increasing, while many regions face constraints in transmission capacity and utility interconnection. At the same time, transportation agencies and railroads face significant capital needs and deferred maintenance.

We appreciate the agency's creativity in this proposal, seeking to address these challenges by leveraging existing transportation rights-of-way (ROWs) for the strategic colocation of utility infrastructure. By facilitating voluntary partnerships among ROW owners, utilities, infrastructure developers, and private investors, AGCC could accelerate infrastructure deployment, create new revenue opportunities for transportation assets, and strengthen the connection between transportation infrastructure and economic development. Manufacturers could see benefits from improved infrastructure resiliency, the opportunity to strategically locate along corridor hubs, and to provide the hardware and machinery needed for buildouts.

For these reasons, the NAM supports the AGCC concept and encourages DOT to implement it in a manner that is technology-neutral, market-driven, and focused on measurable economic

and infrastructure benefits. The Department should prioritize safety, predictable permitting, clear risk allocation, practical technical standards, and meaningful engagement with manufacturers and other major industrial energy users.

1. Critical challenges and barriers to deploying the AGCC concept

The principal challenges to AGCC implementation are technical feasibility, safety, siting and permitting, financing, construction timeliness, regulatory coordination, community acceptance, and market demand. These challenges are manageable, but they will require corridor-specific planning, early coordination, and a clear allocation of responsibilities among project participants.

Technical feasibility and corridor planning. Existing highway and rail ROWs were primarily designed to support transportation functions. Available space, utility separation requirements, maintenance access, safety setbacks, and future transportation expansion needs may limit the feasibility of colocation in particular locations. These considerations will vary significantly by corridor and by the type of utility being developed.

The NAM recommends that DOT should support corridor-specific engineering assessments, geospatial mapping, feasibility studies that identify locations where utility colocation can occur while preserving long-term transportation flexibility. This should ideally occur simultaneously with local community outreach to lower and avoid the risk of projects ending up tied up in long-term litigation. Planning should evaluate the suitability of different colocation configurations, including underground channels, above-ground installations, and other approaches, rather than assuming that a single design will be appropriate for every corridor.

Safety during construction, operations, and maintenance. Safety must remain a foundational consideration. Utility construction, operation, and maintenance activities should be coordinated to minimize impacts on transportation users, workers, and surrounding communities. Clear standards for utility access, emergency response coordination, inspection, and maintenance responsibilities should be established early in project development.

DOT should encourage the development of best practices for working within active transportation corridors, including coordination of construction schedules, access to utility facilities, emergency response procedures, and protocols for addressing conflicts between transportation and utility operations.

Siting, planning, and permitting. Permitting and regulatory uncertainty remain among the most significant barriers to infrastructure development across America. AGCC should focus on predictable timelines, coordinated federal reviews, and clear guidance regarding applicable environmental and permitting requirements.

The federal government can help reduce project risk by providing coordinated technical assistance, identifying applicable environmental review pathways, and helping project sponsors understand how existing federal tools can be used to streamline reviews. A transparent and coordinated process can reduce uncertainty while maintaining appropriate environmental and safety protections. The NAM has laid out [substantive permitting reform policy prescriptions](#), and for AGCC, clearly designating a lead federal permitting agency and increasing the use of categorical exclusions under the National Environmental Policy Act would be particularly appropriate.

The NAM also encourages DOT to work with states and other ROW owners to identify opportunities for greater consistency in utility accommodation policies, permitting expectations, and project planning requirements.

Funding and financing. Manufacturers believe that the AGCC should be designed to facilitate access to the full range of available federal financing and funding tools. The Build America Bureau can play an important role in helping project sponsors understand available financing options, evaluate project economics, and structure viable public-private partnerships.

DOT should also provide guidance on how corridor revenue-sharing arrangements can support transportation improvements while maintaining the economic viability of utility projects. The Department should encourage project sponsors to evaluate total system costs, including construction, operations, maintenance, and long-term reliability.

Construction timelines. One of AGCC's principal advantages is the potential to reduce the time required to deploy infrastructure. To realize this benefit, DOT should support early planning, coordinated reviews, and clear decision-making responsibilities. The Department should also encourage the use of standardized processes and model agreements where appropriate, while preserving flexibility for corridor-specific needs.

Market alignment. The NAM strongly believes that the AGCC should be responsive to actual and projected market demand. Therefore, corridor selection should consider the needs of manufacturing facilities, freight-heavy industries, distribution centers, data centers, and other critical economic activity that depend upon reliable and affordable energy access. Specifically, helping to coordinate across industries to identify where and how co-locations of manufacturing industries into "hubs" would be most appropriate and of interest.

The Federal government can help by providing data, planning tools, and economic development analyses that identify areas where infrastructure deployment would generate the greatest industrial and economic benefits.

Federal and State regulations and policies. AGCC will be most effective if federal and state policies are aligned. DOT should encourage participating states and transportation agencies to develop common utility accommodation standards, permitting expectations, and infrastructure planning processes wherever possible.

Community engagement and acceptance. Community engagement should begin early and continue throughout project development. AGCC projects should demonstrate how infrastructure investment can support local economic development, improve reliability, and create opportunities for communities along the corridor.

Manufacturers and other industrial energy users should be included in this engagement. Their input can help identify future infrastructure demand, inform project design, and ensure that corridor investments support long-term economic growth.

2. Projects crossing jurisdictional borders

Multi-state corridors present a significant opportunity to unlock economic growth, but they also introduce coordination challenges.

The NAM believes that DOT can play a key role here by encouraging participating states and transportation agencies to develop common utility accommodation standards, permitting expectations, and infrastructure planning processes wherever possible. Consistency across jurisdictions can reduce costs, improve project certainty, and increase private-sector participation.

The Department should also establish frameworks that promote transparent revenue-sharing and operational responsibilities across jurisdictions. Clear allocation of costs, benefits, liabilities, and maintenance responsibilities can reduce uncertainty for project sponsors and corridor users.

From a manufacturing perspective, corridor selection should prioritize routes that connect major manufacturing regions, freight corridors, ports, distribution hubs, and industrial centers. Economic competitiveness benefits are likely to be greatest when utility infrastructure development aligns with existing and planned freight and manufacturing activity. Interstate coordination should therefore include consideration of regional industrial development plans and future energy demand from major employers and manufacturers. DOT should encourage states to coordinate with utilities and other stakeholders to identify infrastructure needs that extend beyond individual state boundaries. Additionally, there are likely benefits to be gained from greater federal government coordination. For instance, DOT should seek to leverage existing work at the Department of Energy with respect to power generation and regional transmission line development.

3. Voluntary AGCC public-private partnership model

The NAM supports public-private partnerships to leverage existing resources in ways neither sector can do on their own. The proposed P3 approach has the potential to accelerate infrastructure deployment by aligning the interests of transportation agencies, utilities, manufacturers, infrastructure developers, and private investors.

However, successful implementation will require clarity regarding long-term governance, operational responsibilities, revenue structures, maintenance obligations, and risk allocation among project participants. Project sponsors and investors will need confidence that contractual arrangements remain stable over the life of the project.

The NAM supports DOT's efforts to develop tools and model agreements that can provide consistency across projects while preserving flexibility for state and local needs. Federal support could include template agreements, procurement best practices, technical guidance, and educational resources that help transportation agencies and stakeholders evaluate potential business models.

The Department should also ensure that the P3 model does not limit participation by utilities, manufacturers, or other private-sector stakeholders. A flexible approach can help attract a broader range of investment and encourage innovative infrastructure solutions. Manufacturers and major industrial energy users should be recognized as important stakeholders during corridor planning and development. Understanding future industrial development locations and energy demand will help improve project economics and ensure that infrastructure investments support long-term economic growth.

4. Technical assistance and support from the federal interagency task force

For manufacturers, the most valuable federal support would be assistance that improves project predictability, reduces administrative burdens, and facilitates coordination among stakeholders. Therefore, the NAM recommends that DOT's proposed interagency task force prioritize:

- Coordinated federal permitting and environmental review support.
- Guidance on utility colocation best practices and engineering standards.
- Mapping tools that identify opportunities aligned with industrial growth, freight activity, and projected energy demand.
- Technical assistance for multi-state coordination and stakeholder engagement.
- Information regarding available federal financing, loan programs, and funding opportunities.
- Best practices for integrating energy, communications, transportation, and economic development objectives.
- Support for identifying and resolving potential conflicts among transportation, utility, and other infrastructure needs.
- Guidance on long-term operations, maintenance, and asset management responsibilities.

In addition, the task force should engage with manufacturers and other major industrial users to better understand future infrastructure requirements and economic development opportunities within proposed corridors. Such engagement will help ensure AGCC investments support domestic production, supply chain resilience, and job creation.

5. AGCC designation process

The NAM generally supports DOT's proposed approach to designate a limited number of corridors for enhanced technical assistance and federal coordination. Concentrating federal resources on a targeted set of projects may help demonstrate the potential value of the AGCC concept and establish replicable best practices.

As DOT develops the designation process, manufacturers encourage the Department to consider factors beyond infrastructure readiness and market demand. For instance, evaluation criteria should also reflect economic competitiveness outcomes, including support for domestic manufacturing, freight movement, energy reliability, and regional economic development.

The agency should also ensure that stakeholders beyond transportation agencies and utilities have opportunities to provide input during corridor selection. Manufacturers, industrial energy users, economic development organizations, and freight stakeholders can provide valuable insight regarding future infrastructure demand and economic growth opportunities.

A potential concern is that limiting designation to a small number of corridors each year could create geographic disparities or favor projects with greater planning resources. DOT should seek broad geographic diversity and consider opportunities in emerging industrial regions as the program matures.

The NAM also encourages DOT to ensure that the designation process is transparent and that non-designated corridors are not unnecessarily disadvantaged. The broader AGCC model should remain available to other ROW owners, and the Department should provide

informational resources that allow additional projects to pursue the P3 approach where appropriate.

6. Accelerating infrastructure deployment and regional economic development

The NAM believes that the AGCC model has the potential to accelerate the deployment of power and communications infrastructure compared to traditional greenfield development by leveraging existing transportation corridors, reducing right-of-way acquisition challenges, improving stakeholder coordination, and streamlining permitting processes.

From an industrial perspective, faster infrastructure deployment can enhance the attractiveness of regions seeking to expand manufacturing, logistics, advanced technology, and other energy-intensive industries. As access to reliable and scalable utility infrastructure increasingly influences siting and expansion decisions, reducing deployment timelines can help communities compete more effectively for new investment.

The AGCC model may also strengthen the connection between transportation infrastructure and economic development by encouraging utility investments along corridors that support major freight movements and industrial activity. Aligning infrastructure planning with freight and manufacturing needs can improve economic competitiveness, support job creation, and strengthen supply chain resilience.

Beyond deployment speed, AGCC corridors could provide greater predictability for industrial investment decisions. Clear visibility into expected infrastructure capacity, project timelines, and future corridor development would allow manufacturers to incorporate that information into site selection and capital planning processes. Increased certainty can reduce investment risk, improve long-term planning, and enhance a region's ability to attract and retain manufacturing investment.

The NAM encourages DOT to consider how AGCC can support a broad range of manufacturing sectors, including energy-intensive industries, advanced manufacturing, logistics, and other critical supply-chain activities. Infrastructure investment should be evaluated not only in terms of immediate deployment but also in terms of its ability to support long-term industrial growth.

7. Affordability and least-cost, least-risk infrastructure

The NAM supports DOT's objective of deploying infrastructure in a manner that promotes affordability, reliability, and long-term economic value.

To support this goal, AGCC projects should prioritize infrastructure solutions that provide the greatest long-term benefits relative to total system costs. Corridor selection should consider not only construction costs, but also reliability, resilience, utilization rates, maintenance costs, and economic development impacts.

The program should also remain technology-neutral and allow for a diverse range of infrastructure solutions where appropriate. Maintaining flexibility will help ensure that infrastructure investments can adapt to changing technologies, market conditions, and regional needs while avoiding unnecessary costs for ratepayers and customers.

Finally, the NAM encourages DOT to consider the needs of large industrial energy users and manufacturers when evaluating project benefits. Industrial competitiveness depends heavily on

access to reliable and affordable energy. Infrastructure investments that improve energy availability and system efficiency can help support domestic manufacturing, economic growth, and long-term affordability for all customers.

The NAM urges DOT to ensure that AGCC projects are evaluated on their ability to deliver measurable benefits to both infrastructure users and the broader economy. The agency should avoid approaches that unnecessarily increase utility rates or shift costs to customers without corresponding benefits.

The NAM is supportive DOT's efforts to develop America's Great Corridors of Commerce and believes the initiative could play an important role in strengthening the nation's infrastructure, supporting domestic manufacturing, and improving economic competitiveness.

The success of AGCC will depend on a practical, voluntary, and market-driven approach that prioritizes safety, technical feasibility, predictable permitting, and clear allocation of responsibilities. DOT should also ensure that corridor selection and project development reflect the needs of manufacturers and other major industrial energy users.

By leveraging existing transportation rights-of-way, coordinating federal and state resources, and facilitating innovative public-private partnerships, AGCC has the potential to accelerate infrastructure deployment, improve reliability, and support long-term economic growth.

The NAM appreciates the opportunity to provide these comments and looks forward to working with DOT and other stakeholders as the AGCC initiative develops.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Phalen", written over a light yellow rectangular background.

Christopher Phalen
Vice President, Domestic Policy