



Comment Letter to the U.S. Department of Transportation

Docket No. DOT-OST-2025-1326

Submitted by Dan Johnson, President

Wisconsin Motor Carriers Association

October 13, 2025

On behalf of the Wisconsin Motor Carriers Association, please accept this comment letter in response to the Department's inquiry regarding cargo theft risks in the U.S. supply chain pursuant to Docket No. **DOT-OST-2025-1326**. Thank you for the opportunity to submit these comments.

The Department has requested responses to fourteen specific questions in the Docket, which have been answered below using industry research and information.

1. What are the most significant cargo theft risks?

The most pressing risks include strategic theft (fictitious pickups, fraudulent bills of lading, double brokering, hostage freight), straight theft (burglary, pilferage, hijacking), organized theft groups (OTGs), cyber-enabled diversion, and insider threats. Strategic theft has increased by over 1500% since 2021, often involving transnational crime rings.

2. How do these risks vary across different types of goods movement?

Truck-borne freight faces the highest risk. Rail-borne freight has seen a dramatic rise in thefts, especially intermodal containers. Water and air freight are moderately affected, with multimodal exchange points (ports, airports, intermodal facilities) being particularly vulnerable.

3. How much of a challenge is cargo theft for shippers and carriers based on mode?

- Truck: Very High
- Rail: High Water: Moderate
- Air: Moderate to High
- Multimodal: Very High



4. **What are the barriers to detection, response and reporting of such incidents?**

Barriers include underreporting due to reputational concerns, jurisdictional confusion, lack of law enforcement training, and inconsistent definitions. DOT can reduce these barriers by centralizing reporting, enhancing FMCSA fraud tools, and funding law enforcement training.

5. **How can law enforcement better coordinate cargo theft cases?**

Federal, state, and local agencies should form multi-jurisdictional task forces, utilize centralized intelligence centers, and improve data sharing.

6. **What role should Federal intelligence functions play in identifying and mitigating theft risks?**

Federal intelligence should proactively identify threats, support investigations, and coordinate internationally to track transnational criminal organizations.

7. **How should DOT Operating Administrations address cargo theft?**

FMCSA should strengthen registration security. FHWA can promote secure infrastructure. FRA, MARAD, FAA, and PHMSA should support intermodal security and avoid duplicating FBI/DHS roles.

8. **What data collection improvements should DOT pursue?**

DOT should integrate cargo theft reporting with FMCSA inspections, CBP data, and law enforcement systems. A centralized real-time reporting platform is recommended.

9. **Are there regulations that cause vulnerabilities that lead to cargo theft?**

FMCSA registration systems are exploited for identity theft and fraud. Legal MC number transfers are abused. Verification processes need strengthening.

10. **What industry best practices or technologies have proven most effective in reducing both opportunistic thefts and organized thefts?**

Technologies such as GPS tracking, electronic seals, AI monitoring, secure parking, asset tags, SOS buttons, and cybersecurity protocols have proven effective.



11. How should DOT measure success in reducing cargo theft?

Metrics should include reduction in theft incidents, prosecution rates, recovery rates, reporting participation, and response times.

12. To what agency or jurisdiction does industry currently report cargo theft? What barriers prevent industry from reporting theft incidents to Federal agencies? How can DOT reduce these barriers?

Industry often reports to local police or insurers. Barriers include jurisdictional confusion and lack of follow-up. DOT should promote centralized reporting and educate stakeholders.

13. Which commodities face the highest risks?

Food & beverage, electronics, pharmaceuticals, apparel, and agricultural goods are most targeted. Risks vary by commodity origin (domestic, imported, exported).

14. What potential practices could DOT initiate to test innovative approaches to cargo theft prevention, reporting, and enforcement partnerships?

DOT should consider a pilot program for secure parking, AI surveillance, blockchain for chain-of-custody, public-private partnerships, cybersecurity initiatives, and real-time data sharing platforms.

The Wisconsin Motor Carriers Association appreciates the Department's attention to this critical issue and urges swift action to address cargo theft through coordinated enforcement, regulatory reform, and stakeholder engagement.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "D. Johnson", with a long horizontal flourish extending to the right.

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