



NATIONAL STONE, SAND
& GRAVEL ASSOCIATION

July 31, 2026

Mr. Edward Strocko
Acting Director, Bureau of Transportation Statistics
c/o Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE, West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: Request for Information — Shaping the Future of the Bureau of Transportation Statistics; Docket No. DOT-OST-2026-1387

Dear Acting Director Strocko:

The National Stone, Sand & Gravel Association (NSSGA) appreciates the opportunity to respond to the Bureau of Transportation Statistics' (BTS) Request for Information (RFI) on the future of transportation data, statistics and analytical tools. NSSGA represents the producers of crushed stone, sand and gravel — the aggregates that form the literal foundation of the nation's roads, bridges, airports and buildings.

Aggregates are the largest freight commodity in the United States by weight. The 2022 Commodity Flow Survey (CFS) ranked gravel and crushed stone first among all commodities at approximately 1.9 billion tons shipped, with natural sands contributing roughly 400 million additional tons. Since aggregates are high-volume, low-unit-value materials, their delivered cost — and therefore the cost of every infrastructure project — is driven largely by haul distance and mode. Few industries depend more directly on the quality of BTS's freight data.

This response is grounded in NSSGA's direct, hands-on experience analyzing BTS data. NSSGA staff regularly use CFS data to examine average haul distances, state-to-state material flows, and modal patterns for aggregates. Our comments address Questions 1 through 11, 14, and 16 of the RFI, as indicated in each section below.

1. How NSSGA Uses BTS Data (Questions 1, 7)

NSSGA uses CFS data (SCTG codes 11, natural sands, and 12, gravel and crushed stone) in three principal ways: analyzing average haul distance by state, which serves as a proxy for local material accessibility; tracking state-to-state material flows; and examining commodity movement by transportation mode. These analyses inform NSSGA's engagement on infrastructure policy, permitting and resource-access issues.



The CFS is the only national, public source that links commodity, geography, shipment distance and mode for aggregates. There is no private-sector substitute, which is precisely why the data-quality and timeliness issues described below matter so much.

2. Data Quality, Coverage and Consistency (Questions 3, 4, 5, 8)

In compiling state-level average haul distances for the two aggregates commodities using the 2017 and 2022 CFS, NSSGA encountered significant coverage gaps and consistency problems:

- **Missing data.** Roughly 40 state-commodity combinations were missing for at least one of the two survey years, and several states (for example, Alaska, Colorado, Idaho, Iowa and Oklahoma for natural sands, and Minnesota for gravel and crushed stone) had no published estimate in either year.
- **Implausible five-year swings.** Reported average shipment distances changed by factors of two to nearly seven between 2017 and 2022 in many states — for example, natural sands in Michigan rose from 25 to 169 miles, gravel and crushed stone in Delaware rose from 23 to 140 miles and natural sands in Alabama fell from 109 to 34 miles. Aggregates markets are stable and local; changes of this magnitude are far more likely to reflect sampling or estimation artifacts than real shifts in the industry.
- **Implausible outliers.** The 2017 CFS reports an average shipment distance of 402 miles for gravel and crushed stone in Vermont and 748 miles for natural sands in Connecticut. Construction aggregates typically move well under 50 miles by truck; values like these cannot reflect typical construction-aggregates movements and erode user confidence in the series.

NSSGA recognizes that CFS estimates are published with coefficients of variation, and we commend that practice. However, reliability information could be made more actionable: BTS should prominently flag state-by-commodity estimates whose reliability falls below defined thresholds, apply plausibility checks before publication, and increase sample coverage for high-volume, low-value commodities so that state-level estimates are consistent and comparable across survey cycles.

3. Timeliness and Frequency (Questions 2, 3, 5, 14)

The CFS is conducted once every five years, and results take years to reach users: final estimates from the 2022 survey were not released until June 2025 — roughly two and a half years after the reference year — and the public-use microdata followed in January 2026. In practice, users may rely on estimates that are up to seven or more years old, a serious limitation for planning multi-year infrastructure programs, shifting supply chains and regional demand surges. More frequent measurement of key freight indicators, even for a limited set of high-tonnage commodities, would substantially



increase the value of the BTS portfolio. The e-ticketing opportunity described next offers a practical, low-cost path to that goal.

4. Key Recommendation: Leverage State DOT E-Ticketing Data (Questions 2, 3, 10, 16)

State departments of transportation are rapidly adopting electronic ticketing (e-ticketing) for construction material deliveries. Every e-ticket records, at minimum, an origin (quarry or plant), a destination (project site), a material type and a quantity — exactly the data elements needed to measure haul distance from quarry to project. NSSGA encourages BTS to partner with state DOTs and the Federal Highway Administration (FHWA) to collect and organize anonymized e-ticketing data as a new statistical source. Compared with the CFS, such crowd-sourced administrative data would be:

- Continuous rather than quinquennial, enabling annual or even quarterly haul-distance indicators;
- Far less expensive than survey collection, consistent with BTS’s goal of more timely, less costly products; and
- Grounded in actual delivery records rather than sampled shipper responses, addressing the quality issues described in Section 2.

This is a solid example of the “new data sources and new analytical methods” BTS seeks, and NSSGA would welcome the opportunity to help pilot it.

5. Commodity Definitions and Granularity (Questions 3, 6, 16)

Two classification changes would greatly improve the usability of BTS aggregates data: Harmonize with USGS commodity definitions. The U.S. Geological Survey — the authoritative source for aggregates production statistics — reports crushed stone and construction sand and gravel as separate commodities. BTS instead combines gravel with crushed stone (SCTG 12) and reports natural sands separately (SCTG 11). Since the categories do not align, users cannot join BTS movement data with USGS production data. Matching commodity definitions across federal statistical agencies would multiply the value of both datasets.

Distinguish construction aggregates from specialty and industrial products. The 2022 CFS shows numerous long-distance interstate movements of these commodities — for example, gravel and crushed stone shipped from California to Pennsylvania and Florida — and many similar instances appear throughout the origin-destination data. Construction aggregates are almost never economical to move such distances; these flows almost certainly represent specialty or industrial products (for example, industrial sands or specialty stone). Finer commodity breakdowns would prevent such movements



from distorting haul-distance averages and interstate flow statistics for construction materials — and may explain some of the anomalies noted in Section 2.

6. Mode and Distance Relationships (Questions 4, 6)

CFS mode data confirm that aggregates are overwhelmingly move by truck over short distances, with rail and water serving longer hauls. This distance-mode relationship is analytically important — it determines where rail and port capacity can substitute for local supply — but it must currently be inferred from separate tables. NSSGA recommends that BTS publish cross-tabulations of shipment distance bands by mode at the commodity and state level, so users can directly observe how mode choice varies with haul length.

7. Supply Constraints and Permitting Impacts (Questions 3, 4, 5, 16)

A key gap in current transportation datasets is their limited ability to reflect how resource availability and permitting constraints shape freight patterns. When access to locally available materials is restricted, haul distances lengthen, transportation demand grows and infrastructure systems absorb added strain. Enhanced BTS data — particularly reliable, frequent haul-distance statistics — would help quantify these impacts and support more transparent, data-informed decisions on land use, permitting and resource access.

8. Data Delivery and Modern Integration (Questions 9, 10, 11)

NSSGA’s experience illustrates both the progress made and the remaining gaps in data delivery. Recent CFS cycles (2017 and 2022) are available through the Census Bureau’s Data API (i.e. the CFS Area series), which allows analyses to update programmatically when new data are released — a clear improvement. For earlier survey years, however, data must be assembled manually from files scattered across different web pages, often with inconsistent attributes and formats depending on where they are accessed. NSSGA recommends extending consistent, well-documented API coverage to all historical CFS cycles, standardizing schemas and attribute definitions across years and access points, and maintaining complete machine-readable availability at full commodity-by-state detail. These improvements would make BTS products far easier to integrate with Python, R and AI-assisted analytical workflows.

9. Engagement Through the Working Group on Covered Resources

Congress established the Working Group on Covered Resources, also called the ROCKS Act Working Group, under section 11526(b) of the *Infrastructure Investment and Jobs Act* to study access to covered resources — including aggregates — for infrastructure projects. We appreciate the Department’s thorough review of applicants to the working group, and respectfully urge the Department to promptly make appointments. Once constituted, the Working Group will be well positioned to provide practical use cases, help identify data gaps, validate dataset usability and support pilots such as the

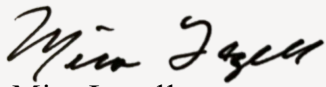


e-ticketing initiative recommended above. NSSGA encourages BTS to establish a coordination channel with FHWA so that the Working Group's findings can inform BTS data development as soon as the group is seated.

Conclusion

NSSGA commends BTS for its modernization initiative. For the nation's highest-tonnage freight commodity, the priorities are clear: reliable and internally consistent estimates, more frequent and timely measurement, harmonized commodity definitions with USGS, finer product granularity and adoption of new administrative data sources, such as state DOT e-ticketing. NSSGA welcomes continued engagement and stands ready to support these efforts.

Sincerely,



Mira Lezell

Senior Vice President, Government & Regulatory Affairs
National Stone, Sand & Gravel Association

