



July 2nd, 2025

Don Onwiler
Executive Director
National Conference on Weights and Measures
9011 S 83rd Street
Lincoln, NE 68516
don.onwiler@ncwm.com

RE: Uniform Shipping Law Proposal – OTH 24.1

Dear Mr. Onwiler,

I am writing on behalf of XPO regarding the Uniform Shipping Law, OTH 24.1, drafted by the New Hampshire Division of Weights and Measures, which is currently under review by the Laws and Regulations Committee of the National Conference on Weights and Measures (NCWM).

XPO is a less-than-truckload (LTL) motor carrier that transports freight throughout the United States, Canada and Mexico.

Many shippers simply do not provide the information on their Bills of Lading as outlined under U.S.C. §80113 or the information required by the Uniform Bill of Lading forms and associated rules, Terms and Conditions published under the provisions of the National Motor Freight Classification, specifically NMFC Rules Items 250100-250160.

The minimal or inaccurate information provided often prevents us from properly classifying the freight or accurately pricing our transportation services without first obtaining additional details.

In practice, many shippers rely on the carrier to determine legally compliant descriptions, weights, and dimensions.

The XPO Weights and Inspections program has benefits for both XPO and shippers. It ensures regulations compliance with documentation, pricing and the safety of the motoring public.

The current governing agencies within the Surface Transportation Board, D.O.T., the F.M.C.S.A. and the Federal Code outline the responsibility for all parties for the movement of freight through carriers for the Less-Than-Truckload segment.

The recommended language as presented by New Hampshire and OTH 24.1, would potentially impose a substantial burden on the interstate operations of many carriers like XPO, without any showing that the mandated forms and procedures would benefit shippers in any way. It also has the potential to harm shippers who may have to present different documents depending upon the state application or enforcement.

Because OTH 24.1 would allow the states in which we operate to replace the already regulated federal forms and procedures with state-mandated forms and procedures, its adoption would substantially disrupt our operations without offering any meaningful benefits to the shipping public.

Based on the reasons identified and presented, we ask that NCWM table all action requested through OTH 24.1.

Thank you for your consideration of our views.

Very truly yours,

A handwritten signature in black ink that reads "Martin Ryan (HS)". The signature is written in a cursive style with a large, stylized "M" and "R".

Martin Ryan
Vice President, Pricing
XPO

Cc: Gene Robertson, NCWM Chairman
gene@mdac.ms.gov