

James Hannum
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January 3, 2024

Attn: Chair, Laws and Regulations Committee
National Conference on Weights and Measures (NCWM)
9011 S 83rd St
Lincoln, NE 68516

RE: Uniform Shipping Law Proposal

Dear Mr. Brooks,

I am writing to express my strong support for the Uniform Shipping Law proposal currently under review by the National Conference on Weights and Measures (NCWM). With first-hand knowledge of the accusations made in *United States v. Roadway Express, Inc.* (1:08-cv-00811) and over 20 years of experience Coordinating freight inspection programs, I recognize the urgent need for this proposal in establishing standardization in freight inspection policy across all states. The current system creates a cost disadvantage for carriers that charge based on the actual freight handled and for those shippers that are unaware that their carriers may not be transparent with their inspection activities. In both cases, they undermine honest businesses and destabilize market dynamics.

The NCWM has a long-standing history of excellence in setting and upholding measurement standards. This legacy of integrity and precision underscores the critical nature of addressing the current state of freight inspection activities, which may not always align with the high standards traditionally championed by the NCWM.

To address these concerns, I advocate for the establishment of a dedicated task force to investigate and propose solutions in the following key areas:

Defining Unlawful Behavior: Clearly outline what constitutes illegal practices in shipment inspection and measurement systems, distinguishing these from poor business practices, to ensure uniform understanding and application across jurisdictions.

Inspection Protocols: Develop advanced and quick methods for Weight and Measure field inspectors to identify illegal activity within carrier measurement systems, going beyond the current certification procedures that focus solely on device accuracy.

Impact on Interstate Commerce: Investigate how unlawful shipment measurement practices disrupt interstate commerce. This information is essential for formulating fair policies that ensure an even playing field for all parties involved.

Financial Implications: Evaluate the economic impact of illegal carrier inspection practices and the overall impact of legal carrier inspection activities, aiding the task group in understanding the motivations behind carrier actions.

Device Approval and Integrity: Advocate for a review of the approval process for weighing and measuring devices used for the reweighing of goods in the harsh "Less-than-Truckload" - LTL environment. The review would consider design features and suitability in order to prevent fraudulent device misuse.

I offer to volunteer my time and expertise to assist the task force, bringing practical insights from my extensive experience in freight inspection subject matter.

Your consideration of my input and the offer of assistance is highly valued. I am eager to contribute towards advancing fair and standardized freight inspection policies that work within current and firmly established transportation law.

Thank you for your attention to these critical matters.

Sincerely,

A handwritten signature in black ink that reads "James Hannum". The script is cursive and fluid, with the first letters of the first and last names being capitalized and prominent.

James Hannum