

October 1, 2026

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

Re: America's Great Corridors of Commerce; Request for Information [Docket No. [DOT-OST- 2026-3269](#)]

Dear Executive Director Farajian:

The Intelligent Transportation Society of America (ITS America) is grateful for the opportunity to provide input on the U.S. Department of Transportation's new initiative titled America's Great Corridors of Commerce (AGCC).

ITS America is the only national organization bringing together the private, public, and research sectors in intelligent transportation, convening experts across the industry who are fostering innovation to improve safety and efficiency in our transportation system. Our member organizations include state, regional, and local transportation and planning agencies, transit providers, major technology firms, auto manufacturers and suppliers, companies providing ITS products and services, data companies, research organizations, and academic institutions, all centered around delivering efficient, effective technology-forward transportation solutions.

The Build America Bureau's (Bureau) AGCC initiative is a promising example of how the public sector and private sector can come together to tackle some of our nation's most pressing infrastructure and transportation challenges. We welcome the forethought of initiating such a program and are encouraged by the focus on modernizing our infrastructure with the power of technology while improving transportation outcomes.

We agree with the stated key goal of the AGCC to "Provide the backbone needed by State DOTs and railroads to deploy technology projects, safety equipment, signs, Intelligent Transportation Systems (ITS), autonomous capabilities, Wi-Fi, and potentially electricity." Utility colocation can provide significant benefits to right-of-way (ROW) owners who are looking to deploy ITS solutions and upgrade their transportation digital infrastructure.

Please see the following comments below:

Overall Comments:

The AGCC represents a significant potential opportunity for State DOTs and other ROW owners to expand and upgrade their ITS capabilities. ITS infrastructure, particularly along highways, often relies on telecommunications and power infrastructure capacity for the integration of both equipment and data components. Traffic control devices, variable speed limits, dynamic message signs, radar, cameras, and other traffic management and safety tools require a continuous, reliable power source. Colocated fiber networks can also link roadside hardware directly with traffic management centers and the broader transportation network.

Because AGCC is expressly focused on corridors of commerce, the Bureau should also encourage designated corridors to evaluate ITS and digital infrastructure investments that improve freight movement, supply chain reliability, and access to major economic centers. These could include technologies that support truck parking information, work zone and queue warning, weigh-in-motion, incident detection and clearance, real-time traveler and freight information, port and intermodal access, and coordination with traffic management centers. Additionally, the Bureau should consider asking designated corridor plans to address communications access, sensing, edge computing, infrastructure security, operational coordination, information exchange, alongside traditional longitudinal utility infrastructure.

Lease revenues from the projects could fund transportation projects and long-term ITS operations and maintenance. This approach from the Bureau would closely align with the Department's overarching transportation digital infrastructure goals and would specifically complement the Secretary's recent surface transportation reauthorization recommendation to create a competitive grant program for transportation technologies.¹

Through this program, ITS America strongly encourages the Bureau and designated AGCC corridors to pursue projects that include ITS deployments and/or upgrades to transportation digital infrastructure that directly improve roadway safety, freight reliability, and system operations. These deployments could include wrong-way detection, queue and work zone warnings, connected work zones, emergency responder alerts, real-time incident detection, fiber optic sensing, and other technologies that help agencies prevent crashes, respond faster, and keep people and goods moving safely.

RFI Question #2. What can be done to minimize challenges and complexities or maximize opportunities for projects that cross jurisdictional borders?

The AGCC has an opportunity to provide a digital backbone for transportation across jurisdictional boundaries through fiber deployments that are connected to traffic management centers and other transportation operations. These types of connections should be strongly encouraged by the Bureau to AGCC designated corridors.

To further maximize opportunities for projects, any utility connections made in these designated

¹ https://www.artba.org/wp-content/uploads/2026/07/STR-Aspirations-Letter_July-22.pdf

corridors should look to extend beyond the ROW to the broader communities. There are many signalized intersections on the National Highway System that require connectivity and digital infrastructure – and this AGCC should include signalized intersections in its focus areas, alongside traditional interstate highways. This will benefit the wider transportation system, including ITS equipment owned and operated by non-State entities such as cities or counties that are often on arterial roads. This could also include fiber and utility connections to rail, ports, intermodal terminals, and other transportation networks in surrounding regions near these designated corridors, helping agencies improve freight reliability, manage incidents and work zones, reduce bottlenecks, and support more efficient goods movement across jurisdictions.

To maximize participation and promote fairness in the AGCC, the program should ask ROW owners and the proposed Corridor Managers to provide clear, objective, and transparent criteria when reviewing and selecting applicants. In addition, while applicants deploying infrastructure within the designated corridors should be encouraged to participate in the AGCC, choosing not to participate should not make it harder or more costly to access and deploy infrastructure within the corridors.

RFI Question #4. What forms of technical assistance or support would help ROW owners, utilities, and project developers more effectively deploy AGCC corridors?

ITS America supports enhanced federal coordination and technical assistance, including a single federal coordination lead and early sequencing of environmental, permitting, and regulatory requirements, as practical steps to reduce deployment barriers across complex multi-jurisdictional corridors. USDOT should provide dedicated support to state DOTs and other ROW owners who voluntarily participate in the program, while ensuring that ROW owners continue to maintain their primary authority over the ROW, with a clear distinction between federal and state authorities. This support would help corridor stakeholders focus on delivering the transportation digital infrastructure, communications networks, and operational technologies needed to improve reliability, safety, and economic competitiveness while preserving the primary transportation mission of the ROW.

ITS America recommends that the Build America Bureau and USDOT support ROW owners and corridor managers with technical support on ITS deployments. The newly created AGCC interagency task force could help these corridors find opportunities for deploying ITS solutions and identify all available federal funding sources for ITS projects and operational improvements. Specifically, USDOT could encourage corridor agreements that reserve a portion of revenue or capacity for transportation operations, cybersecurity, equipment refresh, software subscriptions, and data services. In addition, agreements with utilities, broadband providers, or other private-sector partners should preserve public-sector access to fiber strands, conduit, power, poles, communications capacity, data connections, and related infrastructure at reasonable terms. This would help ensure that ROW owners and transportation agencies can use privately enabled corridor investments to support transportation operations, safety, emergency response, and future ITS deployments.

The Bureau could help AGCC designees establish common national approach so that ITS equipment

and communications infrastructure deployed by different agencies and vendors can operate across jurisdictional boundaries – a key component for improved data interoperability and broader transportation digital infrastructure efforts. The Bureau could similarly consider recommending baseline cybersecurity requirements as part of corridor planning efforts to ensure broad alignment on critical infrastructure security strategies.

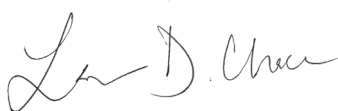
Additionally, the Bureau could help each designated corridor develop a digital infrastructure and ITS plan identifying existing and planned fiber, conduit, sensing and edge computing capabilities, communications facilities, power availability, roadside equipment locations, traffic management centers, V2X deployments, and other technology assets. The plan could identify opportunities to install shared infrastructure during utility construction rather than requiring transportation agencies to return later to retrofit the corridor. These plans could also identify corridor-specific safety use cases, including high-crash locations, work zones, freight bottlenecks, incident-prone segments, and emergency response needs, so that digital infrastructure investments are tied to measurable safety and operational outcomes.

The Bureau should also consider providing capacity-building support for ROW owners and local agencies that may not have dedicated technical, legal, or procurement staff to evaluate these types of opportunities or negotiate complex utility and telecommunications agreements. This support could include model agreement language, template scopes of work, sample technical specifications, procurement guidance, peer exchanges, dedicated staff, and access to subject-matter experts who can help agencies align AGCC corridor investments with ITS, safety, and operational needs.

Finally, the Bureau should encourage flexible procurement methods, including outcomes-based procurement for ITS solutions to encourage maximizing benefits to the ROW owners and road users.

ITS America applauds the Bureau's leadership in proposing such an initiative to use new methods to modernize and get the most out of our nation's infrastructure assets. Our organization stands ready to support the Bureau and USDOT by convening the public agencies, technology providers, infrastructure owners, researchers, stakeholders, and local governments that will be essential to making AGCC corridors successful. As the national association representing the intelligent transportation ecosystem, ITS America can help identify practical use cases, surface implementation barriers, share lessons from agencies and industry partners, and support the development of scalable approaches for integrating ITS and transportation digital infrastructure into designated corridors.

If you have any questions about the comments we have provided, please reach out to ITS America's Director of Policy and Government Affairs, Jim Broderick, at jbroderick@itsa.org.



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