

Mr. Rene Villalobos
Chairman
Department of Industrial Engineering
WP Carey School of Business
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Phoenix, Arizona

Dear Mr. Villalobos,

I have had my staff read your report to the Arizona Department of Transportation on the Logistics Capacity Study of the Guaymas-Tucson Corridor, and they found some serious factual errors that if not corrected may reflect on the overall credibility of your report. We also have some suggestions that you may wish to add to the report that will give ADOT readers an idea on how improvements will add to the capacity of the Mariposa port of entry.

First we need to clarify the inaccuracies in the report over the inspection of the northbound trains entering the DeConcini Port. The trains operate on a fixed schedule they don't just arrive at the port, as is the case with trucks. Customs and Border Protection, Union Pacific and FerroMex have agreed on the schedule. The number of trains is limited not by the operational hours of the Customs and Border Protection officers at DeConcini, but by the amount of freight available for the trains to haul. The current window of 9 a.m. to 5 p.m. is more than sufficient to process the 4 trains that cross daily. It is when the window is not utilized to its fullest that hours have to be extended to compensate for tardiness on the part of the rail roads. The railroads are on time only 3 to 5% of the time.

Our decision to expand the hours of operation is based on workload justification. For instance, in February of this year we added Sunday service when the railroads and some of their customers justified the workload for such service.

Please note that the 2-3 hour processing time noted in your report is due to railroad procedures and regulations of the Federal Railroad Administration. Not by CBP. On a regular day our CBP officers must wait at the border while the railroads go through the lengthy process of preparing the train to cross. Equipment and crews must be changed which may take 1-2 hours and CBP officers are simply waiting for the train to arrive.

When the train eventually crosses we use our x-ray to do the exam of the cars. Out of the average of 800 cars a week we will only ask to exam 3-5 cars a week, less than 1% of all cars. Usually we will release the entire train with no further exams required. The x-ray exam is transparent to the process in that it does not require the train to slow down or stop.

At the Rio Rico yard the train crew must do a complete brake check on the entire train, which will take 2-3 hours. The railroad also at times changes crews again between the border crossing UP crew and the crew that actually takes the train to Tucson and beyond.

If CBP has a container to examine we will use the brake check time to do our exam. Usually our exam is completed long before the brake check is finished. The report states that the CBP exams take 2-3 hours, as you can see this is patently untrue. We hope you will make the correction to your report.

In the same section the report states that the lack of equipment at Rio Rico to meet the CBP inspection requirements for a double stacked train. The report goes on to say that a possible solution would be to have the train proceed to Tucson for the inspection.

It is the responsibility of the importer to present their merchandise for inspection. Rarely would there be a need to completely move the container. Simply allowing the Officers to inspect the container by entering through the side doors should suffice. It is extremely rare when a container needs to be emptied of its merchandise. Most examinations are conducted in progressive stages; x-rayed, k-9, physical exam.

CBP would be interested in discussing areas of mutual concern such as performing any examination at a station in Tucson, Arizona. If the rail road wishes to propose building an examination station in Tucson we would be happy to discuss the proposal in detail.

We believe that two improvements to the Mariposa truck crossing that will have an enormous positive impact on the port's truck capacity should be included in the report. The first is the doubling the number of truck lanes from two to four lanes. Construction of the two new lanes is almost complete with the grand opening scheduled for August 15, 2006. One of the two new lanes will be a dedicated FAST (Free and Secure Trade) lane. This modern technology will allow prescreened trucks to proceed immediately through the border with only the bare minimum of delay.

Also next year all carriers and brokers will start using the electronic manifest system (E-Manifest). Truck manifests will be electronically sent to CBP for prescreening and targeting.

During preliminary tests of E-Manifests at Mariposa reduced the processing time at the primary booths from 3-4 minutes to less than 15 seconds.

Both of these improves will be working years before the first container ship arrives at Guaymas. You can understand why these two improvements will increase our truck capacity.

Again, thank you for allowing us to comment and assist you in providing the most accurate report to your readers. If you have any questions please contact Mr. Brian Sweeney of my staff.

Sincerely,

Ms. Donna de la Torre
Director, Filed Operations
Tucson, Arizona