



October 2, 2026

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

**RE: Docket No.: DOT-OST- 2026-3269 – America's Great Corridors of Commerce;
Request for Information**

Dear Dr. Farajian:

NATSO, Representing America’s Travel Centers and Truck Stops (“NATSO” or the “Association”)¹ appreciates the opportunity to provide these comments on the U.S. Department of Transportation’s (“DOT” or the “Agency”) Request for Information regarding the America’s Great Corridors of Commerce (“AGCC”) initiative.² Private travel centers and truck stops operate along the nation’s highway corridors and make significant investments in the infrastructure and services that support off-highway communities, the traveling public, and the commercial motor vehicle industry. NATSO’s members are some of the more than 77,000 businesses located within a quarter-mile of the Interstate at exit interchanges, marketing directly to highway travelers.³ These businesses employ more than two million people and contribute more than \$20 billion annually in state *and* local taxes.⁴

Our industry is well attuned to the infrastructure needs along the U.S. Interstate Highway System that the AGCC program is designed to address. NATSO’s members have a deep understanding of the processes undergirding private investment along the nation’s highway corridors. They also are hyper-sensitive to potential implications of policies affecting the use of highway rights-of-way. In our experience, well-intentioned individuals pursuing “public-private partnerships” are occasionally tempted to revisit restrictions on commercial activity within the right-of-way as a shortcut to attracting investment or addressing infrastructure needs, including electric vehicle (“EV”) charging and truck parking. That shortcut is a façade. If those longstanding

¹ NATSO is the pre-eminent trade association representing travel centers and other off-highway fuel retailers and businesses. NATSO currently represents approximately 5,000 travel plazas and truck stops nationwide, comprising both national chains and small, independent locations.

² U.S. Department of Transportation Office of the Under Secretary of Transportation for Policy: “America's Great Corridors of Commerce”; Request for Information 91 Fed. Reg. 53479 (August 18, 2026), *available at*: <https://www.federalregister.gov/documents/2026/08/18/2026-16776/americas-great-corridors-of-commerce-request-for-information>

³ *See generally*: Patrick O’Brien et al., The Impact of Commercial Rest Areas on Business Activity at Interstate Highway Interchanges (Blacksburg, VA: Virginia Tech, 2011).

⁴ *Id.*

restrictions were revisited, the value of off-highway real estate would plummet and the incentive for private investment along highway freight corridors would diminish substantially. The off-highway business community strongly opposes revisiting those restrictions.⁵

We are encouraged that DOT is not considering such approaches and are grateful for the Agency's interest and support in overcoming what we believe are solvable problems. NATSO's members are eager to share their perspective with the Agency as it considers the AGCC model and the proposed process for facilitating the colocation of utility infrastructure within transportation rights-of-way. Handled properly, travel centers and the entire off-highway business community stand to benefit from such colocation.

A central feature of the AGCC model is the use of a "Corridor Manager"⁶ to coordinate development and management of utility infrastructure within a designated corridor. Under DOT's proposed framework, a right-of-way owner may select a Corridor Manager to serve as the central project leader, with responsibilities that may include business development, design, permitting, financing, construction, operations, maintenance, and coordination with utilities seeking access to the corridor. NATSO supports using this framework to facilitate appropriate utility buildout, including electrical transmission, water transmission, and broadband projects. We appreciate that DOT recognizes that such Corridor Managers will have no authority to violate or in any way circumvent longstanding restrictions on commercial activity within the highway right-of-way.

NATSO agrees that the process for developing critical utility infrastructure along major transportation corridors can be made more efficient and predictable. Our members have substantial experience navigating state and local permitting and utility processes that accompany investments along and directly off of the Interstate system. Unnecessary delay and administrative complexity keep private capital on the sidelines.

The previous administration's implementation of the National Electric Vehicle Infrastructure ("NEVI") illustrates the inefficiencies that come from allowing state DOTs to pursue individual agendas in a vacuum without coordination with each other or support from the Agency. The various state DOTs moved at different paces and emphasized divergent priorities. It slowed deployment and made otherwise viable projects more difficult to advance.⁷

⁵ See, e.g., Letter from NATSO and other organizations to U.S. Department of Transportation, April 29, 2026, attached as Addendum A.

⁶ DOT defines a "Corridor Manager" as a private-sector partner that manages corridor responsibilities and delivers projects under the AGCC program. The term should not be conflated with "concessionaire," which generally refers to a private operator managing commercial activity at a rest area or service plaza where such activity is lawful. See U.S. Department of Transportation, "AGCC Structure and Roles," available at: <https://www.transportation.gov/grants/agcc/structure-roles>

⁷ A majority of NEVI awards made thus far have gone to charging installations at existing fuel retailers' sites. We support that outcome. The longstanding prohibition on commercial activity at Interstate rest areas was an important factor in attracting private investment for EV charging under NEVI. Had states been permitted to install commercial EV charging at Interstate rest areas, the incentive for private businesses to invest in off-highway charging infrastructure would have been substantially diminished.

Truck parking providers often confront analogous obstacles that the AGCC model could help remedy.⁸ Securing permits can require extensive traffic studies and environmental reviews. Zoning approvals may require variances or rezoning efforts, particularly in areas where truck-related uses are disfavored. Approvals can also be conditioned on costly off-site improvements, such as intersection upgrades or interchange modifications. In both contexts, bureaucratic inertia and inconsistent implementation make otherwise viable investments more difficult to advance.

The challenges our members have encountered in buildout are not unique to our industry. Similar barriers arise whenever infrastructure projects cross jurisdictional boundaries or require coordination among transportation agencies, utilities, permitting authorities, and private investors, including in the development of utility infrastructure along major highway corridors. The AGCC initiative therefore presents a meaningful opportunity for DOT to improve coordination and create a more predictable environment for private investment along the nation's most important freight and transportation corridors. NATSO supports that objective and looks forward to helping the Agency identify practical ways to achieve it.

Expanding utility infrastructure along major highway corridors can also reduce the cost of developing and operating the businesses that serve those corridors. This should provide NATSO members with greater access to reliable utility capacity and lower the cost of building new facilities and deploying additional services.

Finally, NATSO supports the AGCC program's goal of encouraging additional manufacturing, distribution, and other commercial development along major transportation corridors. New industrial facilities generate economic activity well beyond the facility itself. For off-highway businesses, that activity translates directly into greater demand for the goods and services they sell.

NATSO appreciates the opportunity to file these comments and looks forward to continuing to work with the Department of Transportation on these important issues. Please do not hesitate to contact us if we may be helpful in any way.

Sincerely,

NATSO, Representing America's Travel Centers and Truck Stops

⁸ NATSO supported the truck parking provisions included in the highway reauthorization legislation recently reported out of the House Transportation & Infrastructure Committee (Build America 250 Act). That bill would establish a dedicated truck parking grant based on the framework established in legislation introduced by Rep. Mike Bost (R-IL). Safe and adequate truck parking is a foundational element of highway safety and freight efficiency. NATSO members provide more than 90 percent of the nation's truck parking capacity. The Build America 250 Act rightly preserves the longstanding federal prohibition on commercial activities at Interstate rest areas. That policy is essential to incentivizing private sector investment in off-highway truck parking spaces.



April 29, 2026

The Honorable Sean Duffy
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Duffy:

The below signed organizations – representing hundreds of thousands of mostly small businesses, as well as American cities and localities and blind entrepreneurs – urge the U.S. Department of Transportation to uphold the longstanding ban on commercializing Interstate rest areas as you consider policies and programs to expand truck parking.

We urge you to reject any proposal to carve out exceptions to the commercialization ban, including to create truck parking. The private sector's ability to operate in a competitive and robust marketplace ensures its ability to provide jobs, generate critical tax revenues, and further enhance investments in alternative fuels.

When Congress created the Interstate Highway System in 1956, Congress and community leaders feared that local businesses, jobs, and tax bases would shrink as motorists and truck drivers bypassed their cities and towns. For this reason, Congress prohibited new Interstate System rest areas from offering commercial services, such as food and convenience items. Since then, businesses have clustered near the Interstates at the interchanges to provide these services to Interstate travelers. Given how many businesses are located off of Interstate exits, it is one of the most competitive business environments in the country.

Commercializing rest areas would eliminate jobs, while at the same time undercutting a number of important policy priorities that affect various sectors of the economy.

- **Commercialized Rest Areas Will Hurt Private Businesses**

While at first glance rest area commercialization seems like an easy and convenient way to generate revenue, the fact is it does not generate any *new* infrastructure or tax revenue; instead, it simply *transfers* sales away from the current competitive environment off highway exits to state coffers and the business contractor that pays the largest amount to rent the location on the shoulder of the highway. It would jeopardize private off-highway businesses, including many small businesses that for the last 60 years have operated under the current law and invested in and established locations at the highway exits based on that law. Due to their advantageous locations, state-owned commercial rest areas would establish virtual monopolies on the sale of services to highway travelers. Commercial activity will be diverted from off-highway communities to on-Interstate locations, redirecting tax revenue from localities to state capitals.

When the government competes with private business in this way, it results in a monopoly, undermining the free market and raising prices for consumers.

- **Commercialized Rest Areas Threaten Cities and Towns**

In many rural communities located near Interstates, gas stations, restaurants, convenience stores, truck stops, and hotels represent the largest local taxpayers, contributing more than \$22.5 billion in state and local taxes. These funds help support schools, police and fire departments, and other vital public services.

Commercializing rest areas would destroy the property tax base of local governments and put out of business many companies that have invested in creating a business model based on access to the Interstate. The damage to thousands of local businesses means the cities and towns that rely on those businesses for tax revenues will be further challenged to make up a substantial budgetary shortfall.

- **Commercialized Rest Areas Hurt Consumers**

Prices are significantly higher at existing state-owned commercial rest areas than off-highway competitors because the state, contractor, and leasing vendor all take a piece of product sales. Additionally, the lack of viable competition will eliminate any downward pressure on prices. This stands in stark contrast to exit-based businesses, which operate in one of the most competitive environments in the United States, often competing with multiple other entities in close proximity to one another.

- **Commercialized Rest Areas Threaten the Livelihood of Blind Entrepreneurs**

Businesses that are owned by blind entrepreneurs currently enjoy a priority for installing and operating vending machines at Interstate rest areas. Many blind business owners throughout the country rely on this opportunity to earn a living, support their families, and realize the American dream. If commercial rest areas are allowed, use of these vending machines could be expected to fall precipitously, resulting in thousands of blind entrepreneurs being put out of work virtually overnight.

- **Commercial Rest Areas Constrict Truck Parking Capacity**

Commercial rest areas diminish truck parking capacity, threatening the objective of increasing truck parking availability nationwide. Private truck stops and travel plazas located at the Interstate exits provide 90 percent of all truck parking in the United States, mostly free of charge, and need a healthy business climate to operate and expand. When states are permitted to provide commercial services at their rest areas, private businesses either go out of business or, at the least, will not invest in expanded facilities. This will result in a net loss in truck parking capacity.

In conclusion, commercializing Interstate rest areas would create far more problems than it will solve. States and local communities will suffer when exit-based businesses and the jobs they support have to cut workers and potentially close; hard-working business owners will lose out on a significant portion of their customer bases; blind entrepreneurs will be out of work; and truck drivers will have a harder time finding a safe place to rest.

We strongly urge you to oppose efforts to commercialize Interstate rest areas.

Sincerely,

NATSO, Representing America's Travel Centers and Truck Stops

Asian American Hotel Owners Association

Energy Marketers of America

Franchise Business Services

International Franchise Association

National Association of Convenience Stores

National Automatic Merchandising Association

National Federation of the Blind

National Franchisee Association

National League of Cities

National Restaurant Association

National Retail Federation

National Tank Truck Carriers

SIGMA: America's Leading Fuel Marketers

The Transport Project