

September 30, 2026

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

*Re: America's Great Corridors of Commerce (AGCC) Request for Information,
Docket No. DOT-OST-2026-3269*

Dear Secretary Duffy:

The Alliance for American Manufacturing (AAM) appreciates the opportunity to comment on the Department of Transportation's Request for Information regarding the proposed America's Great Corridors of Commerce (AGCC) initiative. AAM is a non-partisan partnership established by leading domestic manufacturers and the United Steelworkers. We support policies that strengthen American manufacturing, secure domestic supply chains, and create and sustain good-paying manufacturing jobs in the United States.

AAM supports federal efforts to modernize the nation's infrastructure using U.S.-produced iron and steel, construction materials, and manufactured products. As the Department evaluates the potential AGCC initiative, it should ensure that the program advances not only infrastructure deployment goals, but also the longstanding bipartisan objective of strengthening American manufacturing and domestic supply chains.

The AGCC proposal contemplates the development of significant utility infrastructure within transportation rights-of-way, including electric transmission, communications infrastructure, pipelines, and other facilities. These projects would create substantial demand for U.S.-produced iron, steel, aluminum, electrical equipment, communications equipment, construction materials, and manufactured products. As a result, DOT and the administration should view AGCC not merely as an infrastructure initiative, but also as a significant opportunity to support domestic manufacturing.

For decades, administrations of both parties have recognized that infrastructure policy and manufacturing policy are inextricably linked. Infrastructure spending creates demand for industrial materials and manufactured goods. When that demand is met by domestic producers, the benefits of infrastructure investment extend beyond the completed project to include expanded production, investment, and employment throughout the nation's industrial base. This principle is embodied in the Build America, Buy America Act (BABA), which Congress enacted in 2021 to ensure that the iron and steel, construction materials, and manufactured products used in federally assisted infrastructure projects are produced in the United States. BABA reflects a bipartisan judgment that federal infrastructure investments should strengthen American manufacturing and reduce dependence on foreign supply chains. The law recognizes that public investment should support domestic production whenever possible and that taxpayers should receive the full economic benefits associated with infrastructure spending.

The Department should therefore carefully scrutinize language in the RFI suggesting that utility infrastructure developed through AGCC corridors could be financed through structures that may avoid the application of certain federal requirements. While project sponsors may utilize a variety of financing mechanisms, AGCC designation should not become a vehicle for the circumvention of Buy America and BABA requirements or otherwise incentivize project sponsors to structure investments in ways that reduce the use of U.S.-produced materials and manufactured products.

DOT's own precedent demonstrates that utility infrastructure associated with federally assisted transportation projects should not be treated as categorically separate from the transportation project itself for purposes of domestic content compliance. Following enactment of Section 1518 of MAP-21, Congress clarified that FHWA's Buy America requirements apply to all contracts eligible for assistance within the scope of a project's National Environmental Policy Act (NEPA) determination, regardless of the funding source of individual project elements if at least one contract associated with the project receives Federal-aid highway funding. FHWA subsequently determined that utility relocation work falling within the scope of an eligible highway project is subject to Buy America requirements, including utility work undertaken pursuant to utility relocation agreements. This precedent recognizes that utility infrastructure can be an integral component of a federally assisted transportation project and should not be excluded from domestic sourcing requirements merely because a different financing structure is used. As DOT considers the AGCC initiative, it should apply this same principle and ensure that utility infrastructure developed within federally supported transportation corridors does not become a loophole for avoiding Buy America or BABA compliance.

President Trump's Executive Order 13788, *Buy American and Hire American*, seeks to maximize goods, products, and materials produced in the United States through federal procurements and federal financial assistance awards. President Trump subsequently issued Executive Order 13858, *Strengthening Buy American Preferences for Infrastructure Projects*, specifically directing federal agencies to strengthen domestic preference policies applicable to infrastructure projects receiving federal financial assistance. Together, those executive orders reflect a clear and longstanding commitment to ensuring that federally supported infrastructure development maximizes the use of American-made materials and supports U.S. workers and manufacturers.

The Department should make clear that AGCC is intended to operate consistently with these longstanding policy objectives. To the extent federal financial assistance, federal credit programs, federal permits, federal approvals, federal technical assistance, or other federal support are associated with designated corridors, the Department should ensure full compliance with applicable domestic content requirements. The Department should further clarify that AGCC designation will not be used to create financing or ownership structures whose primary purpose or effect is to circumvent domestic sourcing requirements that would otherwise apply to federally supported infrastructure projects.

The Department should take additional steps to ensure that all AGCC participants, including private corridor managers and utility developers, maximize the use of U.S.-produced iron and steel, manufactured products, and construction materials even where such requirements may not be legally mandated. The Department should incorporate domestic manufacturing considerations into any corridor designation process and encourage applicants to describe how proposed projects will support American manufacturing and domestic supply chains, including the anticipated sourcing of steel, electrical equipment, communications equipment, and other applicable products. Such commitments should be viewed favorably when evaluating competing corridor proposals.

To monitor these outcomes, as a condition of AGCC participation, designated corridor sponsors should be subject to robust transparency and disclosure requirements identifying the country of origin of iron and steel, construction materials, manufactured products, and key components incorporated into corridor projects. These disclosures would provide policymakers, taxpayers, and the public with a clear understanding of whether AGCC is advancing the administration's objective of strengthening American manufacturing, supporting domestic supply chains, reducing reliance on foreign sources, and ensuring accountability for domestic sourcing commitments made during the designation process.

The Department should also ensure that AGCC generates clear public benefits commensurate with the value of access provided to public transportation rights-of-way. Although some individual facilities may be financed or operated through private leasing and concession arrangements, AGCC would constitute a federally established and supported program that provides selected projects with federal designation, technical assistance, interagency coordination, permitting support, and potential access to federal financing tools. The use of private financing or recurring lease payments should not allow participating entities to avoid otherwise applicable federal programmatic requirements or the public interest safeguards that ordinarily accompany federally supported infrastructure development. Corridor sponsors should therefore disclose the ownership and control structures, the terms and duration of leases or concessions, the allocation of recurring revenues, and the extent to which those revenues are reinvested in transportation infrastructure, utility infrastructure, or other defined public purposes. DOT should also establish enforceable standards to ensure that the long-term economic value generated through the use of public rights-of-way provides demonstrable public benefits and does not accrue disproportionately to private corridor managers or utility developers.

Furthermore, the Department should establish strong Foreign Entity of Concern (FEOC) restrictions as a condition of AGCC participation. AGCC should not create new opportunities for entities affiliated with foreign adversaries, including the People's Republic of China, to participate in the development, financing, operation, or supply chains of critical U.S. infrastructure. The Department should also ensure that iron and steel, construction materials, manufactured products, and critical components incorporated into AGCC-designated corridors are not sourced from entities owned, controlled, or influenced by a FEOC. Such restrictions should apply both to direct project participants and to upstream suppliers whose products are incorporated into AGCC-supported infrastructure. America's efforts to strengthen domestic manufacturing and supply chain resilience will be undermined if AGCC projects become dependent on materials, products, or components supplied by strategic competitors.

America's manufacturing base remains essential to the nation's economic strength, energy security, and national security. Infrastructure initiatives of the scale contemplated by AGCC should reinforce federal efforts to rebuild domestic industrial capacity. The Department should ensure that any AGCC initiative is fully aligned with Build America, Buy America requirements, President Trump's Executive Orders 13788 and 13858, and other longstanding federal policies designed to strengthen American manufacturing, secure domestic supply chains, and reduce dependence on foreign adversaries.

Thank you for the opportunity to provide these comments.

Alliance for American Manufacturing