



June 5, 2015

Major General Susan A. Davidson
Commander, Military Surface Deployment and Distribution Command
1 Soldier Way
Scott AFB, IL 62225

MG Sue Davidson:

The International Association of Movers (IAM) requests that you consider an immediate delay of the Surface Deployment and Distribution Command's personal property Intrastate Requalification initiative.

Beyond the fact that the household goods industry has not been afforded any opportunity to discuss the merits of requalifying approved Intrastate participants in the Defense Personal Property Program (DP3), the timing for this initiative could not have been worse. As you well know we are in the middle of the busiest part of the moving season. Transportation Services Providers are focused on one thing....providing high quality PCS moves to the men and women of the U.S. military. At this critical juncture in the moving season to ask the industry to redirect their efforts away from their core mission is counterproductive.

We also question under what authority SDDC Personal Property can even hold this requalification process. There is no requirement for such an initiative called for in any of the guiding documents, e.g. the Defense Transportation Regulations (DTR), the 400NG tariff, the Qualifications Document (PAM 55-4). This substantive change is arbitrary and capricious, and at the very least, IAM believes that it calls for a comment period via the Federal Register. Transportation Service Providers stand to lose all or a portion of their approval to engage in DOD business. It is critical that they be afforded an opportunity to comment on this process.

Transportation Service Providers are unsure as to what SDDC's end goal is for this process. Is it just to reduce the number of TSPs in a given state? Is it to reduce some perceived administrative burden on SDDC staff? Is there some other long range goal that will filter over into the other DP3 Markets?

The timing for the requalification process is ill-advised, it is unclear from what authority SDDC draws the power to hold such a process, industry has had no ability to truly dialog with SDDC on the merits of the process, the evaluation criteria is unclear and there are no stated goals for the requalification process.

We respectfully request that SDDC step back from the process. Delay the requalification implementation and take some time to work with industry and reevaluate why this process is necessary. Why is the Command in such a hurry to eliminate capacity from the Defense Personal Property Program when capacity is the issue DOD faces year after year?

Sincerely,

A handwritten signature in black ink that reads "Charles L. White". The signature is written in a cursive, flowing style.

Charles L. White, CAE, M.Ed.
Senior Vice President
International Association of Movers

CC:

William H. Budden
Lt Col Michael W. Erhardt

