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Brian Bourke, Vice President, Marketing, SEKO Logistics  
630-919-4966 · Brian.Bourke@sekologistics.com

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## 46 TAMMY FLANDERS HETRICK

Senior Trade Advisor  
A.N. Deringer, Inc.

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Chief Strategy Officer  
Capacity, LLC

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President  
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Managing Director  
Univeristy of Washington

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President  
Freight Management, Inc.



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Tammy Flanders Hetrick, Senior Trade Advisor, A.N. Deringer, Inc.  
888-612-6239 • marketing@anderinger.com

## Internal Audits: The Cornerstone of Compliance

Internal audits are the cornerstone of your compliance program. Monitoring your performance, and that of your Customs broker, is the only way to determine if the policies and procedures you've put in place are effective.

You may be asking yourself: How often do we do this? How do we do this? Who has time for this? Good questions! Let's address them one by one:

### How Often Do We Do This?

- Weekly Automated Commercial Environment (ACE) Reviews
- Quarterly Post-Entry Reviews

### How Do We Do This?

I recommend running your ACE report on a weekly basis to review ongoing activity at a high level. You are looking for:

- Unfamiliar HTS numbers
- New suppliers
- New countries of origin

You're looking for changes in sourcing patterns—new suppliers, products, or origins that have not been run by you for input prior to import. If/when you see something unusual, pull the entry(ies) and audit these transactions in detail. These unknowns have already created risk in your supply chain; now is the time to mitigate that risk.

Quarterly Post-Entry Reviews are the crux of your internal audit program. Establish a sample set of entries for a four-way-match exercise, a process that ensures the entered value/product matches the commercial invoice, purchase order, payment, and receiving records. Any discrepancies among these factors must be understood and explainable. How big is the sample? How do you choose which entries? Your business model and landscape determine your sample. My general approach is a mix of random and judgmental

sampling. I make sure to pull entries across a good range of suppliers, products, and origins. If I've had a problem with a certain supplier, specific documentation, classifications, etc., I pull samples of these transactions every quarter until I'm satisfied the issue has been resolved.

Once the sample is established, it's time to use your Post-Entry Review spreadsheet, which contains key elements of the commercial invoice, Entry Summary (7501), accounts payable records of billing invoices and payments for each entry, and receiving records. Your goal is to ensure the classifications, values, and quantities declared to US Customs and Border Protection (CBP) match what you actually received in your inventory and paid your suppliers. Any discrepancies are assessed in terms of materiality to determine if post-summary corrections are in order and/or training/penalties to suppliers or others are required. You also need to determine if the errors are one-offs or systemic, which may require further auditing of specific transactions. Performing these audits quarterly ensures no issue gets out of control.

### Who Has Time For This?

These audits take time, and it is time well-spent. It is also a regulatory requirement to demonstrate reasonable care and, therefore, not optional. If you simply don't have resources to devote to this effort, I suggest you contact your Customs broker to assist you. Hiring a quality Customs broker may be the most cost-effective way to execute these audits.

### Discipline Matters

Internal audits may seem daunting, but they are an integral part of your Customs compliance program. Developing this discipline will help you uncover risks in your supply chain, and, quite often, surface opportunities hidden in the patterns of your import activities to improve overall supply chain performance.



Thom Campbell, Chief Strategy Officer, Capacity, LLC  
 732-348-7224 • inboundlog@capacityllc.com

## Managing Warehousing Requirements During Peak Periods (Without Committing to Long-term Contracts)

**M**anaging peak period shipment volume is a structural challenge in the U.S. economy. Those preoccupied with executing order fulfillment services spend much of the year thinking about and planning for it. The surge is a three- to four-month peak in first inbound, and then outbound shipments, with overlap. Shipments to retailers come first, followed by a huge spike in shipments directly to consumers. Industries such as toys can see as much as 80 percent or more of their sales in a very short timeframe.

This is primarily an issue for consumer products, because other verticals do not have such spikes in volume during peak season; demand for baby products and medical devices, for example, tends to be relatively flat throughout the year while demand for gift items spikes strongly toward year end.

Warehouses can use a number of techniques to maintain service level agreements (SLAs) – the “guaranteed” turn-around time for an order to go out – during peak demand periods. These techniques include:

**1. Manage laborers carefully.** From Labor Day to Christmas Eve, ask employees to avoid vacation time, except in areas such as sales and finance. Make additional use of temporary labor, but rely more on additional shifts of previously trained workers. Feather in additional day shifts and night shifts as needed. Start well before peak season, in order to be ready when it comes. Shake out any issues with training or attendance before crunch time. Cross train supervisors and other employees on different tasks, facilities and shifts. Add flexibility and scalability wherever possible, but always at the lowest possible cost.

**2. Incentivize staff.** When smaller, rely on a core team. If needed, use overtime to help address the challenges of volume spikes, which routinely are between five and 10 times the norm and require additional hands on deck. Hourly workers are incented by the prospect of overtime pay, but the cost curve goes up more steeply than the productivity curve. The latter goes down as steeply, if not more so. Good service is highly correlated to happy, well-rested workers, and vice versa. Provide a career path for all workers, whatever

level they start at, and offer benefits and pay for performance along that path.

**3. Set expectations.** Plan with clients who have significant historical volume spikes, and be realistic about the ability to maintain SLAs during peak. That may mean running an extra day shift right after Black Friday, working the weekend, whatever it takes. Work Sunday afternoon shifts to address the weekly spike and accumulated volume of the extra online shopping days over the weekend. Get ready to attack the larger seasonal volume spikes, and even the smaller ones – it’s like training for the really big ones.

**4. Watch out for carrier issues.** Ultimately, all supply chain systems are physical, and subject to physical constraints. The idea that parcel carriers can infinitely multiply their human and hard assets for 22 days of the year is not realistic; there will be a cap to the extra drivers, equipment and sorting capabilities. This is experienced most acutely in ground service delays during those absolute peak days. Carriers can also get hurt if they over-staff and prepare for more volume than they get. All carriers are more incented to not over-staff and over-equip for the volumes because that negatively impacts profits.

**5. Technology improves throughput.** There is no denying that the move toward ever more sophisticated IT solutions can increase productivity dramatically. But that is impossible without disciplined, expert implementation. Many software implementations fail. Hardware is fickle. Be prepared and expert at troubleshooting, duct tape, spit and vinegar.

The opportunity to manage a highly complex problem requires expert deployment of people, places and things to lead through challenging and demanding times. It is not for everyone, but for those who are up for and excited by the challenge, there is nothing better. Every iteration of the improvement cycle looks different, depending on the unique needs of the organization and how quickly it can be expanded to other areas of the business. That process runs a lot more smoothly when there is a clear mission statement for a peak demand improvement program and a focused plan to roll it out.

Capacity offers expert warehousing, assembly, order fulfillment services and technology solutions to businesses nationwide. Capacity provides a bicoastal fulfillment solution, from three facilities in North Brunswick, NJ, and a fourth in City of Industry, CA. Capacity is cGMP certified, operates FDA registered facilities, and is NJ and CA State Board of Health approved food grade. Capacity LLC provides domestic and international distribution to companies of all sizes, from startups to household name brands that ship around the world. For more information, go to [www.capacityllc.com](http://www.capacityllc.com).



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Eric Meyer, Executive Vice President, Operations, Landstar Transportation Logistics  
877-696-4507 • solutions@landstar.com

## Securing Capacity for Freight Moving In and Out of Mexico

Shipping freight across the U.S.-Mexico border is a complex operation and requires a trusted, reliable logistics provider. With 80 percent of Mexico's exports currently coming to the U.S., and with so many companies having their own Mexican entities for building or supplying components, the overall supply chain between the U.S. and Mexico has become very integrated, making cross-border trade a significant part of the logistics market for both countries.

For shippers, importing to and exporting from Mexico can present a unique set of challenges. One of the toughest challenges that cross-border shippers in today's market face is securing high-quality capacity on both sides of the U.S.-Mexico border.

### Managing the Imbalance

Cross-border capacity includes not only trucks, but also the ability to manage trailer capacity. The latter is important due to the trade imbalances that occur between the U.S. and Mexico markets, namely that there are more loads coming into the U.S. than going out.

There are, for instance, several states within Mexico that have outbound freight to the U.S. but very few inbound shipments coming back. Shippers attempting cross-border transportation on their own have to know how to manage the imbalances, and how to figure out solutions that get the trucks to come back to the border. One way to tackle this is to work with a transportation provider with experience in handling this imbalance.

### Alternate Solutions

As capacity continues to tighten, or as there's less capacity available in the marketplace, shippers are more apt to find other solutions to get their freight picked up and delivered. If your shipment doesn't require a full trailer, less-than-truckload (LTL) consolidation can serve as a cost-effective solution to cross-border freight challenges when time is not critical.

The company a shipper chooses to work with should offer transloading, or transferring a shipment from one truck to another, and shipment consolidation capabilities.

Transloading consolidates the LTL freight moving south freeing up truckload capacity to handle more deconsolidated shipments moving north. This makes capacity more accessible by leveling the imbalance between the truck, the trailer, and the load.

Additionally, a qualified cross-border carrier should be able to provide a shipper with alternate modes of transportation if a truck is not the best solution for your freight.

### Benefits of Facilities with Cross-Docks

Transportation management providers can use their facilities to balance the needs of the customer with the shifts in available capacity to provide the best solution. These balance shifts, which can occur daily, must be managed accordingly to maximize each and every available capacity unit.

Cross-dock facilities allow for increased trailer asset and capacity utilization, which provides customers more options to get their products safely through the border and to the ultimate destination.

### Choosing One Provider

#### Capable of Handling Your Cross-Border Logistics

As U.S. companies expand their presence in Mexico or increase trade with companies in Mexico, the need for reliable logistics providers that can successfully navigate the intricacies of such freight movements will only increase. Working with one provider that can handle the moves from origin to destination, or selecting providers on a piecemeal basis to manage certain aspects of a move, depends largely on the shipper's current infrastructure, its own internal expertise, and knowledge of the market.

If you have employees who can manage multiple layers of the process, then you may be able to 'fill in' as needed with providers that specialize in certain aspects of the cross-border supply chain. A growing number of shippers are outsourcing all of their logistics requirements—from pickup to customs brokerage to delivery—and focusing instead on their core businesses. Shippers should work with a transportation provider that can offer a one-bill solution for all types of cargo crossing the U.S.-Mexico border.



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Bill Goodgion, President, Ascent Global Logistics  
331-903-4274 • bgoodgion@ascentgl.com

## Is Your 3PL Provider Causing You Headaches? Here is What to Look for in a 3PL Partnership

It's 2018, which means that shippers are looking for 3PLs to perform at higher levels than ever before. Because of various market conditions such as the driver shortage, record freight volumes, a volatile trade environment, and increasingly complex retailer delivery requirements, many 3PLs are only offering customers enhanced technology.

While technological innovation is necessary, there is a crucial component that many 3PLs too often overlook when managing customers' supply chains: the human interactions involved in supply chain work. Whether it is an operations specialist, dock worker, international trade expert, retail logistics specialist or sales representative, those are the people that have the power to make logistics miracles happen.

For shippers, importers, manufacturers, and retail suppliers to get the most out of their relationships with a 3PL provider, look for one that (1) treats its team members with dignity and respect and (2) goes above and beyond for its customers and fellow team members.

### What are Some Key Things to Look for?

Every great company begins with setting an example at the top. Leadership must first establish an ethical framework that will allow for its people to come together, share ideas, and work towards a common goal. This will allow shippers, importers, manufacturers, and retail suppliers to receive the best value from their 3PL partner. In turn, this will allow the 3PL partner to establish the proper framework for delivering quality customer service.

Shippers should make sure the 3PL company's leadership works to ensure its team members are in an environment

that fosters collaboration and innovation. Some of the best companies provide opportunities to ensure that its people can share expertise and continuously improve, such as lunch and learns and ongoing educational opportunities.

In addition, some of the best companies also make sure that they recognize their team members' hard work and dedication through performance recognition programs, such as performance-based bonuses and top-performer awards.

By taking a closer look at a 3PL's internal actions to promote team unity, shippers can make sure that they are working with an honest, respectful, and team-focused organization.

Once a 3PL is internally unified, different departments should be able to effectively work together to help each other and their customers. When working with shippers, the best 3PLs can (1) identify additional areas of opportunity in a customer's supply chain and (2) work internally to help the customer meet his or her needs entirely within their organization.

While technology is very helpful in executing specific tasks, technology alone cannot replace quality human interaction. At the end of the day, shippers should make sure that their 3PL provider is working with them in an efficient, friendly, and attentive manner.

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Ascent Global Logistics is a full-service global logistics partner focused on providing clients with Domestic Freight Management, International Freight Forwarding and Retail Consolidation solutions to improve their supply chain efficiency. Our team is focused on going above and beyond to use innovative technology, customized solutions and highly individualized service to optimize clients' logistics performance.



Julie Thuston, AVP, Operations and Account Management, Unyson, a Hub Group company  
 314-819-6300 • info@unyson.com

## How an End-to-End Strategy Can Help You Overcome the Capacity Crunch

**T**he 2018 capacity crunch has created what many consider one of the most challenging markets we've ever seen. Today's shrinking driver pool faces an upcoming wave of retirements and disinterested millennials, resulting in constrained truck availability. The ELD mandate has also impacted capacity, with restrictions on the amount of hours driven in a day, leading to a reduction in productivity.

Meanwhile, demand continues to grow. The improving economy, steady growth of e-commerce, and an increase in imports and exports have contributed to rising shipments. As a result, drivers have newfound negotiating power, pushing carriers to raise compensation packages and introduce benefits to better retain or attract them.

While carriers are experiencing the immediate impact of a constrained driver pool, the industry as a whole is bound to feel further effects resonate throughout supply networks, with costs across the board projected to see striking increases. Shippers will not be immune from these far-reaching effects. Pivoting from structuring supply chains around segmented solutions to an end-to-end approach is an excellent way to deal with this new market landscape.

An effective end-to-end strategy can improve supply network flexibility, ensuring you're able to make the most of your resources while optimizing your ability to react to unexpected market variables. With that in mind, here are five tips for refocusing your solution design with an end-to-end mindset:

**1. Become a shipper of choice:** Because today's drivers and carriers have more freedom than ever to decide which business they accept, shippers of choice have a clear advantage. That's why those hoping to partner with these newly selective carriers need to strive to provide the most value for them and their drivers. This can include streamlining arrival and departure times or providing flexible appointment windows to optimize delivery schedules. A good shipper of choice should also build a close relationship with high-volume carriers to help balance networks, which ultimately improves capacity access.

**2. Streamline empty container flow:** Working with carriers on best practices for eliminating deadhead and downtime

should always be a priority. Utilizing an effective reverse logistics process, introducing a drop and hook program, optimizing shipment loading processes—all are great ways to eliminate unnecessary costs and inefficiencies. Ensuring goods move as seamlessly as possible with minimum downtime will also reduce equipment expenses while making optimal use of a driver's time.

**3. Strategic network selection:** Optimizing a supply network to ensure shipments take the most efficient route available is paramount to reducing costs and transit times. The successful network selection strategy starts with proper intelligence gathering, leveraging visibility tools, network research and route analysis to build an in-depth look at the supply chain as a whole.

**4. Establish an effective dialogue:** Setting up a recurring meeting with a transportation provider can open up a dialogue about how to drive value across a supply chain. This dialogue should also help you understand what market factors are shaping prices and capacity, giving you a better sense of potential pitfalls and pain points as they're developing.

**5. Strive for continuous improvement:** Striving for continuous improvement is perhaps the most important underlying component of an effective end-to-end strategy. Once you've established an effective dialogue, you'll naturally discover opportunities to develop these strategies. As your end-to-end plan evolves, pain points and growth areas will reveal themselves through analysis and discussion. Ideally, you'll be able to work with your transportation provider to leverage an existing network footprint and solutions portfolio to enhance network synergies, reduce wasted spend, and eliminate various inefficiencies.

The capacity crunch has steadily grown to become a major market influencer, creating a ripple effect that will drive up costs across the industry. It's vital for shippers to pivot towards strategies designed to produce as much value as possible throughout their supply chain. End-to-end solutions can strengthen existing efficiencies while eliminating wasteful costs, on top of making optimal use of the available driver pool. Ultimately, they're an excellent way to prepare your business for the new shape of the market.



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Brian Bourke, Vice President, Marketing, SEKO Logistics  
630-919-4966 • Brian.Bourke@sekologistics.com

## Thinking Beyond Home Delivery

Consumer expectations are becoming increasingly demanding, and matching supply to demand is crucial for any successful supply chain. Speed is where it's at—if you are not moving forward, you are moving backward. As consumers become increasingly savvy online, companies are quickly learning the importance of being at the forefront of change. Providing consumers with all the information up front, including delivery costs, duty costs and delivery dates (rather than service level) can equate to lower abandonment rates, higher sales, and success in the retail landscape.

### How to evolve with e-commerce

Understanding what the consumer wants may just make or break your sale. Consumers want choice. Choice empowers.

"40% of shoppers are willing to pay for next day delivery and 22% would pay for delivery within a two-hour slot." (Survey by Trimble, referenced by Econsultancy)

In analyzing the buying trends of the evolving consumer, retailers have found incredible importance in the offering of convenience. Consumers want options that are built around their lifestyle, therefore, providing more information increases awareness and portrays flexibility. Retailers looking to understand what the consumer wants may discover the hard truth that they need to upgrade their logistics offering but, that shift in focus will likely lead to a more positive consumer outlook. And, if the perfect solution doesn't exist, call a team meeting to brainstorm and see if you can create one!

### Questions to ask yourself:

**1. Do you have online scheduling?** Online scheduling provides maximum convenience. The ability to schedule delivery appointments online lets the consumer decide what date and time is best for them.

**2. Do you have order visibility?** Along with the notion of convenience, consumers are anxious to know when to expect their delivery. Offering full visibility from origin to destination allows the supplier to communicate with the consumer on where their package is and when they can expect it.

**3. What service levels are you offering your customers?** Having predetermined service levels such as White Glove, Room of Choice, Threshold and Standard provide the consumer with a baseline of choices. The choice is there for them to decide. Whether they need the service due to personal restrictions, for convenience, or if they simply want to do it on their own; they decide.

**4. Will you take it to the next level?** Are you willing to think 'out of the box' to create a specialized level of delivery allowing such options as doorstep delivery of heavyweight/bulky items, or partnering with an airline to transform ground home delivery into an airfreight solution?

Although the initial process may be cumbersome and daunting, the extra efforts of creating a customized solution can prove extremely beneficial for both immediate and future needs. If your technology can adapt, and your team can manage, a customized solution can offer a reduction in claims, increased efficiency and improved time in transit. Feedback from Sales, Operations and Customer Service, along with the formation of small committees and or 'secret shoppers' provide insight into the buying experience, as well as some of the positives and negatives a consumer may face.

The teamwork and dependability needed to take these extra steps in the supply chain will showcase you not only as a 3PL, but most importantly, as a partner.



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Bill Keough, Managing Director,  
Supply Chain Transportation & Logistics Master's Program, University of Washington  
206-221-6407 • wkeough@uw.edu

## What Can Humanitarian Supply Chains Learn from the Private Sector?

**F**or-profit corporations have spent the past 20+ years optimizing their supply chains to provide superior customer service, improve responsiveness and cash flow and, ultimately, to boost profits. And a handful of stand-out enterprises like Amazon have actually altered expectations about the sort of results a best-in-class supply chain can deliver. Consumers, in both their personal and professional lives, now expect to receive not just on-time delivery but perfect orders (the right product delivered on-time, undamaged, and with the correct paperwork).

For a number of reasons, humanitarian supply chains have generally been slower than their corporate counterparts to re-engineer their global supply chains. Without a profit motive, most humanitarian organizations have focused on serving their constituencies by bringing them food and medicine above doing so at the lowest possible cost. When faced with famines and disease, this prioritization is pretty understandable. However, as donors begin to focus on allocating their funds to organizations who can deliver results by making the best use of every donated dollar, this has started to change.

As they seek greater supply chain efficiencies, many humanitarian organizations are now looking to the private sector for ideas. Optimizing a global supply chain, especially one that must function in low-infrastructure environments, is no small task. Some such improvements require massive investments. Selecting, configuring, and deploying an Enterprise Resource Planning system (ERP) costs millions for a large organization and full implementation can take years. Are there any inexpensive “quick-hits” that can still deliver significant results in service levels and cost? Yes.

**Performance management** is a term that has been around forever in the business world. At the top level, every business manages top level metrics like profits and customer satisfaction. But these performance management programs often fail to deliver the results they should as they move further down in the organization. Almost everyone in the business world has probably worked for a company that measures its employees on outcomes they cannot individually control—the fellow who installs transmissions on an assembly line may be measured and incentivized based

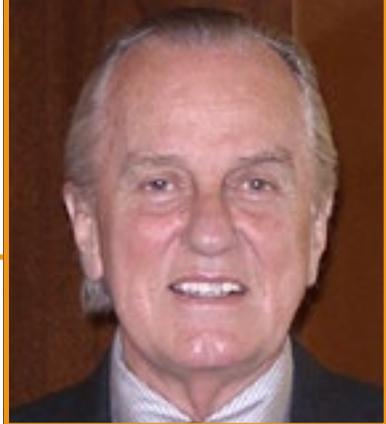
on the total number of automobiles that leave the factory each year.

Humanitarian supply chains have an opportunity to employ best practices in performance management to make their donor dollars go far further than they do today. If you lead a humanitarian supply chain, what can you do?

- Think about the functional groups within your organization, like warehousing or transportation. Work with each group to define the outcomes they deliver, calculate baseline performance, establish performance targets, and measure these individuals on performance in reaching those targets.
- Design an incentive program for achievement of performance targets. A pizza party (or whatever) is nice, but nothing drives improvement like money. Invariably, the value of the increased efficiencies far outweighs the cost of the incentives paid out.
- Repeat this process at each level of your internal supply chain operation. Be sure to develop metrics and targets that the workers can actually control. Pickers are measured on their individual results. Individuals who manage the pickers are measured on their collective results. Warehouse managers are measured on the speed and accuracy with which inbound orders are filled.
- At each successive level of the supply chain, the metrics and targets become more cross-functional. An upper level supply chain executive might be measured on perfect orders delivered to customers. Obviously this requires the forecasting, procurement, manufacturing, and distribution functions to work in harmony to achieve these targets.

Every supply chain executive seeks iterative improvement in cost, cycle time, accuracy, and quality. This approach to developing a cascading performance management program is the surest way to align the disparate functions in your supply chain. Measure people on results they can control and they will figure out more efficient and effective ways to do their jobs.

For a humanitarian supply chain, unlike a corporate supply chain, this means fewer hungry children, fewer sick mothers—quite literally the difference between life and death.



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Robert Walters, President, Freight Management Inc.  
714-224-7901 • [rwalters@freightmgmt.com](mailto:rwalters@freightmgmt.com)

## Data Management—Vital Today!

**Y**ears ago, I named my business “Freight Management” but today it should be called “Data Management” since that seems to be the business in which we find ourselves. Driven by competitors, by our clients, and by our own imagination, the effective collection of information can be invaluable if properly used and directed.

But there are value points in managing information gathered from a strong TMS system that can also provide a solid pre-audit program to double check accuracy of bills before payment. These points include:

- 1.** Tracking the duty paid on imported items with an eye to how much then reships to Canada, or falls into other categories, which will allow you to regain much of the duty paid.
- 2.** Having visibility of all shipments moving inbound or outbound until delivered. This information can be pushed or retrieved. This assumes that the freight is tendered by the shipper, or by the vendor, via the TMS that picks the approved carrier for the speed and distance of the shipment. The TMS usually notifies the carrier electronically and a bill of lading is prepared for printing for the consignee.
- 3.** Out of region freight moving from a warehouse outside the service zone is costly and a good TMS reporting system will identify these types of occurrences. Additionally, it should identify what SKUs are involved and how frequently it happened in the past week or month. All of this adds extra costs to the bottom line.
- 4.** Double/triple orders moving the same day to the same customer can be identified and allow steps to be taken in the future to consolidate such orders onto one bill of lading, not two or three. This typically happens when you have many items for sale and a customer such as Walmart will create an order for each one, which then triggers a bill of lading for each. In some cases, they insist on a bill of lading for each PO. A master bill of lading can overcome this need, which includes all the individual bills of lading onto one transaction.

Additionally, carriers will even consolidate the orders and then send one bill.

**5.** How often is the shipping staff or the vendor using the wrong carrier for the size, speed and distance of the order? This, too, can be expensive, and it is good to know when this occurs and where the failure is occurring.

**6.** Sometimes freight costs rise, and you may not be sure why. A good TMS should provide a report on all shipments for any period of time with average mileage, average weight, and cost per pound. Maybe freight order size is down, which will tend to raise the cost per pound, or orders are simply farther away than normal.

**7.** Identifying when accessorials (which are logged and summarized) of a given type are spiking. This could mean more home deliveries, more inside deliveries, etc. Counter action can then be taken to mitigate the costs.

**8.** Defend against charge back from the major retailers. This is now a major profit center. Allegations of late arrival, etc. are charged against you. A good TMS provides status and location of all shipments during the move, which will help that defense.

**9.** Develop a report card on all carriers for on-time delivery, claims ratio, or other factors

**10.** You can also chart the cost of fuel month to month, so you can better see the trends and prepare yourself or your customers.

**11.** By receiving a delivery receipt from the carrier, the process for filing claims for loss and damage is made easier and more accurate.

**12.** Finally, a good TMS will provide accurate accrual reports at the end of the month. However, all open orders across all modes must reside in it. The TMS can then calculate the charges you can expect from the carrier even if not billed or received yet.

Freight Management has such a TMS, and additionally the staff to manage it. Data management has become our main business.