

COMMENTS OF THE
INTERMODAL ASSOCIATION OF NORTH AMERICA, INC.

DOCKET NO. FMCSA-2004-19608
HOURS OF SERVICE OF DRIVERS

SUBMITTED TO THE
FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION

Dated: March 4, 2011

Introduction

On behalf of the diverse membership of the Intermodal Association of North America (IANA), following are our concerns regarding the Federal Motor Carrier Safety Administration's (FMCSA) proposed changes to current regulations on "Hours of Service (HOS) of Drivers." We believe that the changes will cause several unintended consequences that will adversely impact all intermodal freight transportation providers, including railroads, ocean carriers, and motor carriers, as well as the entire domestic and worldwide supply chain.

IANA is the only trade association in North America that represents the combined interests of intermodal freight transportation companies and their suppliers. Our membership of more than 950 members includes railroads, ocean carriers, motor carriers, and intermodal marketing companies. These railroad, ocean, and motor carrier members transport over 90% of all intermodal freight that moves throughout North America and the world.

The efficient movement of containerized freight relies heavily upon intermodal motor carriers that provide a critical link by transporting intermodal shipments to their final destinations, as well as betwC(d by)4.5n.6(anrriers)]5n.6(ad Tc .1051 w [(anrrFo 20.54 0 TD .001 Tcc .0683 T

the intermodal system for an estimated total annual volume of over 21 million units that required motor carrier services for pickup or delivery in 2010.

Preliminary calculations of IANA data suggest that motor carriers providing intermodal drayage services were directly responsible for pickup and delivery of between 38 and 39 million highway

Closing/Summary

IANA has a strong and ongoing interest in impr