

President & CEO

June 21, 2022

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Ave. SE
Washington, DC 20590

Re. Section 23011 of the Bipartisan
Infrastructure Law (BIL)

Dear Secretary Buttigieg:

I am writing to you on behalf of the Intermodal Association of North America, the only transportation trade association that represents the combined interests of all modes of transportation.

carrying containers loaded with cargo, could violate various state and federal maximum truck size and weight laws. Moreover, such added weight and redesigned chassis could impact the structural integrity of the equipment and cause dimensioning differences (e.g. such as road clearance). Standards for new and in-service equipment should be based on sound economic and engineering principles that improve safety, account for real-world operations, and consider unintended consequences.

A side underride guard mandate for intermodal chassis could also restrict the availability of these assets. Pulling over 750,000 intermodal chassis out of service for repairs and redesigns would create major operational challenges, as well as significant cost implications, leading to ripple effects throughout the supply chain in terms of chassis availability, congestion, freight movement/fluidity and land use. For example, at intermodal facilities (marine, rail, and depots) chassis are often stacked to maximize limited terminal space. Side underride guard requirements would decrease the number of chassis that can be stored within existing facilities, which would adver