



Intermodal Motor Carriers Conference

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Dear Surface Transportation Board Members:

The Intermodal Motor Carriers Conference, an affiliated conference of the American Trucking Associations, would like to thank you for holding the Surface Transportation Board Oversight Hearing on Demurrage and Accessorial Charges on May 22-23.

We write specifically to affirm our support of the testimony of Federal Maritime Commissioner, Rebecca Dye. The Commissioner testified of the FMC's interest to develop solutions to freight delivery system operational problems. The FMC has created Innovation teams to help address these problems and find solutions to them. Commissioner Dye implemented these Innovation Teams to help find resolutions for the Commission's current investigation into ocean carrier and marine terminal demurrage and detention charges.

Commissioner Dye testified of the Memphis Supply Chain Innovation Team, which also arose out of the FMC's demurrage and detention investigation. Ocean carrier detention charges for use of containers may accrue when containers are detained at a rail ramp; which makes the Memphis Team's conclusions relevant to the investigation that the Federal Maritime Commission is currently conducting.

The Memphis Supply Chain Team strongly believes that the most critical need for improvement in freight velocity and fluidity in and out of the rail ramps in Memphis is for a "single interoperable grey pool" of chassis. How chassis are made available is one of the most pivotal elements of the American international supply chain; and the lack of chassis choice or presence thereof, can single handedly determine productivity outcomes.

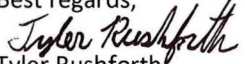
The Memphis Team concluded that the most essential qualities of a high performing gray chassis pool are:

1. Adequate supply of interoperable chassis;
2. Safe and good quality chassis;
3. Reasonable access to chassis: "choice on merchant haulage," and
4. Most critical, a pool manager, with authority and accountability for chassis supply.

The Memphis Team concluded that current chassis provisioning models are not keeping up with growing intermodal container demand and that change is necessary. One key proponent of change will be to implement Chassis Choice. The IMCC supports the recommendation of Commissioner Dye to "support greater chassis choice for motor carriers and shippers on merchant haulage moves."

The IMCC also supports the recommendation of the Memphis Team; that the gray chassis pool initiative would alleviate much of the underlying problem of congestion and grounding of shipments in and out of ports across the country.

Thank you again for holding this important Hearing on Demurrage and Accessorial Charges.

Best regards,

Tyler Rushforth
IMCC Executive Director