

# LANDSTAR

# GEMINI

Landstar Gemini, Inc.

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ADMINISTRATION

96 NOV 5 4 9 : 35

LEGS./REGS. DIV.

October 29, 1996

US Department of Transportation  
FHWA Docket No. MC-96-41  
Room 4232, HHC-10  
Office of Chief Council  
FHWA  
400 Seventh Street SW  
Washington, DC 20590

20191 QA

FHWA-97-2289-2

Dear Sir/Madame:

This is in response to the request for comments in the matter of development of a standard for protection against shifting cargo.

Landstar Gemini, Inc. is primarily a carrier of intermodal cargo containers through out North America. We serve all major ports and rail terminals with over 500 owner operator pieces of equipment. We rely on rail and steamship companies to furnish the chassis with cargo containers to provide service to our customers.

I whole heartily support the revision of existing securement special rule for cargo containers. This special rule needs to be written so there is no ambiguity in its meaning and intent. Cargo containers need to be secured with integral pins on chassis. Cargo containers should never be moved secured with chains, straps or other binders alone. If properly maintained, the integral locking devices work extremely well and have been proven to hold fully loaded containers to the chassis even when overturned in accidents.

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I have observed cargo containers moving on regular flat bed trailers with as few as two straps. While I don't profess to be a physicist, I believe such an arrangement to be potentially an accident waiting to happen. I would like to vote that all cargo containers must be secured with integral locking devices at each corner of the container with provisions that the locking devices be designed to prevent unintentional disengagement while the vehicle is enroute on the public highways.

I request to be placed on the distribution list for all notices of action on this docket.

Yours very truly,



Herman Fauss  
Director of Safety

GHF/jmm

cc: D. Lucchesi  
M. Harvey

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