

DEPT. OF TRANSPORTATION
DOCKET SECTION

New Jersey Motor Truck Association

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ORIGINAL

53581

April 5, 1999

Docket Clerk, U. S .DOT Dockets
Room PL40 1
400 Seventh Street, S.W.
Washington, D.C. 20590-000 1

Re: Docket FHWA-98-3656 - 14
RIN 2125-AE-40

Sir/Madam:

The issue of roadability for inter-modal container chassis' is very serious and cries out for an immediate remedy.

Our member's drivers dealing with intermodal container chassis' cannot find these kind of defects during a pre-trip inspection:

1. Crack in frame
2. Brake adjustment (cannot tell if pushrod play is 2" or 2 1/4")
3. Amount of brake lining
4. Cracked brake drum
5. Defective inside tires

If they leave with these kinds of defects and are stopped by commercial vehicle enforcement people dressed in coveralls, with creeper, calipers, rulers, etc., they will no doubt be placed out of service.

This out-of-service could occur near their start point or hundreds of miles away.

Presently the owner/driver of the power unit bears complete responsibility (and expense) for any such defects.

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In many cases the owner/driver of the power unit only has a chassis in his possession for a very short period of time and he may handle several chassis in a single day.

On roadside out-of-service reports or for even non out-of-service defects, the power unit person has to acknowledge he has taken care of repairs before sending a copy of the roadside report back to the enforcement folks.

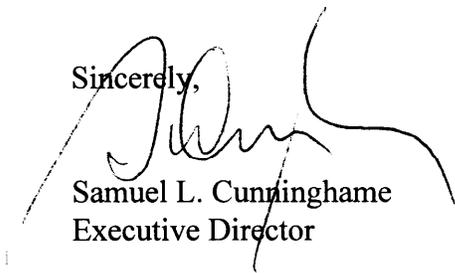
The chassis within the intermodal business are treated similar to coat hangers in a dry cleaning business . . . just something that has to be used to move a container from A to B.

The owners of these chassis should bear full responsibility for their maintenance and upkeep. They should be held accountable for any deviation from this responsibility.

If every chassis owner received a US DOT registration number and that number was placed on each of their units, then any infractions could be applied directly to the offending company.

In other words, the US DOT must expand the definition of motor carrier to include the owner's of intermodal chassis equipment.

Sincerely,



Samuel L. Cunniff
Executive Director

cc: R. Jones, BSHCC