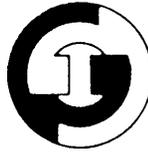


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ORIGINAL

GIVENS TRUCKING CO., INC.

1720 SOUTH MILITARY HIGHWAY . CHESAPEAKE, VIRGINIA 23320-1406

PHONE (804) 420-6891

April 12, 1999

DEPT. O TRANSPORTATION
DOCKET
5 APR 15 AM 11:35

Docket Clerk, US DOT Dockets
Room PL-401
400 Seventh St, SW
Washington, DC 20590-0001

Re: Docket Number 98-3656- 27

We would like to take the opportunity to comment on the reference. We haul up to 700 container each week in and out of the local port and railhead here in Tidewater Virginia.

It is not uncommon for there to be problems with the chassis or container. We have seen expired CVSA inspection stickers, pieces of tires missing, brake chambers loose or hanging by the air hose, broken springs, ICC bumpers with broken welds, doors that can not be properly latched shut or open, container box latches that could not be engaged and landing gears with missing handles. Many of these problems are found during the out bound interchange process, but keep in mind that the chassis and containers are also inspected when going inbound which means they may have been traveling our highways in that condition.

In some cases we have seen container chassis in which the brake adjustment holds long enough to connect to a tractor but after moving a short distance will not hold. While a driver is responsible to ensure his equipment is road worthy, most are not qualified to inspect or adjust brakes. In all cases, the driver, his company and insurance company is responsible for incidents and accidents involving containers. Even if a loose part falls from the container or chassis while on the highway they are responsible. You may have heard horror stories about wheels coming off container chassises and striking other vehicles. The driver is held responsible although the lugs on the Dayton or Bud wheel appeared to be tight with no rust streak (this would indicate a loose lung nut) when the container was picked up.

The owners of the chassises and containers have to be held responsible for their equipment. This is the only way to ensure only safe equipment is provided to the container haulers and a reasonable assurance that container and chassis you are passing

has brakes, the wheel will not come off and in fact the doors are latched and the contents can not fall out of it in your path of travel.

Best Regards,

A handwritten signature in black ink that reads "Mitch Casto". The signature is written in a cursive, slightly slanted style.

Mitch Casto
Terminal Manager

cc: file