



INSTITUTE OF INTERNATIONAL CONTAINER LESSORS

IICL CTB 016, March 2011

Title: IICL Owner / Intermodal Equipment Provider Best Practices

The IICL has issued a best practices information paper regarding the FMCSA regulations concerning roadability. This document outlines our perspective concerning the responsibilities of a leasing company and their interpretation of the regulations. This overview is meant as a guideline for the reader to understand how the regulations will be facilitated. With each chassis operation being unique this best practices paper should be referred to as an information paper as we have indicated. Specific operational responsibilities should be discussed with the owner / Intermodal Equipment Provider.



Intermodal Equipment Provider (IEP)

- **Responsibilities** – The owner in many instances will be designated as the equipment provider (IEP). Based on the particular situation (lease agreement / pooling operation / etc.) as outlined in a contract the IEP can change as a chassis moves from party to party. An owner/IEP must assure that his assets are maintained in accordance with the Federal Motor Carrier Safety Administrations 49 CFR final rulemaking as adopted on December 17, 2008.
- **Recordkeeping** – IICL member's policies and procedures allow for the capture of all gate movements in and out of facilities under their control or by contractual responsibilities. These include detailed gate inspections for both in-bound and out-bound equipment. In addition, inspection information is captured and used in the M&R process. Their systems allow for this information to be extracted and used in reports as well as a host of operational and billing requirements.
- **Reporting** – The ability to report operational and technical information to populate owner's operating systems is paramount. Owner specific policies and procedures detail their own internal requirements as well assure they comply with Federal Regulations.
- **Marking** – An owner/IEP must assure that their equipment is properly identified as outlined in Section 390.21 (Marking of Self-Propelled CMV's and Intermodal Equipment) of the Federal Register. This requirement allows the owner/IEP to follow one of four suggested marking schemes.



Inspections

- **Criteria** – Owners/IEP’s will be required to follow the inspection criteria as outlined in the Federal Register under Sections 49 CFR 392.7(b) and 49 CFR 396.11 (a). IICL members inspection criteria as denoted in the “Guide for Container Chassis Inspection and Maintenance” Fourth Edition allows for a more detailed inspection allowable under the new Federal Regulations. In addition, IICL Member Company’s also follow internal policies and procedures which clearly exceed in detail Federal Regulations as well as cover equipment specific maintenance requirements.

Driver/Customer Responsibilities

- **Driver Responsibilities** – As outlined in the Federal Regulations the driver of a commercial vehicle assumes certain responsibilities pertaining to inspections denoted in sections 392.7 and 396.11. These responsibilities call for a driver to inspection a chassis in accordance with the above referenced sections criteria for both in-bound and out-bound gate inspections. In addition, a driver is required to maintain a log with this information and submit in writing at time of in-bound inspection a condition report as outlined in section 396.12.
- **Pre Trip Inspections** – An Owner/IEP will conduct a detailed pre-trip inspection following their internal criteria. This is usually performed after a unit is repaired and prior to leaving their facility. A driver should also document and denote on their inspection report the condition of the equipment prior to leaving an Owner/IEP facility.
- **Post Trip Inspections** – An Owner/IEP will conduct a detailed post-trip inspection each time a chassis is re-delivered into one of their facilities following their inspection criteria. The information is captured and used for M&R and operational company specific requirements. This inspection should also include the driver’s inspection report which is federally mandated. The Owner/IEP will document this information and denote if not supplied by the driver.



- **Marking** – The Owner/IEP will check to make sure his equipment is marked properly. This will now include an approved FMCSA marking scheme in addition to the owners BIC registered prefix and internal numbering series.
- **Reporting** – All equipment which moves in and out of an Owner/IEP controlled facility must have documented information captured and reported internally as well as in accordance with contractual customer requirements.

Repairs

- **Criteria** – An IICL Owner/IEP will follow a manufacturer approved correction to any item found damaged on a chassis. A damaged, missing or broken chassis component will be corrected in accordance with the component specific repair method and meet all safety requirements.
- **Annual Inspections** – All IICL Owners/IEP's follow the current Federal or State (California BIT Program) Regulations which require an annual or quarterly FMCSA safety inspection.
- **Periodic Maintenance** – IICL Owners/IEP's follow internal periodic maintenance policies and procedures. These are usually facilitated as equipment moves in and out of their controlled facilities.



**Roadability
Key Dates**

FMCSA Published Final Rule	December 17, 2008
Effective Date	June 17, 2009
Compliance Date	December 17, 2009
Compliance Date Chassis Marking	December 10, 2010