

January 19, 2021

Mr. James (Wiley) Deck
Deputy Administrator
Federal Motor Carrier Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Support for Docket No. FMCSA–2020–0118

Dear Mr. Deck,

On behalf of the Intermodal Association of North America (IANA), a leading transportation trade association representing the combined interests of the intermodal freight industry, I am writing to express support for the Federal Motor Carrier Safety Administration’s proposed regulatory guidance to clarify when drivers may record time operating a commercial motor vehicle (CMV) as a “yard move,” Docket No. FMCSA–2020–0118.

IANA’s membership roster of over 900 corporate members includes not only intermodal and over-the-road motor carriers, but also railroads (Class I, short-line, and regional), water carriers and stacktrain operators, port authorities, intermodal marketing and logistics companies, and suppliers to the industry such as equipment manufacturers, leasing companies, and technology firms. IANA’s associate (non-voting) members include shippers (defined as the beneficial owners of the freight to be shipped), academic institutions, government entities, and non-profit trade associations.

IANA commends the FMCSA’s efforts in developing rulemakings and regulatory guidance that offer CMV drivers much-needed flexibility while also maintaining the highest safety standards. This proposed guidance will benefit drivers by offering a clear and consistent definition of “yard moves,” allowing such operations to be recorded as on-duty not driving time rather than driving time.

We appreciate and strongly support the proposal’s inclusion of intermodal and shipper’s facilities as properties that qualify as yards. To prevent potential misinterpretations, IANA respectfully requests that the FMCSA specifically list container yards and depots as applicable intermodal facilities in its forthcoming final guidance.

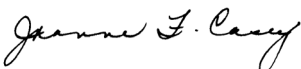
Intermodal CMV operators are often asked to move their vehicles short distances from, to and within container yards and depots, demonstrating the exact circumstances for which the special category “yard moves” was established. We would offer the following definitions for these two facilities:

- **Container Yard** – *a location or facility used for the storage of empty or loaded containers, while not in use or awaiting drayage.*
- **Depot** – *a location or facility where trucks, containers, chassis and/or trailers are housed or maintained, and from which they are dispatched for service.*

Incorporating these specific entities into the guidance document as facilities and movements that should be classified as “yard moves” would enhance driver efficiency and help ensure that current regulations are implemented as intended by the FMCSA.

Thank you for allowing IANA to share its views regarding the proposed guidance document on “yard moves” as it pertains to the intermodal industry. Please let me know if you or your staff would like to discuss our position in further detail.

Sincerely,



Joanne F. Casey
President and CEO