Maintenance & Repair Committee Meeting

The Westin Chicago Lombard, Grand Ballroom EF
Wednesday, May 8, 2024
1:30 – 2:30 PM
AGENDA

Wednesday, May 8, 2024
1:30 PM – 2:30 PM

I. [1:30 to 1:40 PM] Call to Order
   • Welcome and Introductions               Chris O’Hea, C&K Trucking, Chair
   • Safety Briefing                         IANA Staff
   • Antitrust Guidelines                    Marc Blubaugh, IANA Counsel:
   • Determination of Quorum                 Benesch, Friedlander, Coplan and Aronoff
   • Approval of February 23, 2024,          IANA Staff
     Meeting Minutes                        Bill Fluke, Columbia Group, Vice Chair

II. [1:40 PM to 2:00 PM] Task Force & Working Group Updates
    • Damage Prevention Outreach             Andrew Knouse, Norfolk Southern
      Program Task Force
    • Photographic Evidence                  Mark Smith, FYX Roadside Service
      Working Group

III. [2:00 PM to 2:05 PM] Underride Guard Update
     Marc Blubaugh, IANA Counsel
     Benesch, Friedlander, Coplan and Aronoff

IV. [2:05 PM to 2:20 PM] FMCSA Update
    Chelsea Castaneda
    Safety Operations Program Manager, FMCSA

V. [2:20 PM to 2:25 PM] Old Business
   Chair/Vice Chairs

VI. [2:25 PM to 2:30 PM] New Business
    Chair
    • M&R Roundtable Discussion Group
    • Items from the Floor
    • Next Meeting: IANA Intermodal EXPO
      Long Beach, CA September 9 – 11, 2024

VII. [2:30 PM] Adjourn
     Chair
Call to Order

• Welcome
  o Reminder of expectation for Committee members
    - Meetings include deliberation of issues, education, and discussion of recommended practices
    - Solicitation of business is not allowed during meetings
    - Members must abide by antitrust guidelines
    - Actively participate in Committee
Housekeeping

- Turn Cell Phones to Vibrate or Off

- **Please** No Side Bar Conversations

- **When Speaking**
  - Use a Microphone
  - Identify Yourself and Company Affiliation
Safety Briefing

Current Location:
• The Westin Lombard Chicago, Grand Ballroom EF
• 70 Yorktown Ctr, Lombard, IL 60148

Hotel Security:
• Security phone number is 630-361-7091

911 Assignment:
• Dial “0” from any Hotel Phone for Operator or “911” for Emergency Line;
  Front desk can call 911 to Lombard Police Department

AED Assignment:
• AEDs are located in Fitness center, lobby by front desk side by parking garage
  elevators, and security office.

First Aid Kit Assignment:
• 8 First Aid Kits locations: Sales office, security office, kitchen, front desk by the
  back offices, pool, fitness center, service express, housekeeping office

CPR Assignments:
• Primary?
• Secondary?
Safety Briefing - Continued

Evacuation Assignments:
• Primary?
• Secondary?
• Evacuation Routes – Nearest exit to Target parking lot
• Rally Point
  • Target parking lot
• Chairs pushed in – Avoid Tripping Hazards

Fire Extinguishers:
• Located in each alcove to the right and left of all entrances into the Grand Ballroom EF

Tornado Evacuation Route:
• Stairwell to basement, Stairwell 1 & 2 from the 18th floor to the lower level/basement.

Drills Scheduled or Planned for the Day:
• None scheduled or planned
Antitrust Guidelines
Antitrust Guidelines

Marc Blubaugh
IANA Counsel
Benesch, Friedlander, Coplan and Aronoff
Determination of Quorum

Approval of February 23, 2024, Meeting Minutes
Task Force and Working Group Updates
Thank you to the Participants

- Andrew Knouse, Norfolk Southern Corporation
- Brian Bellan, Georgia Ports Authority
- Ryan Bivinetto, BlackBerry Radar
- Ron Cordova, Zonar Systems, Inc.
- Ben Evans, CIE Manufacturing
- Chris Gates, Clarience Technologies
- Calvin Lin, Ventra Technology
- Tyler Lippincott, J.B. Hunt Transport Services, Inc.
- James Niccum, Rail Logistics, Inc.
- Thomas Novak, Rail Logistics, Inc.
- Chad Peterson, CPKC
- Deron Reese, J. B. Hunt Transportation Services, Inc.
- Pete Russo, Decisiv, Inc.
- Brad Ryckert, SKF USA Inc. Vehicle Service Market
- Jimmy Scardo, Norfolk Southern Corporation
- Eric Snyder, DCLI
Objectives

• Raise awareness and share information regarding preventable chassis damage with stakeholders involved in moving, storing and maintaining chassis

• Develop presentation tools and resources, which may be utilized by IANA members during local outreach events

• Materials to highlight proper use and handling of intermodal chassis and the operational and safety benefits of doing so
Damage Prevention Task Force

Past Deliverables
• Supervisor check list to mitigate damages
• Job briefing content
• Tools to keep your area clean
• What does it take to skid flat tires?
  o #1 damage reason for tires

What is next?
• Top chassis damages and cost
• Recommendations
Review of annual damages across a few different IEPs for domestic chassis was completed to understand OOS and cost impact. Tires topped the list on cost, securement devices topped the list on frequency.

**Pin Securement Damage**
- Estimated 300k instances
- $5.2M

**Total Tire Damage**
- >$25M
- >124K tires
Top Damages - Continued

**Landing Legs**
- >$12M
- >65K instances

**DOT Bumper**
- >$2M
- >10K instances
Recommended Next Steps

• Transition from the Damage Prevention Outreach Program Task Force to a new Joint Task Force, collaborating with OPS and Safety committee participants
  • Focus should be on:
    • Process owner engagement
      o Terminal operators
      o Motor Carriers/Drivers
      o BCO site operators
    • Driving best practices to reduce damage
Photographic Evidence Working Group

Mark Smith
FYX Fleet Roadside Service
Thank you to the Participants

- Mark Smith, FYX, Fleet Roadside Assistance, Group Leader
- Ryan Bivenetto, BlackBerry Radar
- Tim Farrell, Intermodal Cartage Co., Inc.
- Brooke Frerichs, Union Pacific Railroad Company
- Stefanie Fyfe, ContainerPort Group, Inc.
- Stevenson Kemp, South Carolina Ports Authority
- Andrew Knouse, Norfolk Southern Corporation
- Richard Lammers, Union Pacific Railroad Company
- Calvin Lin, Ventra Technology Inc.
- Angelina Mercado, TRAC Intermodal
- Holly Middleton, Norfolk Southern Corporation
- Timothy Moore, CSX Intermodal Terminals, Inc.
- Rob Movshin, Container Maintenance Corporation
- Kent Musick, Pratt Intermodal Chassis
- Anthony Noles, Dorsey Tire Company, Inc.
- JJ Pascente, Legend Trucking, Inc.
- Albert Perez, BNSF Railway
- Frank Puciul, SAF-HOLLAND
- Ron Smejkal, TRAC Intermodal
- Bill Traub, P & B Intermodal Services, Inc.
- Jeremy Worley, FYX Fleet Roadside Assistance
- Pete Young, Rail Logistics, Inc.
Initial suggestions for improvements/updates to the photographic evidence criteria and what we could propose for the Charter:

The current suggestions for consideration are below **BUT** please speak up if there are any missed or any other suggestions:

- Damages are damages, something along the lines of: “If cause of failure is determined to be damage versus NWT (normal wear and tear), regardless of why made code chalked on sidewall, the photographic or videography evidence can be used without chalking if the defect is clearly depicted in the documentation.
- Allow stickers for tire identification markings and as a secondary protocol to chalking.
- Inner Liner photo of run flat tire is in addition to support but can replace inner liner photo if exterior tire condition confirms run flat damage.
- Motor carriers supply photographic evidence as well.
- Videos can be used alongside photos for proper determination of cause of failure.
Photographic Evidence Task Force - Proposed Charter

I. BUSINESS CASE / PROJECT NEED

- The M&R Leadership team was requested to review the current Photographic Evidence for criteria improvement opportunities.

II. GOAL STATEMENT

- The task force will seek to establish improved criteria for tire photos to meet in order to be reliable evidence to validate cause of failure and proper determination of responsible party in lieu of returning the carcass.
- The Task Force will complete its review within recommended time frames.

III. WORK PLAN and TIMELINE

- The Task Force will use the following source documents:
  - AAR Interchange Rules
  - Exhibit C – UIIA
- The Task Force will investigate and research, as necessary, with outside resources such as scientific, tire experts, and academic advisors to assist with methods and processes that can support the Task Force goals.
Photographic Evidence Task Force - Proposed Charter (Continued)

III. WORK PLAN and TIMELINE (continued)

• The Task Force will cross reference tire conditions with Exhibit C and AAR Interchange Rules as it pertains to appropriate Why Made codes and proper tire markings.
• May 2024 – Vote by M&R Leadership team.
• June 2024 - Prepare survey for Task Force team to vote on criteria updates.
• July/August 2024 – Review results of survey with Task Force for final discussions and recommendations for M&R Leadership team.
• September 2024 – Propose criteria updates for M&R Leadership vote.

IV. DESIRED OUTCOMES

• Measurable confidence level in hypothesis.
• Charter approval by M&R Committee
• Updated criteria approval by M&R Committee
• IIEC reviews and adopts Task Force and M&R Committee Recommendations

V. ROLES AND RESPONSIBILITIES
Underride Guard Update
Underride Guard Update

Marc Blubaugh
IANA Counsel
Benesch, Friedlander, Coplan and Aronoff
FMCSA Update

Chelsea Castaneda
Safety Operations Program Manager
Federal Motor Carrier Safety Administration

Kevin Hall
Safety Investigator
Federal Motor Carrier Safety Administration
FMCSA Inspection Metrics for Intermodal Equipment (IME)
Chassis Inspections
Level 1 & Level 5 Inspections

18,835 inspections in 2023; 36% were Level 5

Source: FMCSA & IANA
Chassis Inspections
Level 1 & Level 5 Inspections

30% of total chassis inspections in 2023 had a violation

Source: FMCSA & IANA
Chassis Inspections
Level 1 & Level 5: 2023

Source: FMCSA & IANA

Red: Top 10 States
Yellow: 10 through 20 States
Green = Below Top 20
## Top 10 Jurisdictions for Chassis Inspections

### 2022 vs. 2023

<table>
<thead>
<tr>
<th>State</th>
<th>2022</th>
<th>% of Total</th>
<th>State</th>
<th>2023</th>
<th>% of Total</th>
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<td>CA</td>
<td>11,830</td>
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<tr>
<td>TX</td>
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<td>VA</td>
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<td>1,215</td>
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<tr>
<td>MD</td>
<td>565</td>
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<td>Federal</td>
<td>562</td>
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<tr>
<td>Federal</td>
<td>459</td>
<td>2%</td>
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<tr>
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<td>HI</td>
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<td>WI</td>
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<td>1%</td>
<td>WI</td>
<td>256</td>
<td>1%</td>
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Source: FMCSA & IANA
## Inspections vs. OOS Rates

2023

<table>
<thead>
<tr>
<th>State</th>
<th>2023</th>
<th>% of Total</th>
<th>OOS Rate</th>
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<td>CA</td>
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<td>VA</td>
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<td>6%</td>
<td>26%</td>
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<tr>
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<td>2%</td>
<td>21%</td>
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<tr>
<td>WI</td>
<td>256</td>
<td>1%</td>
<td>31%</td>
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</table>

Source: FMCSA & IANA
Chassis Violations
Level 1 & Level 5: 2023

Red: Top 10 States
Yellow: 10 through 20 States
Green = Below Top 20

Source: FMCSA & IANA
### Top 10 Jurisdictions for Chassis Violations

#### 2022 vs. 2023

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<th>State</th>
<th>2023</th>
<th>% of Total</th>
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<td>GA</td>
<td>404</td>
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<td>SC</td>
<td>333</td>
<td>3%</td>
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Source: FMCSA & IANA
Chassis Inspections with OOS Violations
Level 1 & Level 5 Inspections

Source: FMCSA & IANA
Chassis OOS Violations Rates
Level 1 & Level 5 Inspections

Chassis OOS Rate = \( \frac{\text{Chassis Inspections w/ OOS Violation(s)}}{\text{Total Chassis Inspections}} \)

<table>
<thead>
<tr>
<th>Year</th>
<th>Chassis OOS Rate</th>
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<tbody>
<tr>
<td>2019</td>
<td>15.19%</td>
</tr>
<tr>
<td>2020</td>
<td>15.10%</td>
</tr>
<tr>
<td>2021</td>
<td>17.46%</td>
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<tr>
<td>2022</td>
<td>22.71%</td>
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<tr>
<td>2023</td>
<td>20.76%</td>
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</table>

Source: FMCSA & IANA
Chassis OOS Violations Rates (Level 1)

Source: FMCSA & IANA
# Top 10 Jurisdictions with Highest Chassis OOS Rates*

**2023**

<table>
<thead>
<tr>
<th>State</th>
<th>Inspection Total</th>
<th>OOS Rate</th>
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<tbody>
<tr>
<td>Tennessee</td>
<td>179</td>
<td>49%</td>
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<tr>
<td>Michigan</td>
<td>206</td>
<td>44%</td>
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<td>Missouri</td>
<td>129</td>
<td>43%</td>
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<td>Georgia</td>
<td>264</td>
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<td>Washington</td>
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<td>Arkansas</td>
<td>139</td>
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</tr>
<tr>
<td>Wisconsin</td>
<td>256</td>
<td>31%</td>
</tr>
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</table>

* Jurisdictions with a minimum of 50 total inspections

Level 1 & Level 5 Inspections

Source: FMCSA & IANA
Top 10 Jurisdictions with Lowest Chassis OOS Rates*

<table>
<thead>
<tr>
<th>State</th>
<th>Inspection Total</th>
<th>OOS Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>California</td>
<td>11,830</td>
<td>10%</td>
</tr>
<tr>
<td>Virginia</td>
<td>1,357</td>
<td>11%</td>
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<tr>
<td>Arizona</td>
<td>58</td>
<td>19%</td>
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<tr>
<td>Kentucky</td>
<td>78</td>
<td>21%</td>
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<tr>
<td>Maryland</td>
<td>321</td>
<td>21%</td>
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<td>New Jersey</td>
<td>74</td>
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<td>South Carolina</td>
<td>351</td>
<td>23%</td>
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<td>Illinois</td>
<td>57</td>
<td>25%</td>
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<td>Federal</td>
<td>562</td>
<td>26%</td>
</tr>
<tr>
<td>Texas</td>
<td>1,215</td>
<td>26%</td>
</tr>
</tbody>
</table>

Level 1 & Level 5 Inspections

* Jurisdictions with a minimum of 50 total inspections

Source: FMCSA & IANA
Top 10 Chassis Violations

Source: FMCSA & IANA

Level 1 & Level 5 Inspections

393.47(e) - BRAKE OUT OF ADJUSTMENT - CLAMP / ROTO
393.9 - INOPERABLE REQUIRED LAMP
393.45(b)(2) - BRAKE HOSE OR TUBING CHAFING / KINKING
393.53(b) - DEFECTIVE/INOPERATIVE AUTOMATIC SLACK
393.9 - INOPERATIVE TURN SIGNAL
393.53(b) - DEFECTIVE/INOPERATIVE AUTOMATIC SLACK
393.55(e) - NO OR DEFECTIVE ABS MALFUNCTION INDICATOR LAMP
393.75(a)(3) - TIRE-FLAT AND/OR AUDIBLE AIR LEAK
396.3(a)(1) - BRAKES OUT OF SERVICE
393.126 - FAILURE TO ENSURE INTERMODAL CONTAINER SECUREMENT
Top 10 Chassis OOS Violations

1. 393.9 - INOPERATIVE TURN SIGNAL
2. 393.75(a)(3) - TIRE-FLAT AND/OR AUDIBLE AIR LEAK
3. 393.9 - INOPERATIVE BRAKE LAMP
4. 396.3(a)(1) - BRAKES OUT OF SERVICE
5. 393.126 - FAILURE TO ENSURE INTERMODAL CONTAINER SECUREMENT
6. 393.9 - INOPERABLE REQUIRED LAMP
7. 393.207(a) - AXLE POSITIONING PARTS DEFECTIVE/MISSING
8. 393.45(b)(2) - BRAKE HOSE OR TUBING CHAFING AND/OR KINKING
9. 393.48(a) - INOPERATIVE / DEFECTIVE BRAKES
10. 393.126(b) - DAMAGED OR MISSING TIEDOWN OR SECUREMENT DEVICE

Source: FMCSA & IANA
Top 10 Chassis Violations (IEP)

Source: FMCSA & IANA

Level 1 & Level 5 Inspections
Top 10 Chassis OOS Violations (IEP)

Source: FMCSA & IANA
Top 10 Chassis Violations (MC)

Source: FMCSA & IANA

- 393.47(e) - BRAKE OUR OF ADJUSTMENT - CLAMP / ROTO
- 393.9 - INOPERABLE REQUIRED LAMP
- 393.45(b)(2) - BRAKE HOSE OR TUBING CHAFING AND/OR KINKING
- 393.53(b) - DEFECTIVE/INOPERATIVE AUTOMATIC SLACK
- 393.9 - INOPERATIVE BRAKE LAMP
- 393.55(e) - NO OR DEFECTIVE ABS MALFUNCTION INDICATOR LAMP
- 393.9 - INOPERATIVE TURN SIGNAL
- 393.75(a)(3) - TIRE-FLAT AND/OR AUDIBLE AIR LEAK
- 396.3(a)(1) - INSPECTION, REPAIR AND MAINTENANCE OF PARTS AND ACCESSORIES
- 393.126 - FAILURE TO ENSURE INTERMODAL CONTAINER SECUREMENT

Level 1 & Level 5 Inspections
Top 10 Chassis OOS Violations (MC)

Level 1 & Level 5 Inspections

Source: FMCSA & IANA
Tractor OOS Violation Rates
Level 1 & Level 5 Inspections involving Intermodal Chassis

Tractor OOS Rate = \( \frac{\text{Tractor Inspections w/ OOS Violations}}{\text{Total Tractor Inspections}} \)

<table>
<thead>
<tr>
<th>Year</th>
<th>Tractor OOS Rate</th>
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</thead>
<tbody>
<tr>
<td>2019</td>
<td>15.57%</td>
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<tr>
<td>2020</td>
<td>15.48%</td>
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<tr>
<td>2021</td>
<td>17.02%</td>
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<tr>
<td>2022</td>
<td>19.94%</td>
</tr>
<tr>
<td>2023</td>
<td>20.09%</td>
</tr>
</tbody>
</table>

Source: FMCSA & IANA
Top 10 Tractor OOS Violations

- 396.3(a)(1) - BRAKES OUT OF SERVICE
- 393.75(a)(3) - TIRE-FLAT AND/OR AUDIBLE AIR LEAK
- 393.45 - BRAKE TUBING AND HOSE ADEQUACY
- 393.45(b)(2) - BRAKE HOSE OR TUBING CHAFING AND/OR KINKING
- 396.3(a)(1) - BRAKE SYSTEM PRESSURE LOSS
- 393.209(d) - STEERING SYSTEM COMPONENTS WORN, WELDED, OR MISSING
- 393.207(a) - AXLE POSITIONING PARTS DEFECTIVE/MISSING
- 393.45(d) - BRAKE CONNECTIONS WITH LEAKS OR CONSTRUCTIONS
- 393.43(a) - NO/IMPROPER TRACTOR PROTECTION VALVE
- 393.47(a) - INADEQUATE BRAKES FOR SAFE STOPPING/BRAKE LINING

Source: FMCSA & IANA
Top 10 Driver OOS Violations

1. 395.8(a) - ELD - NO RECORD OF DUTY STATUS (ELD REQUIRED)
2. 395.8(e) - FALSE REPORT OF DRIVERS RECORD OF DUTY STATUS
3. 383.23(a)(2) - OPERATING A CMV WITHOUT A CDL
4. 391.41(a) - NO MEDICAL CERTIFICATE IN DRIVER'S POSSESSION
5. 395.8(a) - NO RECORD OF DUTY STATUS WHEN ONE IS REQUIRED (ELD NOT REQUIRED)
6. 395.8(k)(2) - DRIVER FAILING TO RETAIN PREVIOUS 7 DAYS RECORD OF DUTY STATUS
7. 391.11(b)(4) - DRIVER OPERATING A CMV WITHOUT PROPER ENDORSEMENTS OR IN VIOLATION OF RESTRICTIONS
8. 390.3(e) - PROHIBITED FROM PERFORMING SAFETY SENSITIVE FUNCTIONS PER DRUG & ALCOHOL CLEARINGHOUSE
9. 392.2 - STATE/LOCAL HOS
10. 395.3(a)(2) - DRIVING BEYOND 14 HOUR DUTY PERIOD

Source: FMCSA & IANA
FMCSA Intermodal Equipment Provider Program
FMCSA IEP Program Contacts

**Western Service Center**
AK, AZ, CA, CO, HI, ID, MT, ND, NM, NV, OR, SD, TX, UT, WA, WY, Am. Samoa, Guam, Northern Mariana Islands
**Traci Johnson**, Safety Operations Program Manager, Traci.Johnson@dot.gov, (360) 951-7920

**Southern Service Center**
AL, AR, FL, GA, KY, LA, MS, NC, OK, SC, TN
**Sean Anderson**, Safety Operations Program Manager, Sean.Anderson@dot.gov, (502) 330-6973

**Eastern Service Center**
CT, DC, DE, MA, MD, ME, NH, NJ, NY, PA, PR, RI, VA, VT, WV
**Stephen Hrabovsky**, Service Center Director, Stephen.Hrabovsky@dot.gov, (443) 703-2247
**Donald Orye**, Safety Investigator, Donald.Orye@dot.gov
**Mariana Greco**, Safety Investigator, Mariana.Greco@dot.gov

**Midwestern Service Center**
IA, IL, IN, KS, MI, MN, MO, NE, OH, WI
**Chelsea Castaneda**, Safety Operations Program Manager, Chelsea.Castaneda@dot.gov, (785) 230-5184
**Kevin Hall**, Safety Investigator, Kevin.Hall@dot.gov, (573) 469-2111
Old Business
New Business
• Monthly one hour meeting

• Industry professionals engaged collaborative and non-competitive discussion

• Led by a moderator (Group Leader) – moderator can be switched out monthly

• Discussion comprised of timely or compelling topic, industry issue or concern

• Potential for creating new Working Groups and Task Forces, educational sessions and topics for EXPO and Business Meeting

• Excellent opportunity for networking, professional development and collaboration
• Items from the Floor
• Next Meeting:
  IANA Intermodal EXPO
  Long Beach, CA
  September 9 – 11, 2024
Adjourn