



Side Underride Guards and Intermodal Chassis



Dennis Lombardi - April 24, 2024

Overview

IICL is the leading trade association of the container and chassis leasing industry. Organized in 1971, the IICL represents lessors of maritime containers and intermodal chassis.

On the chassis side, IICL chassis lessors own a large majority of the more than 700,000 chassis operating in the United States, providing them to ocean carriers, motor carriers and shippers through a variety of daily rental and lease arrangements.



Importance of Statutory Mandate in IIJA

Section 23011(c) of the Infrastructure Investment and Jobs Act (“IIJA”) requires the Secretary to conduct additional research on side underride guards to better understand their overall effectiveness and to assess the feasibility, benefits, and costs of side underride guards, **taking into account any impacts on intermodal equipment, freight mobility (including port operations), and freight capacity** associated with the installation of side underride guards on newly manufactured trailers and semitrailers, including intermodal chassis. This work was to be done before determining if a side underride guard requirement is warranted. During the deliberations on the IIJA, Congress included language that **specifically requires the U.S. Department of Transportation (“DOT”) to consider the unique structural and operational aspects of intermodal chassis** when evaluating a side underride guard requirement.



Potential for Supply Chain Disruptions

- Side underrides could impede stacking for (1) over the road or rail transport and for (2) efficient storage at a port or rail terminal. Repositioning is key to the fluidity of the supply chain, as is efficient storage.
- Installation of side underride guards would increase the weight of a chassis and displace cargo.
 - This will increase the number of trucks overall on the road and create a larger carbon footprint per ton of material moved.
- Chassis underrides are likely to be damaged as a result of stacking. The cost of M&R would likely skyrocket.



Technical feasibility of side underride guards

- A side underride guard is not suitable for an intermodal chassis as they are currently constructed.
- Side underrides are installed to the bottom rails and crossmembers of a trailer, which an intermodal chassis does not have.
 - Additional strength members on chassis would be required, adding to the weight and increasing the financial costs.