



U.S. Department
of Transportation

**National Highway
Traffic Safety
Administration**

Memorandum

Subject: **ACTION:** Ex Parte Meeting with Intermodal Freight
Industry Representatives

Date:

From: Shashi Kuppa
Director
Office of Crashworthiness Standards

To: Docket No. NHTSA-2023-0012

Through: Terrence Sommers
Assistant Chief Counsel
Office of Chief Counsel

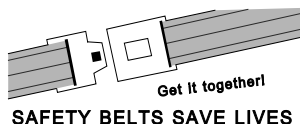
On October 18, 2023, at the request of Direct ChassisLink Inc. (DCLI), representatives from intermodal freight industry organizations met with National Highway Traffic Safety Administration (NHTSA) staff regarding the Advance Notice of Proposed Rulemaking (ANPRM), "Side underride guards on trailers and semitrailers," RIN:2127-AM54. The meeting was held using a hybrid in-person and teleconference format. The intermodal representatives reiterated the concerns they expressed in comments submitted to the docket of the ANPRM and requested that intermodal chassis be exempt from any side underride guard requirement.

Attendees:

Intermodal representatives

In-person:

Geoffrey Burr, Brownstein Hyatt Farber Schreck, LLP
Darrell Conner, K&L Gates
Dave Esposito, DCLI
James Fitzgerald, TTX Company
David Garofalo, Intermodal Association of North America
Doug Hoehn, Milestone
Dennis Lombardi, Institute of International Container Lessors
Robert Murray, National Association of Waterfront Employers
Val Noel, TRAC Intermodal
Mike O'Malley, DCLI
Jason Teel, Union Pacific
Matt Wiggins, American Association of Port Authorities



Online:

Katherine Bennett, FlexiVan

Daniel Carter, Association of American Railroads

Stephen Gordon, Association of American Railroads

Dana Grbic, FlexiVan

Chris Luebbers, Norfolk Southern

Elle Marie Stuart, K&L Gates

NHTSA staff

In-person: James Myers

Online: Larry Blincoe, Milton Cooper, Shashi Kuppa, Ryan Posten, Sean Puckett, Callie Roach,
Neil Thurgood, Lina Valivullah

Please submit this memorandum to Docket No. NHTSA-2023-0012.