

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

Index

A.	FMCSA RULES AND REGULATIONS (FROM THE FEDERAL REGISTER).....	2
B.	WHAT DO THE RULES MEAN IN GENERAL TERMS	2
C.	DEFINITIONS IN THE REGULATIONS	3
D.	HOW DO THE RULES AFFECT THE IEP’S AND THE MOTOR CARRIERS	3
E.	DATES OF ENFORCEMENT OF THE RULES AND REGULATIONS	6
F.	FMCSA COMPLIANCE BY THE IEP AND THE MOTOR CARRIERS.....	6
G.	EXPLANATION OF “CHASSIS.COM”	7
H.	EXPLANATION OF “GIER” AND “IDD”	10
I.	HOW THE DATA IS HANDLED AND WHAT IS DONE WITH IT	11
J.	HOW THE MOTOR CARRIER/DRIVER SUBMITS A DVIR/DVER	13
K.	RECEIVING LOCATIONS FOR DVIR’S.....	16
L.	THE ROLE OF A DEPOT, M&R VENDOR, RAIL RAMP AND MARINE TERMINAL	16
M.	WHAT HAPPENS WITH A SUBMITTED DVIR ?.....	18
N.	HOW THE PRE-TRIP DVIR IS HANDLED	20
O.	FURTHER QUESTIONS	20

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

A. FMCSA RULES AND REGULATIONS (FROM THE FEDERAL REGISTER)

1. Where can I find the FMCSA regulations and rulemaking?

http://www.fmcsa.dot.gov/rules-regulations/administration/rulemakings/rule-programs/rule_making_details.aspx?ruleid=289

2. Why is FMCSA issuing this regulation?

The Federal Motor Carrier Safety Administration (FMCSA) is issuing this final rule to implement provisions in section 4118 of the Safe, Accountable, Flexible, and Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), applicable to “Roadability.” Section 4118 is codified in 49 U.S.C. 31151.

B. WHAT DO THE RULES MEAN IN GENERAL TERMS

1. How does the rule change part 392, Driving of Commercial Motor Vehicles?

The rule adds an inspection requirement for drivers. Drivers preparing to transport IME must make an inspection of the following components, and must be satisfied they are in good working order before the equipment is operated over the road.

Drivers who operate the equipment over the road are deemed to have confirmed that the following components were in good working order when the driver accepted the equipment. The driver submits this report at the end of each day’s work on each vehicle operated.

Service brake components that are readily visible to a driver performing as thorough a visual inspection as possible without physically going under the vehicle, and trailer brake connections;

- Brakes
- Lighting devices, lamps, markers, and conspicuity marking material
- Wheels, rims, lugs, tires
- Air line connections, hoses, and couplers
- King pin upper coupling device
- Rails or support frames
- Tie down bolsters
- Locking pins, clevises, clamps, or hooks
- Sliders or sliding frame lock

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

2. How often is the DVIR submitted to the IEP?

One DVIR report, at the end of the total use (e.g. possibly multiple day usage) of the equipment.

3. Does a driver need to report a DVIR if he never unhooks from the chassis at a facility?

No, the DVIR reporting requirement is applicable when the chassis interchanged to the IEP.

C. DEFINITIONS IN THE REGULATIONS

1. What are the new terms/definitions in the regulation?

Interchange means the act of providing intermodal equipment (IME) to a motor carrier pursuant to an IME interchange agreement for the purpose of transporting the equipment for loading or unloading by any person or repositioning the equipment for the benefit of the equipment provider. It does not include the leasing of equipment to a motor carrier for primary use in the motor carrier's freight hauling operations.

Intermodal equipment (IME) means trailing equipment that is used in the intermodal transportation of containers over public highways in interstate commerce.

Intermodal equipment provider (IEP) means any person that interchanges IME with a motor carrier pursuant to a written interchange agreement or has a contractual responsibility for the maintenance of the IME.

2. What is a DVER?

DVER is an abbreviation for Driver Vehicle Examination Report. This report is the result of the roadside inspection of an IME.

D. HOW DO THE RULES AFFECT THE IEP'S AND THE MOTOR CARRIERS

1. To whom does this rule apply?

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Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

The rule applies to IEPs and to motor carriers and drivers operating IME.

2. What must IEPs do regarding the new regulations?

Each IEP must:

- a) Register and file using FMCSA Form MCS-150C.
- b) Mark its IME with the USDOT number, as required by § 390.21, before tendering the equipment to a motor carrier, or register its intermodal equipment in a system that meets the regulation requirements (e.g. GIER). This marking or registering is required by December 17, 2010;
- c) Establish a systematic inspection, repair, and maintenance program to assure the safe operating condition of IME;
- d) Systematically inspect, repair, and maintain all IME intended for interchange with a motor carrier;
- e) Ensure that IME intended for interchange with motor carriers is in safe and proper operating condition;
- f) Periodically inspect IME intended for interchange;
- g) Maintain a system of driver vehicle inspection reports submitted to the IEP as required by § 396.11;
- h) At facilities at which the IEP makes IME available for interchange, have procedures in place and provide sufficient space for drivers to perform a pre-trip inspection of tendered IME;
- i) At facilities at which the IEP makes IME available for interchange, develop and implement procedures to repair any equipment damage, defects, or deficiencies identified as part of a pre-trip inspection, or replace the equipment, prior to the driver's departure. The repairs or replacement must be made after being notified by a driver of such damage, defects, or deficiencies;
- j) Refrain from placing IME in service on the public highways if that equipment has been found to pose an imminent hazard, as defined in § 386.72(b)(1).
- k) Maintain documentation of its maintenance program; and
- l) Develop and provide a means to effectively respond to driver and motor carrier reports about IME mechanical defects and deficiencies.

3. What if the driver does not report a DVIR?

The IEPs nor the facilities enforce the non-reporting of DVIRs. That is between the driver and the DOT. The IEPs are not required to report any lack of driver reporting to the DOT.

4. If the driver reports a DVIR with a defect, will he more likely be billed for damaging a chassis?

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Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

The best protection for a driver to not receive an invoice for damaging a chassis is to perform a thorough pre-trip inspection. The DVIRs with defects may be used by some IEPs to help identify IME that have damage. The contract between the IEP and motor carrier will determine who is responsible for damage.

5. We are a heavy haul trucking company that picks up and delivers to the ports. We do not interchange any equipment or trailers. Does this DVIR System include us and if so what forms are required by our company for our equipment?

If you are not interchanging chassis for daily use, you are not affected by the regulations. The Regs are only for interchanged intermodal equipment, e.g. ocean carrier chassis.

6. What consequences will there be to the trucker/driver that does not follow these procedures?

The IEPs and facilities have no policing authority over the drivers to complete a DVIR. The DOT is the only one requiring the driver to make out the reports. The IEPs and facilities will not audit missing DVIRs. The non-defect DVIRs will not be sent to the facility or M&R vendors. The IEPs are obligated to retain them for 3 months and then they will no longer need the records.

The drivers are the ones who are obligated to report the non-defect DVIRs.

7. Does this rule change safety requirements that apply to drivers and motor carriers?

Yes, the safety requirements have changed:

Before operating IME over the road, the driver accepting the equipment must inspect the equipment components listed in § 392.7(b) and be satisfied that they are in good working order; and

A driver or motor carrier transporting IME must report to the IEP, or its designated agent, any known damage, defects, or deficiencies in the IME at the time the equipment is returned to the IEP or its designated agent. If no damage, defects, or deficiencies are discovered by the driver, the report shall so indicate. The report must include, at a minimum, the items in § 396.11(a)(2).

8. Why bother reporting a DVIR if there is no known damage, defects or deficiencies?

The regulations as currently written require the reporting of DVIRs with no known defects. Contrary to these rules issued by the FMCSA, the actual legislation, SAFETEA-LU, specifically requires the reporting of defects while not mentioning the reporting of

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

non-defective equipment. The Ocean Carriers Equipment Management Association (OCEMA) is petitioning the FMCSA to revise the rules to no longer require the reporting of DVIRs when no defects are known.

9. As a motor carrier how are we to report chassis inspections to equipment providers who are not supporting the Chassis.com system?

You will need to ask the IEP. Each IEP may define its own process.

E. DATES OF ENFORCEMENT OF THE RULES AND REGULATIONS

1. When does the rule go into effect?

December 17, 2009

IEPs must submit the IEP Identification Report (Form MCS-150C).

IEPs must establish systematic inspection, repair, and maintenance programs.

All other aspects of the regulations other than the ones noted below.

June 30, 2010

IEPs must have a process in place to receive DVIRs from truckers.

Truckers must report DVIRs on IEM to the IEPs.

December 17, 2010

The IEP's must register their equipment in a public system (e.g.GIER) or mark their DOT number on each piece of equipment.

F. FMCSA COMPLIANCE BY THE IEP AND THE MOTOR CARRIERS

1. How will FMCSA review compliance with the new rules?

FMCSA will conduct roadability reviews on IEPs. A roadability review is an on-site examination of the IEP's compliance with the applicable Federal Motor Carrier Safety Regulations.

2. What happens if an IEP is found to be in noncompliance during a roadability review?

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Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

Although FMCSA will not assign a safety rating to an IEP as a result of a roadability review, it will cite the IEP for violations found and may impose civil penalties.

3. What are the consequences if an IEP, motor carrier, or driver is found to be in violating the rules?

In very general terms, consequences range from a written citation (with or without a monetary penalty), to placing an item of IME out-of-service at roadside, to prohibiting a motor carrier from transporting IME, to prohibiting an IEP from tendering IME.

4. Who will enforce the regulations?

Besides FMCSA agents, local and State law enforcement officials can enforce compliance with the regulations. It is anticipated that Federal enforcement officials will initiate roadability reviews on IEPs or motor carriers.

G. EXPLANATION OF “CHASSIS.COM”

1. What is “Chassis.com”

A group of IEPs has collectively developed a common approach to receive DVIRs from truckers. This approach is in the form of a program and web portal. Chassis.com is the name of the system that OCEMA has licensed from ADVENT for their DVIR Receipt System (DRS). This is a hosted product available from ADVENT for chassis management such as tracking, M&R and DVIR and other inspection processing.

2. Which IEPs are using Chassis.com?

The IEPs that indicated they would support this system solution include:

Atlantic Container Line

APL

Chicago-Ohio Valley Chassis Pool

CMA-CGM

CSAV

China Shipping

COSCO

Crowley

Denver Consol. Chassis Pool

K Line

Maersk

MSC

Midwest Consol. Chassis Pool

Mid South Consol. Chassis Pool

MOL

NYK

OOCL

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Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

Evergreen	Seacastle Chassis (at ports)
Flexi-Van	South Atlantic Consol. Chassis Pool
Gulf Consol. Chassis Pool	Steamship Line Coop Chassis Pool
Hapag Lloyd	United Arab
Horizon Line	Yang Ming
Hanjin	Zim
Hyundai	

Most international equipment IEPs will use Chassis.com as a tool to collect DVIRs from drivers. Unless the IEP has agreed to some other means of collecting DVIRs at a specific location, drivers will submit their DVIRs using Chassis.com in advance of returning the chassis to the IEP. While there may be some regional differences and specific facility differences in reporting methods, it is anticipated that there will be instructions for when reporting means other than Chassis.com are to be used.

3. Are DVIRs handled by Chassis.com?

No, receiving DVIRs are not within the scope of Chassis.com. The motor carrier will need to communicate the DVIRs to the IEP separately. There are specific reporting requirements of the motor carrier and IEP specified in the regulations under section 396.9.

4. Do IEPs need to register with Chassis.com?

Yes, IEPs will need to register with Chassis.com and agree to terms and conditions in order to use Chassis.com to collect and handle its DVIRs. A User Agreement will be provided for each IEP to sign after registration. It will include an authorization to release GIER information to Chassis.com.

5. What is the cost for Chassis.com?

The costs of operating Chassis.com will be shared by the IEPs. If a motor carrier requests specialized reports of the DVIRs submitted through Chassis.com, a programming fee may be charged.

6. Is it required for IEPs to register in GIER to use Chassis.com?

Yes, IEPs will need to subscribe to and register their chassis fleet in GIER so that Chassis.com can identify which IEP is responsible for which chassis. The expense for registering in GIER is the responsibility of each IEP. The latest forms for registering in GIER are available from through IANA www.intermodal.org. Please note that the IEP must have already received its DOT number from FMCSA in order to register its fleet with GIER.

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Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

- 7. Who is our technical contact? We need a contact immediately to begin setting up the channel of communication for EDI. We'll also need a technical person who can supply test data, answer questions as needed.**

Email helpdesk@chassis.com

- 8. What is required of motor carriers to follow the process defined with Chassis.com?**

Motor Carriers are required to register in Chassis.com in order for Chassis.com to accept the DVIRs. The primary reason for this registration is to satisfy the electronic signature requirements for subsequent DVIR reporting and to keep a record of the DVIR. For simplicity and uniformity, the driver's IDD PIN will be used when possible, and the motor carrier SCAC code.

Registration of Motor Carriers and Drivers on the web site www.Chassis.com is available now.

For Drivers

Drivers who wish to access the system directly for DVIR entry or reports will need to register with chassis.com.

Drivers already registered in IANA's Intermodal Driver Database (IDD) will have an option of using their IDD PIN as their chassis.com login during the registration process.

For Motor Carriers

Motor carriers as agents for the driver, will be able to report DVIRs for their drivers. Also, Motor Carriers may want to access reports available in Chassis.com. They will need to register online through the online registration at chassis.com.

For EDI interfaces

There is set up information needed when a Motor Carrier or a service it may use wants to use EDI to transmit DVIRs to Chassis.com and/or receive EDI confirmation. Detailed information will be posted on the web page.

- 9. Will our drivers have to be registered or the company only?**

The company could be registered without a driver registering on his own. The motor carrier can list all the drivers and then perform input for each of them. If a driver registers directly, he has the option to register under multiple motor carriers and can input for any of his companies he works for.

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

10. Will there be a fee for the motor carriers?

There is no fee from chassis.com for reporting DVIRs.

If a motor carrier wants specialized reports on previous DVIRs, we may have to charge a fee for that.

11. Will we be able to just upload a link or download software to have access?

Access is just a plain and simple web page. www.chassis.com. Nothing to download.

H. EXPLANATION OF “GIER” AND “IDD”

1. What is GIER?

GIER is the GLOBAL INTERMODAL EQUIPMENT REGISTRY developed by IANA.

Each unit of IME must identify the IEP by its legal or trade name and USDOT number. Section 390.21(g)(4) previously offered an IEP four options for identifying its IME; however it was recently established that the Global Intermodal Equipment Registry (GIER) is an additional method endorsed by FMCSA.

GIER is an industry-sponsored virtual technology alternative to the intermodal equipment marking options that were mandated in the Section 390.21, Part 390 of the final “roadability” regulations issued under Docket No. FMCSA-2005-23315.

Using the existing unique alpha-numeric control numbers (currently appearing on equipment), GIER correlates your equipment to the newly required intermodal equipment provider (IEP) DOT number.

2. What is the IDD ?

IDD is the INTERMODAL DRIVER DATABASE developed by IANA.

This database identifies the driver, the company he is working for, and several items of identification for that driver. This system will act as the electronic signature for a driver by use of a person and company specific pin number.

3. Why register the IEP equipment in GIER?

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Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

GIER saves cost by using technology to avoid the physical capturing and remarking of intermodal equipment to meet the regulatory requirements.

GIER also provides the critical IEP information needed to enable electronic processing of Driver Vehicle Inspection Report(s) (DVIR) in order to meet the FMCSA regulations.

The general public will have free access to the GIER database via a web page to query the identification of who the IEP is for an individual chassis.

4. How much does GIER cost?

The development, maintenance and support of the GIER application are supported through equipment registration fees as detailed in the GIER Master Agreement.

The IANA Board of Directors, for any given calendar year, will determine the fee level.

I. HOW THE DATA IS HANDLED AND WHAT IS DONE WITH IT

1. What process is in place for the IEPs to receive the DVIRs submitted by drivers?

Each IEP is responsible to specify the process or system that it will accept DVIRs from drivers.

The Ocean Carrier Equipment Management Association (OCEMA) and some others have decided on a common solution to receive DVIRs for their own equipment. OCEMA has licensed Chassis.com by Advent, Inc. to provide this solution. Chassis.com will be the largest common solution to DVIR reporting in the U.S.

The new FMCSA Roadability Regulations require the motor carrier or driver to provide the Intermodal Equipment Provider (IEP) with a Driver Vehicle Inspection Report (DVIR) describing the presence or absence of defects or deficiencies in intermodal equipment being returned to the IEP. The IEP must have a process or system to receive the report from the motor carrier or driver.

OCEMA recognized the need to establish a common process that would facilitate the DVIR reporting by the motor carriers while minimizing gate congestion and the need for multiple new systems. OCEMA has developed a system that has standardized the process to receive DVIRs for its members and other IEPs.

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Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

Using Chassis.com, a driver will be able to submit the DVIR through a web portal, EDI from the motor carrier's own systems, or from a third party service provider. Chassis.com will then forward DVIR data to the appropriate IEP, receiving facility and/or M&R provider to facilitate further inspection and maintenance of the equipment.

2. How will IEPs be informed of DVIRs?

IEPs can have the DVIR with reportable component defects sent to them as an x12 EDI 322 record and/or via email, and will have Chassis.com hold the DVIRs on its behalf. IEPs may choose and change their method of receipt within Chassis.com. Upon registration, each IEP can determine its own communication method and addressee.

Chassis.com will have a table of facilities for each IEP with contacts and communication methodology for DVIR reporting. Each IEP will be provided access to its own table of facilities and the IEP is required to maintain the table. If an IEP wants an M&R provider to receive a message of a DVIR with a defect, the IEP will need to designate the addressee and method of communication on the facility table.

3. How long will DVIRs be held in Chassis.com?

DVIRs will be held for at least 90 days or as otherwise required by the roadability regulation.

4. What will Chassis.com do with the DVIRs?

Chassis.com will provide a communication via EDI x12 351, x12 322 or email to the facilities and M&R vendors of any equipment with reported defect. Chassis.com will send Hold messages to designated parties, but it is the IEPs responsibility to ensure the parties are designated to receive the holds and that they are managing them appropriately. IEPs and their agents (facilities or M&R providers) are responsible for ensuring that they have adequate procedures in place to manage equipment with reported defects.

5. Will Chassis.com match the certification requirements of the DVIRs with defects against repair records?

No, it is the responsibility of the IEPs to match the DVIR with defects to the subsequent maintenance or inspection records. Chassis.com will not provide this matching function as part of DRS.

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

6. What happens if the IEP does not want to repair, such as off-hire, or sale?

The repair on the defect does not have to take place. 1) A qualified M&R provider could inspect the unit and determine that no repair is necessary 2) The unit could be sold or sent into long term storage etc. Or 3) It could be moved off the terminal on a flatbed. There is no time frame for the inspection/repair to take place as long as the unit does not hit the street without an inspection or repair.

J. HOW THE MOTOR CARRIER/DRIVER SUBMITS A DVIR/DVER

1. How does the driver or motor carrier report a DVIR?

Once registered, there are three ways to transmit a DVIR.

Web Portal – Chassis.com will have a web entry page at chassis.com that a driver or the motor carrier dispatcher/office staff can use to enter the DVIR on-line. This reporting process should take less than 30 seconds.

On-board Console or Motor Carrier System – Drivers with on-board consoles in their cab or with a system that can send DVIRs can transmit DVIRs to Chassis.com through EDI. The message set will be in an EDI x12 322 format that is specified on the web page chassis.com. The motor carrier will need to contact Advent to set up the communication.

3rd Party Provider – Drivers can contract with 3rd party providers who offer other reporting solutions to have a DVIR sent electronically to Chassis.com. The message set will be in an EDI x12 322 format that is specified. For example, third party services may offer SMS TXT or IVR options for the drivers to input a DVIR and then the provider sends the DVIR via EDI to Chassis.com.

2. How does a driver know who the IEP is, and which method of reporting DVIRs should be used?

It is expected that most equipment will be registered through GIER and not have physical markings of the IEP DOT# on the equipment. GIER will allow single entry queries for identifying the IEP of a chassis.

Since the identification of the IEP for each IME is not required by the regulation until December 2010, the driver will likely not know who the IEP of the chassis is.

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Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

The motor carriers will need to know the procedures defined by each IEP for reporting DVIRs. They may vary by IEP for the same facility. The Chassis.com approach is trying to address this issue through offering one common reporting method for all participating IEPs, return facilities and regions.

3. Why are there two reporting options for inspections in chassis.com?

DVIRs when returning equipment: Drivers are to report any **known defects while operating** the unit to the IEP. DVIRs do not require a separate “inspection” by the driver.

Not relating the regulations, chassis.com allows the entry of a Pre-Trip inspection as a convenience for the driver who wishes to record that information. This report is not a DVIR. Local facility procedures will prevail with the driver reporting defects to the M&R provider, going to a roadability repair area on terminal or asking for a replacement of the defective equipment. Drivers must not accept chassis with defects. It is illegal for drivers to operate equipment with known OOS defects.

4. What proof does the driver or motor carrier have that the DVIR was reported or received?

After input of a DVIR, Chassis.com will provide a unique confirmation receipt to the driver or Motor Carrier. The confirmation message will either be an EDI message, or an online confirmation number. Included in the confirmation will be the content of the reported DVIR. Any validation errors such as invalid driver identification, invalid DVIR formatting, and unregistered chassis number will result in rejection of the DVIR.

5. Why was this web based solution chosen and developed?

The regulation states that the IEP is to determine the process and system for receiving DVIR reports from the drivers. If an IEP does not designate a facility as its authorized agent to receive DVIRs then the DVIR at the gate is not following the defined process.

The OCEMA Lines agreed to establish one consistent process. That process is paperless. Since over 70% of all their gate activity is at ocean terminals, and they wanted to avoid adding a paper process and gate congestion to the 60,000 gate moves per day they have. There are approximately 1,000 facilities performing M&R with OCEMA IEPs in the U.S. One common approach was taken for all inland and ocean locations.

The OCEMA sponsored solution for reporting DVIRs is via the web site chassis.com or EDI to that site. The virtual solution avoids adding additional processes at the terminal gates where thousands of out gates happen per terminal per day and could otherwise create a major bottleneck.

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Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

6. I have a questions concerning reporting of the DVIR to Chassis.com. On the methods of reporting what is the “console method”?

Console method was mentioned in reference to when drivers have on board electronics in their cab (e.g. Schneider drivers have in-cab electronics).

7. Will there be some type of electronic form? Our drivers do not have the ability to file the necessary DVIR so our operations staff will file the form.

The format will be simple on the web page for input. You can make your own template to follow the web page if you like. The only data elements should be driver PIN, chassis number, defect (select from nine) or not, returning facility, and date.

The establishment of a smart phone accessible web entry is under development.

8. When you say that "the IEP receives the DVIR only upon the end of a chassis trip usage" how is our driver suppose to use this "Web Base Application" in his truck when he returns the chassis at the end of trip usage?

If the driver does not have access to the internet, it is suggested that the dispatcher or office clerk can input the DVIR on the web page for the driver, or, you can contact a service that provides SMS TXT from the driver into an EDI format, or, an EDI message can be sent from the motor carriers own system to Chassis.com (some drivers have in-cab electronics).

9. Since container depots and rail facilities are not considered IEP's, will their procedures change upon equipment being interchanged inbound?

The in-gate process remains as is today through the Chassis.com approach. The only change for facilities is the procedure for applying gate holds from the request of an IEP who received a DVIR with a defect.

10. How would all involved know that a trucker/driver followed procedures of the DVIR Receipt System and updated this information through the web before inbound interchange?

A unique receipt will be provided for any DVIRs received by Chassis.com. There will be no validation of the status of the units reported.

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

11. Will the IEPs participating in Chassis.com receive DVIRs at the in-gate?

Unless specific exceptions are defined by the IEP, the defined process for reporting of DVIRs from the drivers to the IEPs is through Chassis.com. Facilities are neither required, nor expected to allow, DVIR reporting at the in-gate, unless an IEP specifically authorizes it.

K. RECEIVING LOCATIONS FOR DVIR'S

1. Will Chassis.com information be location or region specific?

Chassis.com will be facility IEP specific. There will be a regional summary of return facilities and by type (rail, CY/Depot or water port) to choose from.

L. THE ROLE OF A DEPOT, M&R VENDOR, RAIL RAMP AND MARINE TERMINAL

1. What is required of facilities?

Facilities are encouraged to ask their non-OCEMA customers to subscribe to the Chassis.com in order to avoid the inconsistency of varying DVIR collection methods.

Depending on each IEP's operation at a specific facility, Chassis.com will send a hold message to the facility operator and/or M&R provider when a chassis defect is reported on a DVIR. Facilities able to receive EDI holds will receive an EDI x12 315 or x 12 322 record. Facilities not capable of receiving the EDI message will receive an email. EDI formats and setup instructions are published on the web page chassis.com.

Facilities are required to Hold the chassis and not allow it to leave the facility until the IEP or its agent advises the facility that the chassis can be released.

2. What if a facility cannot receive an EDI gate hold, or cannot place holds on units?

In those facilities where Holds are placed by M&R providers, a message will be sent to the M&R provider.

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

Facilities and/or M&R providers are expected not to tender chassis with Holds to drivers so measures should be taken to ensure chassis with Holds are somehow separated or identifiable for drivers.

3. Once a unit a defective unit is requested to place on hold at a facility, how is it released from hold?

The processes to inspect, repair and release Holds at facilities on defective equipment are the responsibility of each IEP.

4. Anything else a facility needs to do with Chassis.com?

Facilities whose customers use Chassis.com for DVIR collection will need to register with Chassis.com so that messaging (including EDI, fax, or email) relationships can be established.

5. How is communication with facilities, IEPs and M&R providers maintained?

IEPs are responsible for registering and populating and performing system maintenance of the facilities they use, the communication parties and methods of communication to be used.

6. What does the M&R Provider need to do?

Each IEP should coordinate with its M&R provider at each facility to ensure that the equipment is placed on hold (if facility operator cannot do it) and that the unit is inspected and repaired as necessary. The procedures are IEP/M&R provider specific.

7. Does the M&R provider need to certify the repair on the original DVIR?

Although the regulation states this requirement, in the age of modern technology the FMCSA has agreed that electronic record keeping of DVIRs and repair records meet the obligation.

8. What assurance do we have that we will have the information prior to the equipment arriving at our facility?

We are asking the drivers to report the existence or absence of defects prior to in-gate.

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

9. Will the driver have a copy to turn in at the time if the interchange?

We will issue a DVIR receipt to the driver/motor carrier when the DVIR is recorded in our system. The driver will not be forced to present the DVIR or receipt number at in-gate. Since the relationship is between the IEP and motor carrier, there is only one reason for the facility to be aware of the DVIRs - that is to assist the IEP by applying a gate hold when there is a defect.

10. As a CY/Depot how are we to report the chassis inspection information to the equipment provider that we receive from other motor carriers?

The receipt of DVIRs at the facility gates is not following the (Chassis.com participant) IEP defined procedure. The reporting at the gate can be considered an enhanced inspection to your normal in-gate inspection process. If there is any hint of a defect affecting the safe use of the equipment, you put the unit on hold pending follow up by the repair provider.

M. WHAT HAPPENS WITH A SUBMITTED DVIR ?

1. Will Chassis.com information be sent to a facility for a defect free chassis?

DVIRs that are defect free will not be sent to the facilities. The assumption is that if a unit in-gates and there is no defect pre-reported, then there is no defect. This regulation is adding supplemental documentation to today's practices. No one should be letting unsafe equipment out on the street, and drivers should be reporting defects when known.

2. Does the driver report daily DVIRs to the IEP?

How the driver reports his "daily DVIR" to the Motor Carrier is the motor carriers concern. The single end of a trip DVIR that is reported to the IEP for the IME of Chassis.com participants is via their web page (chassis.com) or via electronic interface as explained earlier.

3. Who will maintain the DVIR records?

Chassis.com will receive the DVIR's for the IEPs and store them at least for the regulatory time limit (3 months). All IEPs will receive the records and are encouraged to

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

match the certifications of the repairs to the DVIRs that have defects (in their own system).

- 4. What is the exact technical specification of the EDI x12 315 and x12 322 dataset you plan to use to transmit chassis hold/deadline requests?**

Details are posted on the EDI tab of Chassis.com.

- 5. Will you be sending DVIR cancellations? If so, please submit the exact technical specification of that dataset.**

No cancellations will be sent.

- 6. Will your DVIR EDI 315 322 s differentiate between our various terminals: Wando, North Charleston, and Columbus Street?**

One trading partner can manage multiple facilities. The facility will be identified in the 322 or 315.

- 7. How will data be handled for co-located facilities with different operators? That is, how will chassis.com differentiate between the common user and other yards?**

Each terminal operator can be setup as a trading partner.

- 8. If a chassis is already on terminal when a DVIR EDI 315 is sent, does the chassis need to be held/deadlined at that point?**

Yes

- 9. Will you only be sending EDI x12 315 or x12 322 messages (to facilities) for chassis that need to be held/deadlined? Will you send EDI x12 315 or x12 322 DVIR messages for any other reason? If so, what are those reasons and how do we differentiate?**

Messages will only be sent for DVIRs with defects. Defect codes will be included in the 322 but how you manage that data in your system is up to you.

- 10. Will you use file transfer protocol (FTP) to transmit this data to us or will your data come through an EDI value added network (VAN)?**

Frequently Asked Questions
Roadability Regulations for Intermodal Equipment and
DVIR Receipt System

FTP will be the protocol. Chassis.com will not “push” any files to trading partner FTP sites. All files will be “pulled” from chassis.com. FTP details will be provided in the EDI registration.

11. On what interval will DVIR EDI 315 or 322 messages be sent?

Outbound messages will be generated on a 15 minute interval.

N. HOW THE PRE-TRIP IS HANDLED

1. What documentation is required for the pre-trip inspection?

Besides the driver’s requirements to retain the pre-trip information for its own use, the IEPs do not require any reporting of the pre-trip inspection. However, chassis.com offers a pre-trip inspection form for the driver to enter this information and retain it in their account for reporting purposes.

2. Can a driver report a DVIR defect at the out-gate from a terminal?

A DVIR is not for a pre-Trip.

A driver can enter a defect for a pre-trip inspection; however the driver must not accept this equipment in defect order. Any defects discovered through a pre-trip inspection should be brought to the IEP or IEP agent’s attention for addressing. The IEP is responsible to provide a process to repair the defects on the equipment or to provide alternative equipment.

The out-gate interchange acknowledges that the driver accepted the IME with no known defects.

O. FURTHER QUESTIONS

1. What if I have further questions?

We will strive to update the web page with the most current information. Specific new questions can be addressed to DRS@ccmpool.com.