

Remarks of Richard Chriss, Executive Director of the American
Institute for International Steel

At the

Federal Maritime Commission Forum on International Supply Chain
Efficiency and Effectiveness: Challenges Facing Gulf Coast Ports

Port of New Orleans
November 3, 2014

I would like to thank the Federal Maritime Commission, and particularly Commissioner Dye, for convening this important public forum.

I very much appreciate the invitation to participate, and to engage in a broad discussion of ideas.

With that, I would like to briefly introduce myself. I am currently completing my first year as the head of the American Institute for International Steel. Prior joining the AIIIS, I served for six years as Assistant General Counsel and Chief Agriculture Counsel with the Office of the United States Trade Representative, where I had the honor to represent the United States in various trade negotiations around the world, at the World Trade Organization in Geneva, and elsewhere. I also served as Senior Counsel to the Under Secretary for International Trade at the U.S. Department of Commerce, and as an International Trade Counsel for the U.S. Senate Committee on Finance.

The AIIS is a unique organization due to its diverse, comprehensive character. Our 100 members comprise virtually every aspect of the steel supply chain—shippers, traders, stevedores, importers, exporters, major port authorities--including several of the great port authorities represented here today, including the great Port of New Orleans--producers, service centers, railroads, trucking companies, customs experts, and others.

Every day of the year, the men and women who are part of the AIIS family load steel on and off ships, handle and store it on our docks, transport it across oceans and waterways, in trucks and rail cars, and much, much more.

The subject of today's forum-- improving the efficiency and effectiveness of our global supply chains--is an exceptionally important and timely topic. In many ways, it is one of the most critical and relevant trade-related issues of our time. The 160 member nations of the World Trade Organization (WTO) recognized the compelling linkages between competitiveness, trade facilitation, and global supply chains when last December they took a consensus decision to agree to a new multilateral Trade Facilitation Agreement, the first successfully concluded agreement in the WTO's 19-year history. Most unfortunately, implementation of this historic agreement is being held up by one country—India—over an unrelated matter relating to food security, even though India favored the agreement in the first instance.

Recent significant, comprehensive studies by the World Bank, the World Economic Forum (WEF), the Organization for Economic Cooperation and Development (OECD), and others, affirm the tangible economic benefits of efforts to facilitate trade—to make trade simpler, easier, faster, and less expensive. Improving the efficiency of our global supply chains goes hand-in-hand with the global effort to facilitate trade.

I believe that this session will help serve the essential goal of broadening and deepening our understanding of what concerns our efforts should address, and how these efforts should be organized, both on a policy and a practical level.

There are meaningful policy and the practical dimensions of this discussion. I would like to start with a quick look at a broad policy framework, then focus on some practical issues that flow from this broader context.

With regard to the policy framework, recent research has shown that the central factor for the ability of a country to participate in supply chains is the competence of local trade facilitation and logistics services. In competitiveness terms, research shows that lack of efficiency in local trade facilitation and logistics proficiency is equivalent to an additional tax. For several years, the World Bank has developed and published a Logistics Performance Index (LPI) of six criteria for about 150 countries. These criteria serve as an international “scorecard” to rank countries’ logistics performance

based on six key dimensions to demonstrate comparative performance in logistics.

The six criteria in the Logistics Performance Index are:

- 1) Efficiency of the clearance process (i.e., speed, simplicity and predictability of formalities) by border control agencies, including customs;
- 2) Quality of trade and transport related infrastructure (e.g., ports, railroads, roads, and information technology);
- 3) Ease of arranging competitively priced shipments;
- 4) Competence and quality of logistics services (e.g., transport operators, customs brokers);
- 5) Ability to track and trace consignments;
- 6) Timeliness of shipments in reaching destination within the scheduled or expected delivery time.

Let's take a look at how the United States fared in this analysis:

Overall, the United States ranked 14th in in logistics performance, behind countries like Denmark, Belgium, the United Kingdom, Japan, Germany, Canada, and Ireland.

In ease of Customs clearance, the United States ranked 19th, in ease of shipment, 20th, in logistics services, we ranked 14th, in timeliness of shipments we ranked 18th, and in domestic logistics costs, we ranked a dismal 144th out of 150 countries.

As a former trade negotiator and U.S. trade official, I know that the United States does a lot of things very well in terms of successfully advancing open markets. But with more and more of the world's goods and services moving in international commerce, we clearly have work to do if we want to be in top competitive form in an increasingly highly competitive world.

How do we begin to do this, and where does this work start?

I might suggest, Commissioner Dye and colleagues, that we start with this forum, but recognize that this is only a start— we should take the insights and guidance developed here and use them as a baseline, that is, we should broaden and deepen the conversation started here, and carry it forward throughout this coming year, and the years after that, especially in light of the major trade policy developments on the horizon, such as the prospect of a successfully completed Trans-Pacific Partnership regional trade agreement.

As we know, a successfully concluded TPP agreement may, at some point, become more than a regional trade arrangement for the current 12 nations participating in the talks. The TPP may become a platform for a broader, hopefully even more comprehensive, regional economic cooperation regime.

By itself, a successfully concluded TPP agreement will likely present new challenges and opportunities for the United States, and for the

Gulf region, given the enormous significance of our Gulf region ports to our export and import -dependent economy.

The new trade relationships and trade patterns that would flow from a broader TPP-based trade platform would likely have even more significant consequences for the economy of the Gulf region, and we should start to think now about and prepare for these developments by taking a clear, hard look at the Gulf region's trade-related infrastructure, our Customs procedures, our supply chain logistics services and performance, the availability and the quality of transport services, and the other factors addressed by the World Bank study—and by other international and domestic entities.

One of the reasons I would suggest the World Bank's analytic framework is so useful is because it does something suggested in a 2012 World Economic Forum analysis of the logistics and supply chain industry—it “unpacks” the sources of potential supply chain costs, and allow us to target them as areas that will yield immediate improvement.

Here I would like to focus on practical issues and discuss briefly one of the supply chain costs adversely affecting our regional and national competitiveness: the lack of sufficient truck availability to either catch cargo in direct discharge, or to catch cargo for movement to a temporary storage facility within a port.

The availability and quality of inland transport of cargo is such an enormous factor affecting trade growth through our ports.

This is not just a Gulf port problem, it is a national problem.

Some reports indicate that we have 30,000 fewer truck drivers than we need. The American Trucking Association expects the estimated U.S. truck shortage to swell to 239,000 by 2022.

The costs associated with insufficient truck capacity cascade throughout the steel supply chain: there are increases in port charges, costs associated with the delay in delivering the cargo to the final customer, such as interest costs due to invoicing and payment delays, and, of course, disgruntled customers and their costs for delayed production.

It is practical issues such as this that help explain how the United States ends up with an overall Logistics Performance Index score of 14, an ease of shipment score of 20, and an even worse LPI ranking of 144 out of 150 for domestic logistics costs.

The good news is that this and related issues are not intractable problems. We know that things like improved transportation capability, human capital improvements like upgrading manpower skills, and innovation like new information and communication technology, all facilitate the movement of trade through our ports.

We look forward to addressing these and related concerns with the Commission in the future, and to being part of the solution.

On behalf of the AIIS and our extraordinary member companies, organizations, individuals, and partners, thank you again for the honor to contribute to this public forum.

Thank you Commissioner Dye for the opportunity to address the FMC on international supply chain efficiency, port congestion issues and industry challenges that all stakeholders are wrestling with in today's logistics supply chain. I am Jim Michalski VP of Inland Operations at CMA CGM (America) domiciled in Norfolk, Virginia.

My entire career has been within this industry and I have seen my fair share of operational challenges. After spending nearly 25 years on the ocean carrier side of the transportation industry, nothing has quite prepared me for the challenges we are facing today. As everyone here knows, the smallest bit of congestion at the port has a trickledown effect throughout the intermodal chain. Even brief periods of congestion can lead to days or weeks of recovery. With the sustained congestion we have seen this year, the supply chain is seriously at risk of grinding to a halt which will impact our economy. I think all of the stakeholders here today know that I'm not exaggerating or being melodramatic when I say that the challenges we are discussing today have reached crisis level.

I have followed the previous port congestion forums with great interest, and I appreciate Commissioner Dye and the other commissioners providing these opportunities for public discussion. Unfortunately, it seems to me that at the previous meetings many stakeholders have been too anxious about their own point of view and not working collaboratively with other stakeholders. To quote Pogo: "we have met the enemy and the enemy is us," all of us. We need to stop working against each other for our own interest and come together on solutions. I recognize that each stakeholder here today has competing priorities; but at the same time, I hope we can agree that we each need to make a profit in order to build infrastructure and reinvest in our individual organizations for sustainability.

With that in mind, I'd like to highlight a few areas where I think investment is the key to resolving the current crisis.

Port Authorities need to invest into capital infrastructure to ensure competitive capabilities and to develop jobs in each of their states. The large capital investments necessary to develop facilities have been slow to develop and are currently behind the industry demands. We hear a lot from East Coast port

authorities and politicians about the introduction of “big ships” after the Panama Canal expansion. That can’t happen without critical infrastructure development, starting with the ports.

Terminal Operators need to invest in container handling equipment to ensure they can grow their operations to eliminate congestion and empty container rejection. They also need to invest in necessary resources to timely repair chassis in terminals that are perceived to have more equipment out of service than in service. Terminals cannot simply rely on solutions such as Pier pass, which have only pushed gate congestion at facilities to peak periods. Equipment investment needs to be considered in order to ease congestion and to keep the terminals fluid.

Motor Carriers need to invest in their drivers to ensure there is a future for drayage and inland trucking. Motor carriers also need to invest in equipment and taking responsibility for chassis in line with the model followed elsewhere in the world. The owner operator has been squeezed for years on rates to a point where the driver living wage is unsustainable. The driver population average age has grown from 41 to 55 over the last decade. This trend is obviously unsustainable and the entire supply chain needs some corrective action taken.

Shippers (NVOCCs and BCOs) need to invest in the service levels they demand. Shippers are demanding the best service, while driving rates down. Cargo is compressed into seasonal windows, straining peak capacity. Warehousing hours do not meet the demand of cargo surges, so shippers are holding equipment and asking for more free time. Carriers are usually willing to grant the additional free time to secure the business, but this just contributes further to the equipment shortages. The cycle of service demands and rate erosion is not stable.

Railroads & TTX need to invest in equipment and infrastructure and also look at operational practices that add to the congestion and equipment shortages. For example, the wheeled chassis operation required by railroads to minimize operational costs has a negative impact on already over utilized chassis capacity. Also, there is insufficient rail car supply in the network, causing rail car shortages and delays throughout the network. While railroads want to protect their

individual interests, over usage of rail cars by one company to protect its interest against competitors has a negative effect on supply throughout the industry.

Chassis Management & Leasing Companies need to invest in an ageing fleet in new equipment and the resources needed to timely repair equipment, as well as to reposition equipment from surplus locations. Depots are holding chassis that could be deployed to mitigate chassis shortages in other areas. Again, this simply exacerbates to the problem.

USMX/ILA/PMA/ILWU – Cyclical availability in the workforce and stronger internal leadership in each organization is required to meet the demands of the industry. I applaud what has been done by USMX and ILA to increase the workforce in NYNJ, including the ILA effort this year to limit vacations in the North East to meet the demand of peak freight. Labor availability has notably improved over 2013, but these initiatives need to be formalized in an agreement with PMA and USMX to ensure the industry is provided with the consistent, skilled and efficient labor force for the long term. Certainty of labor supply plays an important role in the confidence of shippers and carriers alike.

Last, but not least,

Ocean Carriers need to invest in larger ships to take advantage of the economies of scale needed to provide superior service at a competitive price. At the same time, we need to exercise restraint in pricing to ensure that service levels are not eroded by declining rates. Right now, carriers are barely afloat, losing money as an industry year after year. To mitigate the bleeding, the carrier industry has adopted a slow steaming policy. This means when vessels are delayed due to port congestion, it is cost prohibitive to spend the money to make up time.

Carriers also need to play our role in equipment investment by ensuring a strong supply of containers, including specialized containers, and we need to invest our time and efforts into finding a solution for container imbalances so that the containers are not only available, but available where we need them. At the same time, carriers must continue to push for a move out of the chassis business so

that equipment can be managed more efficiently by other stakeholders who are in a better position to maximize efficiencies.

None of these issues are new to the industry, but they are exacerbated by the volume growth in the industry. I do not pretend to think that these comments are all inclusive for each of the stakeholders, but I do hope that I have identified some of the competing challenges and areas where we can reach common ground and stop working in different directions. Until we as an industry identify a common path and accept that we all need to take responsibility for a financial piece of the solution, this cyclical nature of congestion will persist and only get worse. I recommend an industry wide CEO level task force encompassing all stakeholders be formed to address the issues and work toward a common industry solution. We all know the challenges and have the power to influence the solution, but no one of us can solve it separately.

Thank you again for your time and opportunity to discuss solutions for change.

Statement of

Randy Guillot

President

Triple G Express

&

Southeastern Motor Freight

Before the

Federal Maritime Commission

At the

International Supply Chain Efficiency: Challenges facing Gulf Coast Ports

Forum

New Orleans, LA

Nov 3, 2014

Thank you Commissioner Dye for the opportunity to participate in this relevant and important Forum. International Supply Chain Efficiency: Challenges facing Gulf Coast Ports is a critical topic not only for the International shipping community but also worldwide commerce. Projections have been widely publicized that future growth of the world's chemical production will focus on the Gulf Coast region. The reason is quite simple, economical and abundant energy. The challenges to succeed with transporting these new products are many and vast; labor, environment, political regulation, infrastructure, just to name a few.

This being the fourth and final forum many comments have been filed with varied perspectives by industry experts across the intermodal spectrum. Topics such as terminal congestion, vessel bunching, infrastructure, driver shortages, chassis ownership and management are just a few that is relevant to my industry, intermodal trucking. While I could speak for hours on end about these and other troubling issues we have been asked to discuss innovative ways to:

Prevent port congestion

Promote global trade

Increase International supply chain efficiency

Some of my comments may present new ideas, most will probably not. My forthcoming comments like many in the preceding forums have been communicated for MANY years by industry stakeholders with little or no advancement. By definition, Intermodal Transportation, involves multiple modes of transportation; ship, rail, and truck. Even in its definition, truck, is last. In my speech, I will take the privilege of putting the "truck" first.

As background to my thoughts, I am a third generation trucker. My family's business started in 1945 in New Orleans and today is one of the oldest trucking companies still owned in Louisiana. We employ teamster union drivers paid by the hour. Our second trucking company utilizes independent contractors and

could be described as one of the largest serving the Port of New Orleans. Being in the business all of my life, I am probably biased but maybe, just maybe these suggestions forthcoming can be viewed as coming from a “realist”.

Please accept these comments in the spirit intended; open, honest, and with respect to other involved stakeholders who may receive negative attention. While most examples used today will involve the Port of New Orleans, my home, these examples are also true for the vast majority of Ports across America. Chassis management and utilization, Port congestion, and infrastructure are the topics I'll present today. Problems and solutions offered together.

First, chassis management and utilization is a topic weighing heavily across all regions. The United States is trying to evolve from a steamship owned and controlled system unique to only the U.S. to one preferred in the rest of the World where motor carriers provide chassis. The problem is, the steamship industry won't “get out of the way”. As they are departing, or trying to, they are also dictating the terms of the transition. In most circumstances, the ocean lines are negotiating terms of chassis sales and future leasing arrangements. While in principle this may seem appropriate, in reality the terms in my opinion are criminal. Trucking companies are being forced to use chassis providers dictated by the ocean line and overcharged while doing so. Concessions are given to the ocean carrier that negotiated the deal in exchange for the lease revenue generated. Open choice is not an option, free marketplace does not exist. Motor carriers and the shipping public lose all control of an expense they incur.

The solution is simple, open choice for all chassis provisions. Motor carriers and shippers should select and negotiate their terms between each other and between chassis providers. In addition, I believe all chassis should have tubeless radial tires, led lights, and updated brake systems. All chassis should be available in roadworthy condition upon driver arrival not requiring them to position chassis within a terminal to its mechanic area then wait on repairs. These two issues are

intertwined by the fact that a better spec'd chassis will not require the volume of ongoing maintenance happening today. This policy will also help terminal congestion by not having such a large inventory of unusable chassis taking up space waiting on mechanics to repair. It also allows for the maintenance expense of a chassis to follow through to the owner of the chassis. ALL maintenance and repair should be built in a daily use price, similar to the "rental car" system widely used around the country. Competition, choice, quality of product, safety oriented chassis would be the standard not the exception as is today.

Port congestion is problematic across all regions, all Ports, and all facilities. Some may define congestion by time, some by number of turns in a day; some may even measure by revenue lost. By any description, it's not good and it's not getting better. Here are a few "best practices" that should be employed universally.

One multiuse chassis pool should be the standard even if multiple equipment owners supply the pool. As example, New Orleans Port has one container facility. Within the perimeter, two terminal operators are tenants. Each operator has its own chassis pool which is operated by the same chassis management company CCM. Trucks servicing both facilities in the same day have to exit and reenter the same gate, drop and swap chassis, traverse a Port dedicated road, and information entered by trucking companies in two separate systems. All of which is counterproductive, costly, creates a safety exposure, and environmentally irresponsible.

Extended work hours are a must. Many shippers and motor carriers work 24/7. Most Port facilities are located in areas of urban congestion that are inherently difficult to access during daytime hours. Whether terminal operators can adjust existing staffing to extended hours for minimal additional expense or adding man hours for longer and better performance, this "best practice" is a must. Ways to finance cost can vary from shippers, Ports, steamship lines, truckers, or governmental agencies.

Another suggestion to improve Port congestion involves a very sensitive topic, Labor. Ports across the nation are burdened with underproductive employees carrying high payrolls. Truck drivers are often treated poorly, delayed intensively by willful misconduct, and overall not being respected as a valuable asset in the intermodal chain.

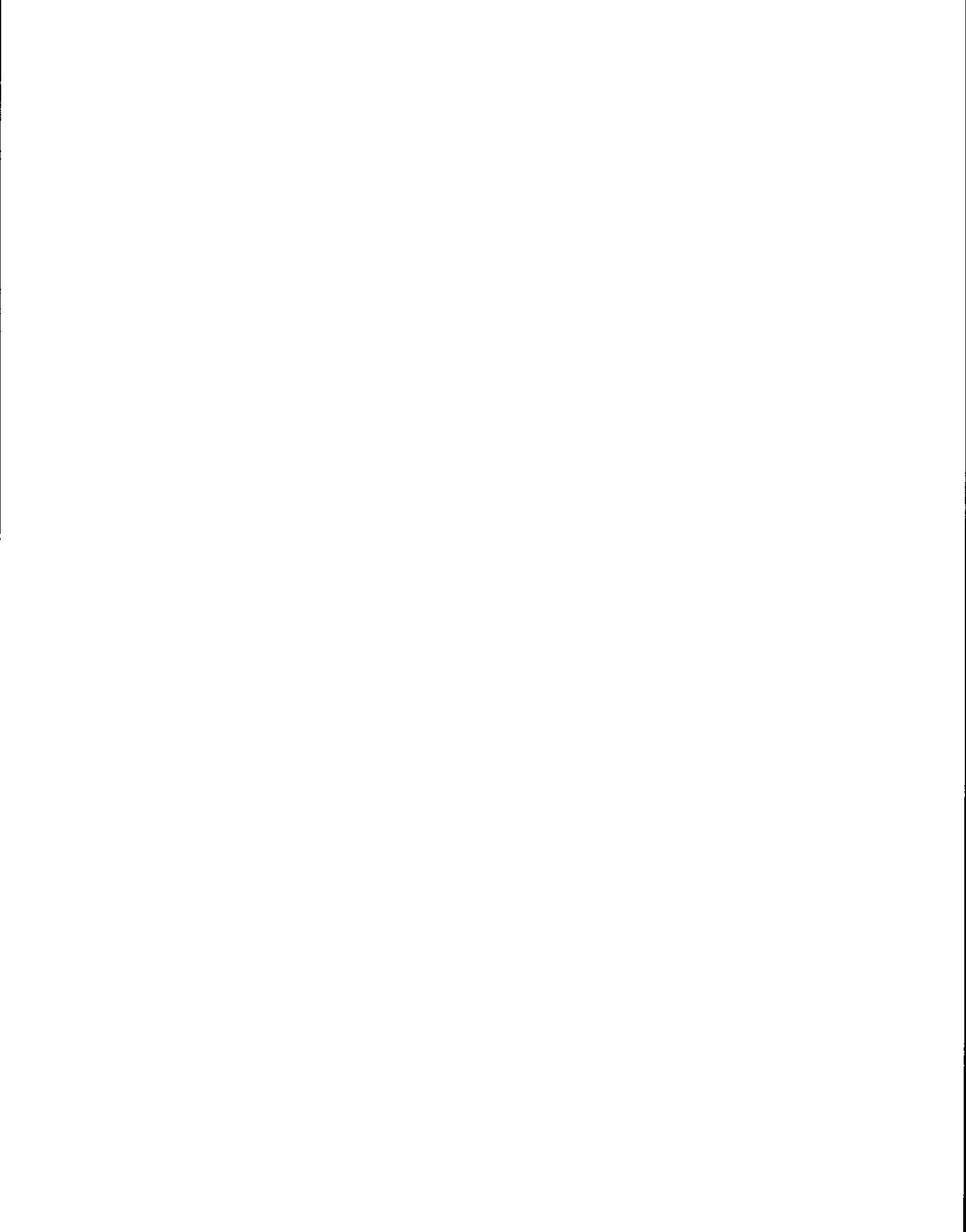
Lastly, infrastructure in the context of today's discussion can be inside a terminal, within city limits, or on the nation's most traveled highways. This issue is not cheap and answers are not glaringly obvious. Problems can be seen everywhere. Most critics of the trucking industry are quick to say, "put it on a train or barge it". Being a realist today, that's not going to happen! Trucks travel the first mile and they travel the last mile in today's and tomorrow's intermodal world. So let's acknowledge this problem and deal with it.

I will revert back to a previous statement made earlier to offer a partial solution, "extended work hours". The ability to use the same infrastructure over a longer period of time daily/weekly will open capacity without incurring huge road and facility infrastructure construction costs. Putting truck traffic on highways when 4 wheelers are less likely to be abundant makes our existing roads safer and more productive. Congestion within our Ports will be eased allowing for a safer workplace for dock workers and truck drivers alike.

Multiple truck routes to Ports, adequate lanes, turning radiuses, and signalization are all issues that should be recognized, addressed, and resolved. Using New Orleans as an example once more, it's hard to believe in today's economy the Port of New Orleans only has one entrance to its container facility which forces All of its truck traffic through the city's downtown most congestive area in rush hour morning/afternoon traffic. My entire career on behalf of the trucking community

I have asked for additional ingress/egress routes – to no avail. If International Commerce is as important as this City, State, and Nation has stated, make the commitment to support the infrastructure we so desperately need.

Commissioner Dye, thank you very much for allowing me to communicate issues that are so critical to the Intermodal Industry of the Gulf South.



Statement of
Brian L. Fielkow
President
Jetco Delivery, LLC
Before the Federal Maritime Commission
At The
Gulf Coast Port Congestion Forum
New Orleans, LA
November 3, 2014

Commissioner Dye, I want to thank you for the opportunity you have given us to discuss issues impacting the port drayage industry today.

My name is Brian L. Fielkow. I am the president of Jetco Delivery, LLC, based in Houston, TX. Jetco has been in business since 1976 and I purchased the business in 2006. We operate approximately 100 trucks. Our fleet is about 70% company-owned and 30% owner operator.

In addition to owning Jetco, I also speak across the country about company culture. When I speak to high consequence industries, I focus on behavior-based safety and safety culture as the best means to prevent and reduce accidents. This year, I published *Driving to Perfection: Achieving Business Excellence By Creating A Vibrant Culture*.

I am chairperson of the Texas Trucking Association (TXTA) Intermodal Committee. In this role, I work closely with the port, trucking companies and other key stakeholders. My comments today however are my own and have not necessarily been endorsed by TXTA.

1. **Collaboration** – In Houston, the trucking industry and the port are fortunate to share an excellent relationship. We speak often and hold a quarterly “open-line” conference call so that issues and opportunities may be addressed. Creating open lines of communication is the first and only way to begin to properly address the issues that affect all of us.
2. **Driver Shortage** – This is the most important issue affecting our industry. Attracting new drivers into port drayage is particularly difficult. In my view, here are the most significant issues affecting our drivers:
 - a. **Non-compensable activities** – From the time spent looking for suitable pool chassis to paperwork delays to gate delays

(measured from the time a driver arrives in line to the time he/she exits), drayage drivers spend a lot of time in non-compensable activities. As an industry, we must be sure our drivers are compensated for all activities and that the appropriate parties are charged.

- b. **Hours** – Often, local port drayage drivers have more legal driving hours available than port and warehouses are open. In Houston, working with our port, gate hours will be extended by 1 hour per weekday at two key container terminals, starting on November 17, 2014. This seemingly simple change adds 10 hours per week of production opportunity. If this change is successful, it paves the way for additional expansion of the workday. Now, it is incumbent that chassis providers, steamship lines and shipper/consignees extend their workdays to leverage this change.
- c. **Treatment** – It upsets me when one of our drivers says “I’m just a truck driver.” In reality, drivers are the backbone of our economy. Without them, nothing moves. While our industry bears primary responsibility for attracting qualified drivers, we could use help. Everywhere we look drivers are hit with difficult challenges – paperwork issues, new regulations, roadside inspections, chassis problems. While some of this is unavoidable, we as a country must show our appreciation for and attract new drivers to this noble calling.
- d. **Immediate new sources** – I suggest looking at the areas that could solve the driver shortage. First, identify and eliminate all barriers to qualified military personnel from driving after discharge. Second, it is time for a serious discussion and

resolution to immigration reform. The communities being forced to unfairly live in the shadows of our society should be granted a pathway to citizenship and opportunity. Third, if an individual commits a crime, he/she is punished appropriately; yet the punishment continues long after release from incarceration. Often, we cannot hire from the penal system due to insurance concerns or due to litigation fears of that person being involved in an accident.

3. **The chassis situation** – Most steamship lines migrated to a “trucker choice” chassis model. This means that the trucker pays for the chassis. In theory, the trucking company should be able to arrive at the port with any chassis to pick up any container. It doesn’t always work this way.

- a. If a steamship line has stopped providing chassis, they must no longer have the ability to dictate which chassis provider that the trucking company must use. Terminating one 40’ chassis for another is an example of non-compensable, wasted effort.
- b. I firmly support the development of a gray chassis pool. The “Gray Pool” model can be beneficial and help with port congestion. If a provider does not have enough chassis to cover all of a line’s containers who are still providing chassis, this could mean delays for drivers.

Where shortages of chassis exist, the drivers have the following options. One option is to get a red tagged chassis if no good order chassis’ are available. The driver must spend time getting repairs done before they can exit the port. Red tagged chassis and timely repairs should be the responsibility of the chassis

provider. The job should not be pushed onto the drivers to go to M&R thus causing driver delay.

The second choice is to wait until a driver shows up who is turning in a pool chassis. Those delays can be lengthy. Again, that is time that a driver does not get compensated for and further frustrates drivers.

4. **Infrastructure** – “No new taxes” is irresponsible when it comes to developing a vibrant multimodal infrastructure. This is particularly important in a state like Texas, which is benefitting from rapid growth. I support increasing and indexing the fuel tax as the most equitable means of building and improving our roads. We also need to think long term about our needs. We can no longer wait for highway funds to run out, pass an emergency funding bill and then ignore the issues until funds run out again. This is a long term national issue and must be treated as such, without partisan political concerns.
5. **Safety and regulations** – Let me be clear – I believe that nothing is more important than safe operations. No load is more important than the safety of the public and my employees. However, we must come to the realization that a flood of unnecessary regulations will not automatically make us safer.
 - a. I recommend that the FMCSA devote some of its resources to helping trucking companies institute behavior-based safety programs. Many companies desire to improve and simply need the tools.
 - b. The new hours of service rules (effective 07/2013) have adversely impacted production without any measurable impact

on safety. I support proposals to suspend the new HOS rules and replace them with the rules which were previously in effect until a rational review can be completed.

- c. When we pull containerized cargo, the driver does not have the ability to inspect the cargo unless he/she breaks the door seal. There are legal implications to breaking a seal. Shippers and their domestic agents must be held to high standards when packing cargo for import or export. The consequences of a load shift can be devastating.
- d. Some jurisdictions allow drayage companies to pull heavy containers (GVW>80,000 pounds). Others, such as mine, limit weights to 80,000 pounds (84,000 pounds with permit and no interstate travel). I see both sides of the argument. Where heavy container debate does occur, please keep the following in mind:
 - i. Proper number of chassis axles to accommodate weight
 - ii. Fairly priced permits to pay for wear and tear on the roads
 - iii. Driver training – hauling 100,000 pounds is much different than hauling 80,000 pounds (brake time, etc.)

Heavy containers may have tremendous benefit by allowing shippers to increase payloads. Theoretically, we can haul more cargo with fewer drivers. That said, safety concerns must be paramount in the decision making process.