

SUBMITTED FOR INCLUSION IN HEARING RECORD

TESTIMONY OF

Anne C. Reinke
President and CEO
Intermodal Association of North America (IANA)

REGARDING

America Builds: How Trucking Supports American Communities

BEFORE

The House Committee on Transportation and Infrastructure
Subcommittee on Highways and Transit

MARCH 26, 2025

On behalf of the Intermodal Association of North America (IANA), thank you Subcommittee Chair Rouzer, Ranking Member Norton, and Subcommittee Members for convening this hearing to discuss U.S. Department of Transportation (USDOT) policies and programs impacting the trucking industry.

As the only transportation trade association that represents the combined interests of intermodal freight providers and customers, IANA represents more than 1,000 corporate members, including railroads, ocean carriers, ports, intermodal truckers and over-the-road highway carriers, intermodal marketing and logistic companies, and suppliers to the industry. IANA's associate (non-voting) members include shippers (defined as the beneficial owners of the freight to be shipped), academic institutions, government entities, and non-profit trade associations.

Unlike single transportation modes, global and domestic intermodal freight supply chains are comprised of separate entities that work together to complete each intermodal movement. Truck movements are an essential link in the intermodal supply chain and each container's journey requires multiple drivers to complete a combined total of 98 million intermodal trucking moves annually.

Recognizing the broad range of issues under the Subcommittee's jurisdiction, IANA looks forward to working with you to advance policies in the next surface transportation authorization law that increase intermodal supply chain efficiency, support the industry's essential workforce, and foster economic growth and competitiveness. An overview of the Association's most pressing policy principles related to trucking can be found below.

Workforce

Based on a 2022 study by the American Trucking Associations (ATA), the trucking industry is facing a shortage of nearly 80,000 drivers. ATA further projects that the industry must recruit roughly 1.2 million new drivers over the next decade to replace an aging workforce and keep pace with growing freight demand. Given these estimates, IANA encourages Congress to advance legislation that supports the retention of the existing trucking workforce, reduces regulatory burdens, and incentivizes new drivers to enter the industry.

Presently, drivers must be at least 21 years old to operate a commercial motor vehicle (CMV) in interstate commerce. This age barrier serves as a deterrent for 18-to 21-year-olds who are interested in entering the workforce. Frequently these individuals undergo training and apprenticeship in other fields before their age qualifies them to operate a CMV in interstate commerce. IANA supports federal efforts that would allow drivers between the ages of 18 and 21 to enter the interstate workforce, while maintaining safety objectives.

The Infrastructure Investment and Jobs Act (IIJA) took a critical step in creating a career pathway for the next generation of interstate CMV drivers by establishing the Safe Driver

Apprenticeship Program (SDAP) under the Federal Motor Carrier Safety Administration. The pilot program allows qualified younger drivers to operate in interstate commerce and ensures participants satisfy comprehensive training and safety standards. Unfortunately, the addition of extraneous requirements, beyond what is written in law, has hampered participation in the program by both motor carriers and drivers. To maximize the potential of the SDAP and the future trucking workforce, we encourage Congress to build on its important work under the IIJA by steering the program back on course and ensure it is implemented according to Congressional intent.

Another top priority for the intermodal industry is to preserve the independent contractor model, which allows truck drivers to enjoy maximum flexibility by choosing the hours and routes that best align with their personal circumstances and preferences. While not directly under the Committee's jurisdiction, we hope to count on your support for this important issue that stands to impact approximately 400,000 independent truck drivers and an estimated 80 percent of the intermodal drayage trucking workforce. Although employee driver positions are readily available, these individuals have made the conscious decision to carry out their work as independent owner-operators – investing time and financial resources in their small business, which includes training, regulatory compliance, licensing, insurance, and the purchase of a truck. To further the trucking industry's workforce recruitment and retention goals, IANA opposes any efforts that would eliminate or restrict the independent contractor model.

Truck Size and Weight

In 1991, Congress froze truck size and weight limits on federal highways. The intermodal industry wholly adopted this standard and, accordingly, built trailers and containers in compliance with federal law. Any changes to these long-standing regulations will upend intermodal operations, sending a ripple effect across the entire supply chain as intermodal equipment is carefully designed for safe and efficient transport by water, rail, and road.

Side Underride Guards

IANA remains concerned about efforts by the National Highway Traffic Safety Administration to implement side underride guard mandates for trailers, semitrailers, and chassis. Safety on our nation's highways and that of the motoring public is, and always will be, a priority for the intermodal transportation industry. Notably, inspection and repair procedures for intermodal chassis are well-established and maintained throughout the country. According to chassis lessors, no fatalities have been identified over the last five years from side underride incidents involving intermodal chassis. However, the application of a side underride requirement on chassis would pose significant physical and operational issues at every major port and rail terminal in the United States. For example, side underride guards would make it impossible to stack inverted chassis, limit available yard storage space, restrict intermodal movements due to the additional weight of the guards, and substantially increase costs for supply chain

entities as well as consumers. IANA urges the Subcommittee to oppose harmful regulations – such as a side override guard mandate – that are not supported by economic, operational, and safety data.

Intermodal Connectors

Despite constituting less than one percent of total National Highway System (NHS) mileage, NHS-designated intermodal connectors play an outsized role in freight network fluidity. These connectors provide necessary links to seaports, rail facilities, and airports that allow for seamless interaction between transportation modes and are essential to the movement of goods between points of origin and destination. According to a 2017 study by the Federal Highway Administration, only nine percent of intermodal connectors are classified as in good or very good condition. Under the next surface transportation reauthorization, IANA strongly supports continued eligibility and robust funding made available for improvements to intermodal connectors under federal formula and discretionary programs.

Thank you for your time and your leadership in support of intermodal goods movement and its related issues. It is our hope that IANA can be a resource as Congress continues developing reauthorization legislation. We look forward to working with you and would welcome the opportunity to further engage with your offices. If you or your staff have any questions, please do not hesitate to contact me at areinke@intermodal.org or 301-982-3400.