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March 27, 2026

Hon. Laura DiBella
Chairwoman
Federal Maritime Commission
800 North Capitol Street, N.W.
Washington, D.C. 20573

RE: Investigation Into Ocean Common Carriers' Practices and Restrictions on Chassis Usage (Docket No. FMC-2026-0100)

Dear Chairwoman Laura DiBella,

The Consumer Technology Association (CTA) appreciates the opportunity to comment on the Federal Maritime Commission's (FMC) request for input on how ocean common carriers' chassis practices and restrictions affect the ocean supply chain.

As North America's largest technology trade association, CTA is the tech sector. Our members are the world's leading innovators – from startups to global brands – helping support more than 17 million American jobs. CTA owns and produces CES – the most powerful tech event in the world and a global platform that convenes industry leaders and policymakers to address technology, trade, investment, and innovation.

Hundreds of our members depend on efficient, predictable and competitively priced ocean transportation to import components and products into the United States. They regularly work with vessel-operating common carriers (VOCCs), non-vessel operating-common carriers (NVOCCs) and marine terminal operators (MTOs). Reliable and fair access to chassis and chassis providers is critical to keeping the supply chain moving, controlling costs, and ensuring technology products reach U.S. businesses and consumers without disruption.

Our members report that certain ocean common carriers use service contract terms and other commercial practices to require shippers and their motor carriers to use designated chassis providers. These requirements limit drayage providers' ability to choose among competing chassis providers in key markets of interest to the Commission, including Los Angeles/Long Beach, Savannah, Memphis, and Chicago. Similar restrictions occur in other major gateways, including the Port of New York and New Jersey.

These issues arise because certain VOCCs designate specific chassis providers as exclusive in their service contracts, which limits shippers' and motor carriers' ability to choose among competing options. In other cases, MTOs impose additional restrictions through their own contracts with chassis providers, even when pooled chassis access is allowed. In some locations, MTO-controlled chassis pools offer only limited free time, which further reduces flexibility. Together, these practices restrict chassis supply and drive up costs for U.S. importers.

Chassis pool restrictions and resulting shortages create a recurring and unavoidable cost burden for beneficial cargo owners ("BCOs"). Although BCOs and their motor carriers try to verify chassis availability in advance, online systems often do not reflect real-time conditions. As a result, truckers may arrive at the port only to find that no roadworthy chassis are available, which prevents them from competing pickups. These failed pickup attempts typically cost BCOs between \$400 and \$500 per trip, creating significant and avoidable expenses.

When BCOs cannot access port- or carrier-designated chassis, they rely on chassis from their logistics service providers, which are also in limited supply. Even when service contracts include chassis free time, BCOs still pay their providers to use privately supplied chassis. CTA members report that these charges average about \$90 per trip, and some companies incur millions of dollars each year in chassis-related expenses.

Alternatively, BCOs may delay pickup until chassis become available, which exposes them to even higher demurrage charges. In each scenario, restricted access to chassis increases transportation costs that BCOs ultimately pass through the supply chain to American consumers.

BCOs also generally cannot negotiate directly with chassis pool providers. As a result, shippers face effectively non-negotiable terms and conditions with few meaningful alternatives.

Ocean common carriers generally do not reimburse shippers for costs related to chassis splits. CTA members report paying an additional \$125 to \$150 per trip when splits occur, which further increases overall drayage and transportation costs.

In sum, CTA members face persistent chassis shortages at major port gateways, substandard or poorly maintained chassis that prevent successful pickups, rising costs including chassis-related charges and reduced cargo flow across the supply chain. CTA recommends that the Commission eliminate unjust and unreasonable chassis pool restrictions to restore commercial flexibility, improve equipment availability and quality and support the efficient movement of freight into and out of U.S. ports.

CTA appreciates the Commission's leadership in addressing these issues and stands ready to provide additional information or member perspectives as the investigation moves forward.

Sincerely,

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Michael Petricone
Senior Vice President of Government Affairs
Consumer Technology Association

A handwritten signature in black ink, appearing to read "Edward J. Brzytwa II". The signature is cursive and somewhat stylized, with the last name being the most legible part.

Ed Brzytwa
Vice President of International Trade
Consumer Technology Association