

THOUGHT LEADERSHIP

LEGAL UPDATES

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Ocean Carriers' Chassis Mandates Face FMC Scrutiny

On January 26, 2025, the Federal Maritime Commission (FMC) launched an investigation into reports that ocean common carriers are improperly restricting truckers and shippers from obtaining chassis. The Shipping Act requires all ocean common carriers to create and follow just and reasonable regulations and practices for handling and transporting cargo (46 U.S.C. § 41102(c)). The FMC previously determined that it is unreasonable under section 41102(c) of the Shipping Act for regulations and practices to require motor carriers and shippers to use only the chassis provider designated by ocean common carriers (*Intermodal Motor Carriers Conference v. OCEMA*, FMC Docket No. 20-14, 2024 WL 641501 (FMC Feb. 13, 2024)).

The FMC emphasized that carriers cannot rely on contract language to evade Shipping Act obligations or justify conduct that interferes with chassis choice, even when cargo moves under a service contract. As an initial step in this investigation, the FMC invites shippers, transportation service providers, chassis equipment providers, other interested stakeholders, and the public to comment on:

Whether these practices and restrictions currently occur.

How parties implement or impose them.

And how they affect or restrict truckers' or shippers' ability to independently select, negotiate, and engage with chassis providers.

What this means to you

This investigation serves as a reminder that ocean carriers cannot dictate chassis providers for merchant haulage shipments, and that such restrictions may violate the Shipping Act. To inform their investigation, the Commission asks the public to share information on any restrictions ocean carriers place on

shippers or truckers when choosing or negotiating with chassis providers. If you would like to submit comments, they must be submitted by **March 27, 2026**.

Contact us

If you have questions regarding chassis selection laws and practices or would like assistance submitting comments to the Commission please contact Julie Maurer, Benjamin Nashed, Serena Tang, or your Husch Blackwell attorney.