

January 22, 2014

William J. Baer, Esq.  
Office of the Assistant Attorney General  
Antitrust Division  
Department of Justice  
Main Justice Building  
Room 3109  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

Via courier

### **Request for Business Review Letter**

Dear Assistant Attorney General Baer,

Flexi-Van Leasing Inc. ("FVLI") and Direct ChassisLink, Inc. ("DCLI") are writing to request a business review letter under 28 C.F.R. § 50.6 concerning their plan to enter into a chassis use agreement at the ports of Los Angeles and Long Beach.

FVLI and DCLI are chassis leasing companies that also manage chassis pools in the Los Angeles and Long Beach area. FVLI manages the Los Angeles/Long Beach Basin Chassis Pool ("LABP"). DCLI manages the Grand Alliance Chassis Pool ("GACP"), as well as chassis in other pools in the area. Through these pools, the companies lease chassis to motor carriers and other users for the transport of intermodal freight containers. The pools include chassis owned by the parties, as well as chassis owned by third parties. Chassis pools provide efficiency benefits, such as improved utilization, and are prevalent throughout the industry.

The proposed agreement would allow users of one pool to interchange chassis managed by the other pool. For example, pursuant to this arrangement, a chassis user could pick up a chassis from one of the DCLI start/stop pool locations and eventually return it to one of the FVLI-managed LABP start/stop locations. The parties would continue to operate each pool independently, including decisions by individual chassis owners on the rates to charge chassis users, but the agreement would facilitate interchangeability among a larger group of chassis in a materially-expanded geographic scope.

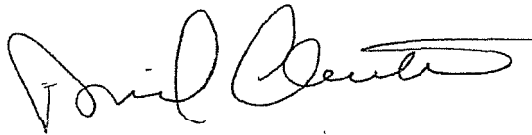
This agreement enhances utilization and responds to the desires expressed by the governing bodies of the Ports of Los Angeles and Long Beach regarding more widely available interchange and enhanced efficiency of chassis operations throughout the greater port area.

In addition to this letter request, the parties are submitting a memorandum and accompanying exhibits in support of their joint request, for which confidential treatment is requested under 28 C.F.R. § 50.6(10)(c).

These materials contain commercially sensitive operational details and strategy the disclosure of which would have a detrimental effect on the parties. The parties will be prepared to supplement this showing, as necessary, in accordance with the provisions of 28 C.F.R. § 50.6(10)(c).

Thank you for your consideration. We would be pleased to respond to any questions.

Sincerely,



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