CALL Lesson of the Day

Subject: Container Management Lessons Learned

Date: 13 MAR 2012

Theater: Spartan Shield/OND/OEF

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Background: The Army is experiencing difficulty in establishing 100 percent accountability of all containers and container content in both theaters of operation. ARCENT is the designated container manager for theater.

The Country Container Authority (CCA) is the container management representative for their respective country. The seven CCAs in Southwest Asia are located in Afghanistan, Egypt, Iraq, Jordan, Kuwait, United States Central Command (USCENTCOM), US Air Forces Central (USAFCENT), and Naval Forces Central Command (NAVCENT). Each CCA is responsible for between 14–422 Container Control Officers (CCOs) respectively; the number of CCOs depends upon the size of the CCA area of responsibility (AOR). In large areas, such as Afghanistan, the CCA has approximately 422 CCOs to manage 640 geographical locations (GEO LOCs). GEO LOCs are areas specifically designated to store containers and are assigned a four digit code in Integrated Booking System-Container Management Module (IBS-CMM) to assist in the inventory process. The CCOs supervise container yard managers within their AOR. Both CCOs and yard managers manage GEO LOCs.

The U.S. Army uses Radio-Frequency Identification (RFID) tags to help track and identify containers and their contents. The Army developed IBS-CMM to track carrier-owned containers and to assist the US Government with reducing detention, port storage, and driver wait time costs. IBS-CMM has evolved to become the US Army's primary database of record for maintaining physical accountability of containers throughout the CENTCOM AOR. IBS-CMM can provide near real-time tracking of each container's location and its dwell time at each location.

Common container metrics reported at strategic level/CCA include:

- Number of empty containers
- Total number of containers in country
- Total number of containers inventoried per month
- Total carrier containers per GEOLOC
- Total carrier containers incurring detention per GEOLOC

Common metrics reported at operational level/CCO include:

- Current detention costs
- Monthly inventory percentage
- Container aging report

ARCENT in Kuwait is considering tracking "percentage of container and contents inventory accuracy" starting in April 2012.

Container metrics provide container managers at various levels with the information necessary to make strategic decisions regarding containers on their forward operating bases (FOBs).

Empty Container Collection Point (ECCP) receives empty containers for reissue. Often these sites determine container serviceability.

Central Receiving Shipping Point (CRSP) facilitates the rapid onward movement of equipment and containers deploying and redeploying out of theater. The CRSP helps control the flow of deploying and redeploying equipment by maintaining accountability and in-transit visibility.

CENTCOM Container Management community has developed a standard container report format produced through IBS-CMM to aid in GEO LOC audits. The Container Management Letter of Instruction (LOI), 28 September 2011, requires MCATs and DDSTs to use the standardized format.

Containers within the USCENTCOM AOR have several categories of ownership: 1) Government-owned (includes unit and theater-provided equipment (TPE)); 2) Government-leased (commercial containers under lease); 3) commercial-owned, Contractor-Managed Government-Owned (CMGO); or 4) coalition/non-military.

Government-owned containers are purchased by the U.S. Government. They do not incur detention charges but can incur port storage fees. Government-leased containers are commercial containers that the U.S. Government leases on a long-term basis. Carrier-owned containers are owned by international commercial shipping companies. Carrier-owned containers can incur detention charges based on the detention criteria outlined in the Universal Services Contract 06 (USC). Per USC-06, carrier-owned containers start incurring detention when the US Government exceeds the 15 calendar days of "free time" allotted to return the carrier container back to the carrier.

Detention fees are calculated as follows:

Container Type	1-90 Days
20 ft dry	$ 22.00
20 ft flat	$ 22.00
20 ft reefer	$ 70.00
40 ft dry	$ 35.00
40 ft flat	$ 35.00
40 ft open top	$ 35.00
40 ft reefer	$ 92.00
20 ft chassis	$ 9.00
40 ft chassis	$ 16.00

- Container lease days 91–358: the carrier charges $ daily but a portion of the lease fee counts toward credit against potential purchase price of container.

- On day 358, the detention fee stops accruing and ownership transfers to the US Government upon request and acceptance.

In-gating: When containers enter a FOB, two types of in-gating: "truck in-gating" and "data in-gating" are conducted. Truck in-gating is the physical reception of the truck

carrying container into the base. Data in-gating requires the CCO to process the container data into the IBS-CMM system. In Afghanistan, but not Kuwait, when a container departs a FOB there is also a physical truck out-gate and a data out-gate.

If the US Government directs the commercial carrier to transport the container to a carrier holding yard (CHY) (an area managed and owned by the commercial carrier). a daily fee is assessed on the containers; this fee applies to both Government and commercially owned containers. CHY fees stop within three business days upon receipt of a movement request issued by the Contract Officer Representative (COR) or Surface Deployment and Distribution Command (SDDC) battalion. Free-time runs while containers are staged in the CHY until Required Delivery Date (RDD). 15 days after the RDD, detention costs begin to accrue whether or not the cargo has been delivered.

CENTCOM LOI September 2011 required unit commanders to designate a CCO as a primary duty of assignment. Appointment letter is to be sent to Container Management Element (CME), which will subsequently update IBS-CMM with name of CCO, email contact information, and Relief-in-Place/Transfer of Authority- (RIP/TOA) date. Unfortunately, this has been difficult to enforce, as container management officials are usually from a different chain of command and consequently have no authority. Many units do not have sufficient personnel to allow the CCO assignment to be a primary duty. Mobile Container Assessment Team (MCAT) visits have been successful in identifying CCO vacancies and facilitating appointing replacement CCOs.

Convention for Safe Container (CSC) Inspections

1. **Observation:** Inspectors sometimes did not perform Convention for Safe Containers (CSC) inspections in accordance with DoD standards.

    a. **Discussion**: Because many containers have been sitting on wet ground for several years in Afghanistan and thus been exposed to elements which cause metal erosion on the underside of the container, inspecting the underside of the container is important in determining serviceability for shipping. A faulty container bottom carrying HAZMAT or sensitive items could have catastrophic results in transit.

    To perform container inspections, command initiated a theater-wide training program to obtain qualified inspectors, which required completion of the Army's Ammo 43 Intermodal Dry Cargo Container/CSC Re-inspection Course. Although properly trained, inspectors did not always empty container contents prior to inspection to allow for inspection of inside of container and flooring. In addition, unit level inspectors did not always place containers on an inspection stand to inspect underside of container as required by inspection standards outlined in DOD Mil Handbook 138b (Guide to Container Inspection for Commercial and

Military Intermodal Containers and Convention for Safe Containers Standards).

The primary cause for the non-standard inspections was unit-level inspectors lacked sufficient resources and capabilities. Unlike most empty container collection points (ECCPs) and container repair yards that had dedicated personnel and equipment to perform inspections, unit personnel performed inspections as an additional duty and had limited or no access to material handling equipment and inspections stands.

Personnel responsible for performing inspections may have not completed inspections or updated the serviceability/damage status in IBS-CMM because they were unaware of the requirement. The Container Management LOI September 2011 provides clearly defined container inspection requirements and must be disseminated to all applicable parties.

September 2011 LOI requires monthly inspections and updating the following data in IBS-CMM in the remarks field after container inspection:

- Date of last inspection
- Inspector contact information
- Results of inspection (pass/fail/level of repair needed)

b. **Recommendation**: ARCENT G4 recommends enforcing Container Management LOI September 2011, ensuring dissemination to all stakeholders and all those implementing its requirements, and sustaining the language in the September 2011 LOI in future publications.

2. **Observation**: Command did not have sufficient method to track container serviceability inspection results and level of repair needed or validate serviceability status.

a. **Discussion**: To remedy shortfall in container serviceability and inventory inspections, US Army Audit Agency's Container Management in Iraq Condition and Contents recommended USFI to issue a FRAGO requiring a quality assurance program at the CRSP yards to perform cursory inspections to ensure all containers are free from major defects and or structural damage in accordance with applicable standards and ensure serviceability status is accurate in IBS-CMM before onward movement.

USF-I issued FRAGO 1277 Trans 0111-4 USF-I Container Management for Iraqi Joint Operating Area to USF-I (Operations Order (OPORD)) 10-01. The FRAGO required commanders at all levels to be accountable and/or responsible for maintaining accurate inventory records of all containers under their control or in their geographical location regardless of ownership. Specifically, the FRAGO requires units to conduct monthly

100 percent inventories and serviceability inspections of all containers in their possession using the IBS-CMM.

Per regulation (Code of Federal Regulations (CFR) 49 and International Maritime Dangerous Goods Code (IMDG)), containers must be inspected for serviceability. Per CFR 49 and IMDG code, every container must have a valid Convention of Safe Containers (CSC) inspection. Every new container is valid for five years; a CSC inspection is required every 30 months thereafter. The Army has a Defense Transportation Regulation (DTR) specifying inspection requirements which requires a unit member to conduct the CSC inspection and apply the CSC validation sticker.

This process is not sufficient in theater because of a shortage of qualified personnel to conduct a proper inspection. In Afghanistan, the problem is magnified because of command fragmentation, communication, and travel difficulties. In addition, the commanders often do not ensure that their units designate and train their Soldiers to be qualified inspectors. The process is not problematic in CONUS because contracted or civil servant civilians help manage the program and provide qualified inspectors.

b. **Recommendation**: US Coast Guard Redeployment Assistance Inspection Detachment (RAID) recommends:

- Unit Mobilization Officer (UMO) attend the redeployment brief in theater 120 days prior to redeployment to obtain container inspection requirements

- UMO complete the online container management course "Ammo 43" at http://ammo.ok.state.edu

- Ensure units receive and comply with container management and CSC inspection guidance from the Container Management LOI September 2011

- Establishing a quality assurance program at the Central Receiving and Shipping Point (CRSP) to perform cursory inspections to ensure containers are free from major defects or structural damage and ensure the serviceability status is accurate in IBS-CMM before onward movement

- Enforcing existing policy which requires inspections of all containers and updating the serviceability status in IBS-CMM. In addition, annotate the completed inspection information in "remarks" field

Online training is only part of the inspection qualification requirement. A commander certification letter is also required to authorize Soldiers to inspect containers. The Army Intermodal and Distribution Platform

Management Office (AIDPMO), Tobyhanna, PA, also assists with container inspection training for Soldiers prior to deployment. AIDPMO provides job aids to assist Soldiers in conducting container serviceability inspections.

Surface Deployment and Distribution Command (SDDC) provides Coast Guard RAID teams to help conduct container serviceability inspections in theater and assist UMOs obtain CSC stickers.

Container Detention

The following are the reasons why units do not immediately empty and return the containers to the commercial carrier within the free time, along with corresponding recommendations to resolve the issues:

3. **Observation**: Army units in Afghanistan use containers for many unauthorized purposes.

    a. **Discussion**: Some units do not have a warehouse for container contents and, consequently, use containers as storage facilities. For example, Army and Air Force Exchange Service (AAFES) uses carrier refrigerated containers because they do not have refrigerated storage at most bases in Afghanistan. Some units use containers for command posts, housing units, bunkers, force protection walls, and post exchanges.

    b. **Recommendations**: The 595th Trans BDE recommends:

    - purchasing commercial containers used for housing units or bunkers and allowing continued use of containers for these purposes until replaced with superior substitutes, such as HESCO bastions

    - using Government owned containers, categorized as unserviceable (deemed un-repairable or Beyond Economic Repair (BER)) in IBS-CMM for temporary storage, quarters, offices, force protection walls, or other uses

    - procuring additional Government owned containers to enable units to transfer contents from commercial containers into Government owned containers

    - providing the commander with a cost matrix to evaluate different courses of actions (COAs) for each container, such as using Government owned containers for housing, offices, or force protection walls. If the present use is justified, permit container to continue to be used for current purpose, remove it from the transportation container pool, and properly identify container's status in IBS-CMM

4. **Observation**: Contractors avoid the cost of building warehouse space by using containers for storage space.

a. **Discussion**: None

b. **Recommendation**: 595th Trans BDE recommends prohibiting using containers as a storage facility in contracts' scope-of-work.

5. **Observation**: Host nation governments restrict either a camp's building footprint or construction of permanent warehouses to prevent the U.S. military from establishing a permanent presence.

   a. **Discussion**: None

   b. **Recommendation**: Obtain mobile (temporary) warehouses, such as air supported structures or inflatable buildings to provide storage space for supplies and comply with host nation building restrictions. Modify the CENTCOM LOI to include a recommendation to purchase storage facilities.

6. **Observation**: A proposed new contract for shippers will extend the grace period for returning containers to 20 days from 15.

   a. **Discussion**: Under USC 6 Contract, if the military fails to return a container within the free-time, a detention fees accrue each day. After 91 days of accumulating detention fees, a portion of the detention paid will be considered credit against container purchase price (CAP). At day 91 detention will continue to accrue until the container is returned to the carrier, notified for carrier pick-up, or the Government notifies the carrier that it will purchase the container. If the Government returns or requests pick-up of the container after day 90, it shall not be entitled to a refund of any accumulated detention after day 91 including the CAP. Detention will cease to accrue when either the Government notifies the carrier of intent to purchase or when the accumulated credit against detention for the container equals the container purchase price. See below CAP rates and container purchase prices per USC-06:

Container Type	Daily Detention Fee	CAP	Purchase Price
20 ft dry	$22	$13	$3,200
20 ft flat	$22	$13	$5,000
20 ft reefer	$70	$26	$31,500
40 ft dry	$35	$19	$5,100
40 ft flat	$35	$19	$7,000
40 ft open top	$35	$19	$6,500
40 ft reefer	$92	$35	

b. **Recommendation**: All future contracts should provide a 20 day grace period to return container to shipper.

Causes of Poor Container Accountability

The following are the issues that contribute to poor container accountability, along with corresponding recommendations to resolve the issues.

7. **Observation**: Due to the lower cost of shipping 40-ft containers, the Northern Distribution Network (NDN) primarily uses 40-ft containers to transport cargo to Afghanistan. Several remote camps, such as combat outposts (COP), lacked the material handling equipment (MHE), such as forklifts and container handlers, to perform container lifting and stuffing/un-stuffing operations for 40-ft containers. Due to the lack of MHE to support 40-ft containers, many units did not return containers to the commercial carriers.

    a. **Discussion**: In the past few years, the Army has supplied more bases in Afghanistan with MHE capability to process 40-ft containers; however, several camps still do not have adequate MHE.

    b. **Recommendation**: ARCENT G4 recommends:

    - identifying MHE requirements for all nodes along the transportation network prior to execution of all future sustainment missions, as this has been a recurring issue.

    - SDDC use the list of FOB MHE capability and only ship 40-ft containers to those FOBs capable of servicing 40-ft containers.

8. **Observation**: Commercial carriers transport containers to bases which do not have internet connectivity to support IBS-CMM. Without IBS-CMM, containers can arrive and depart the FOB without visibility within the Army's tracking system.

    a. **Discussion**: None

    b. **Recommendation**: Track Government- and carrier-owned containers via satellite. Satellite tracking does not require containers to cross specific points as does the interrogator radio-frequency tracking system.

9. **Observation**: The CENTCOM Container Management LOI (28 September 2011) does not provide adequate guidance to commanders to ensure they assign their CCOs a reasonable number of containers to manage.

    a. **Discussion**: In Afghanistan, one CCO can be responsible for up to 9,000 containers and four GEOLOCs and is expected to perform monthly inventories as well as continuously update IBS-CMM. This CCO could become overwhelmed due to the quantity of containers and consequently unable to fulfill his/her duties effectively.

b. **Recommendation**: Modify the CENTCOM Container Management LOI (28 September 2011) to read, "Assign CCOs an appropriate level of work within their capacity to manage."

10. **Observation**: Several CCOs in Afghanistan did not conduct accountability of all containers in their AOR and consequently were not aware of the existence of the containers or their contents.

   a. **Discussion:** In Afghanistan, the CCO task is an additional assigned duty which often receives a lower priority with respect to many other assigned duties. The low priority CCO duties receive is due to a lack of command emphasis on container management.

   b. **Recommendations**: ARCENT G4 recommends the following:

   - Improve enforcement on CCOs requirement to conduct inventories each month and update IBS-CMM and container / cargo disposition reports

   - Improve Army command emphasis on container management through:

     o assigning accountability and responsibility to container users. Accountability assignment would require that all Government-owned or leased containers be added to a unit's property book or hand receipted to a designated user.

     o assessing penalties for non-compliance of Container Management LOI.

11. **Observation**: Many military organizations are not aware of the requirement to return the commercial containers to the carriers. Nor are they aware that the unauthorized use of commercial containers (containers converted into bunkers, offices, or other uses) causes the containers to accumulate detention fees.

   a. **Discussion**: None

   b. **Recommendation**: Provide training and distribute CENTCOM Container Management LOI (28 September 2011). Discuss container management requirements at unit Pre-deployment Site Survey (PDSS).

12. **Observation:** Many IBS-CMM inputs are inaccurate, incomplete, or out of date.

   a. **Discussion:** Invalid or outdated information in IBS-CMM adversely impacts the Army's ability to forecast accurate detention costs. Information in IBS-CMM is not kept current or accurate for the following reasons:

   - Personnel are not properly trained. Although MCATs and DDSTs provide effective training, personnel scheduled to attend training are often unable to attend due to force protection issues preventing travel and the lack of freedom of movement in a combat zone.

- Containers that are inbound to the ARCENT area of operation for the first time are not submitted into IBS-CMM. The CCO at the first GEOLOC is expected to create the container in IBS-CMM and subsequently in-gate the container. This requires expertise and time that the CCO rarely possesses and often results in non-ingated containers.

- Lack of awareness of in-gate/out-gate procedures, often a result of a lack of training.

- Contractors are not aware of in-gate/out-gate procedures or requirements due to a lack of training and the procedures are not identified in the contract scope-of-work/

Additionally, IBS-CMM does not contain specific data fields to record completed inspection data, such as date of last inspection, name of the inspector, contact information, results of inspection, level of repair needed, and disposition instructions.

Inspectors can upload completed equipment inspection and maintenance worksheets (DD Form 2404) into IBS-CMM and/or record inspection information in the remarks field. However, because IBS-CMM does not have an inventory search capability, each user must review individual container records for information.

Without updated container inspection information, the 595th Transportation BDE is unable to determine the number of available serviceable containers for shipping or how many containers need inspection or repair.

b. **Recommendation**: ARCENT G4 recommends the following:

- CCOs complete IBS-CMM training prior to deployment

- Contracted employees complete container management training in CONUS prior to arrival in theater

- SDDC provide training on compact disks (CDs)

- provide training via computer and video conference

- ensure contractors' scope-of-work addresses financial penalties for failure to comply with container management policies and procedures

- release excess cargo to the Supply Support Activity (SSA) to be stored and re-issued to other units

- CCOs need to identify the number of containers needing repair to determine repair facility requirements

13. **Observation**: The Army is experiencing several challenges in properly in-gating and out-gating containers into IBS-CMM.

    a. **Discussion**: When containers enter a FOB, base personnel must conduct two types of in-gating: "truck in-gating" and "data in-gating." Truck in-gating is the physical reception of the trucks carrying containers into the base, whereas data in-gating requires the CCO to process the container data into the IBIS-CMM system.

    Data in-gating and out-gating enables IBS-CMM to track the container locations. Poor enforcement of established in-gate/out-gate procedures results in loss of visibility of the container and its contents.

    In addition, RFID tags, which provide satellite feeds of a container's location are often installed with expired batteries rendering them inoperative. Furthermore, the RFID tags are not loaded with the container content data as required.

    b. **Recommendation**: Distribute in-gate/out-gate procedures and container-use policies throughout theater.

Container Management at FOBs

High Level
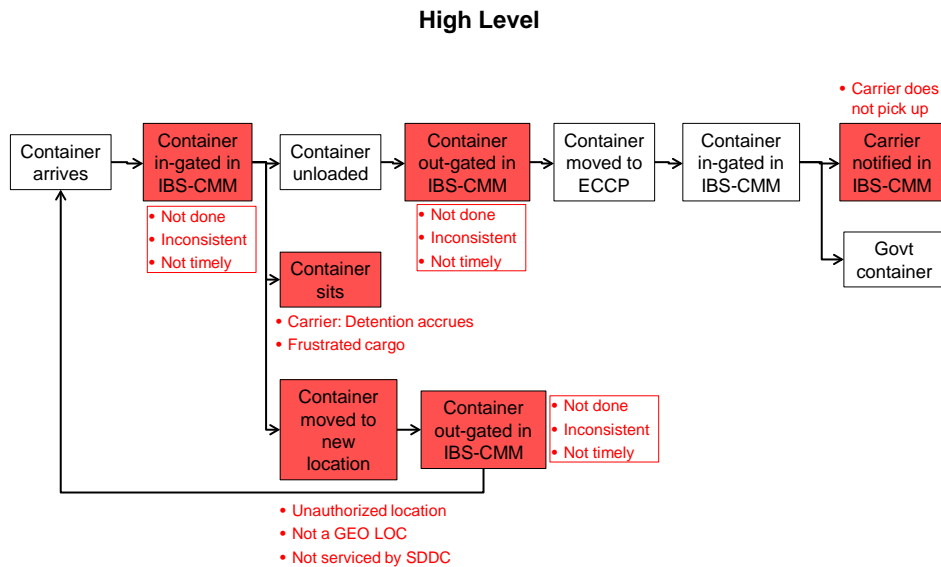
ARCENT G4 recommends the Army:

- consider placing the container and container's contents on unit property books to be accounted for and be visible for future use.

- enforce compliance with the Defense Transportation Regulation which requires units' assigned CCO to manage and maintain accountability of containers.

- UMO, TCAIMS NCO, or Mobility Warrant ensure proper input of level 6 data (containers' contents)

- maintain data integrity in the IBS-CMM system; hold CCOs and yard managers responsible for updating the status of the containers within their AOR. Container managers at all levels must be able to reconcile discrepancies and missing data in IBS-CMM. They must also be able to determine actions necessary to resolve containers not visible in IBS-CMM.

- improve enforcement of in-gate/out-gate procedures

- assess a penalty on units for non-compliance of in-gate/ out-gate procedures

14. **Observation:** Containers are not in-gated into IBS-CMM upon arrival at the FOB, which results in unaccounted-for containers.

   a. **Discussion**: The Movement Control Teams (MCTs) in Afghanistan do not in-gate containers into IBS-CMM because their job is to manage the flow of trucks to their destination within the FOB.

   Due to force protection procedures in Afghanistan, some FOB commanders do not allow non-security personnel near the entry control points to in-gate containers into IBS-CMM, but must in-gate containers at locations inside the camp. Because of the inability to in-gate containers at a common point of entry, carriers deliver containers to the end users inside the FOB, who frequently neglect to in-gate containers and update IBS-CMM.

   To remedy the problem, the Logistics Director of USCENTCOM issued Container Management Policy Letter of Instruction (LOI) which requires Movement Control Teams (MCTs), Sustainment Brigades (SBs), and CCOs to in-gate and out-gate containers at life support areas (LSA), forward operating bases (FOB), combat outpost (COP), base entry control points (ECPs), Empty Container Collection Points (ECCPs), Central Receiving Points (CRPs), Central Receiving and Shipping Points (CRSPs). These organizations are also responsible for maintaining all shipping documentation that was provided to the carriers' representative or drivers.

   b. **Recommendation**: ARCENT G-4 recommends sustaining the requirement for CCOs to in-gate containers.

15. **Observation**: Bases in Afghanistan have multiple GEO LOCs which require in-gating and out-gating from one GEO LOC to another within the base. Many of these camps lack sufficient staff to in-gate and out-gate containers, often resulting in unaccounted-for containers in IBS-CMM.

    a. **Discussion**: Creating a primary and secondary GEO LOC at each FOB for in-gating and out-gating will improve accountability in situations where camps do not have sufficient staff to in-gate and or out-gate containers within the FOB.

    (Note: US Army camps in Kuwait currently use a primary and secondary in-gate/out-gate process in IBS-CMM to track the arrivals and departures of containers.)

    b. **Recommendation**: ARCENT G4 recommends:

- developing a primary in-gate/out-gate or a weigh point in IBS-CMM to track container arrivals and departures at each camp in Afghanistan, with a secondary in-gating/out-gating for each GEO LOC within the camp in IBS-CMM to improve accountability of containers.

- carriers and MCTs must coordinate with SDDC to develop an agreed upon location/process to in-gate and update way point field in IBS-CMM upon arrival of containers at FOBs.

- continue to use MCATs to help clean up locate unaccounted-for containers on FOBs, improve container inventory accuracy, and decrease detention.

- email container consignee notifying destination that container is in transit to their location.

    (Note: currently, CCO training emphasizes the importance of monitoring the out-gate report and requires out-gating CCO to maintain visibility of container until it is in-gated at destination.)

16. **Observation:** The IBS-CMM is subject to operator error during data input.

    a. **Discussion:** In addition to the CCOs, the MCAT enters and updates container data into the IBS-CMM system. MCATs also provide training to CCOs at the Geo LOCs. Lack of adequate staffing and training to update data in the IBS-CMM system however, adversely impacted the Army's ability to account for its containers.

    SDDC improved in theater IBS-CMM training, which significantly reduced operator errors during IBS-CMM updating. Providing training prior to deployment may also aids to improve skill level. The CENTCOM Container LOI requires CCOs to be appointed during the relief-in-place (RIP) / transfer of authority (TOA) after arriving in theater. If units identified

their CCOs prior to deployment, these Soldiers would have an opportunity to schedule and complete CCO and IBS-CMM training prior to deployment.

The CENTCOM Container LOI (page 9) identifies the CCO appointment as a primary duty. If CCOs could be primary duties, container management would receive a higher priority and could achieve the staffing requirements necessary to fulfill container management mission requirements.

b. **Recommendation:** ARCENT G4 recommends:

- CCOs complete IBS-CMM training prior to deployment

- Increasing training for container managers and designating more container management positions as full time jobs

- Country Container Authority (CCA) ensures all IBS-CMM users are trained to accurately input data and conduct quality control checks to verify data accuracy periodically

17. **Observation:** A major cause of poor container accountability is due to CCOs not maintaining visibility on their out-gated containers while in transit to their destination Geographical Location (GEO LOC).

a. **Discussion**: Although a unit out-gates a container, it remains on their unit inventory until the receiving unit in-gates the container. CCOs of out-gated containers, however, do not maintain visibility of containers in-transit, leaving the responsibility for container tracking solely to the containers' destination CCO. Requiring the container's destination and origin CCOs to track in-transit containers until they are in-gated at the destination GEO LOC will improve accountability.

b. **Recommendation**: ARCENT G4 should require origin and destination CCOs to track out-gated (in-transit) containers using the out-gated report and email notification of in-transit containers until in-gated at destination.

18. **Observation**: The scope-of-work for contracts which provided sustainment of classes of supply did not specify container management requirements.

a. **Discussion**: The 1st TSC's sustainment brigade modified sustainment contracts' scope-of-work, to include container management responsibilities for the contractor. The CJOA-A LOGCAP contract promulgates FOB mayors to authorize container management functions which prevents outside influence, such as CCAs.

b. **Recommendation**: ARCENT G-4 recommends including contractor's container management responsibilities in sustainment contract scopes-of-work.

19. **Observation**: Soldiers arrive in theater needing IBS-CMM training and access to IBS-CMM.

    a. **Discussion**: Obtaining IBS-CMM access often requires one week (one day application process and one week to obtain password) which delays units' ability to execute their mission.

    b. **Recommendation**: The 364th ESC SPO Mobility Section recommends Soldiers obtain primary IBS-CMM access and training at mobilization station.

20. **Observation**: Although CENTCOM Letter of Instruction (LOI) and a USF-A FRAGO (USFOR-A 11-038) outline procedures for accounting for and returning commercial containers, CCOs returned only a small fraction.

    a. **Discussion**: Units do not comply with LOI and FRAGO directives for the following reasons:

- The limited transportation resources available in Afghanistan to move containers

- The time required to transport containers in Afghanistan due to terrain, distance, Third Party Logistics (3PL) employee strikes, and religious holidays.

- The expense of moving containers in Afghanistan (the cost of returning an empty container often exceeds the cost of the container). For example, to transport a container from Camp Leatherneck, Afghanistan, to CONUS costs up to three times the cost of a container

- Although all GEO LOCs in Afghanistan have yard managers, approximately 200 GEO-LOCs do not have an assigned CCOs to conduct monthly inventories and other container accounting functions

    b. **Recommendation**: To improve compliance with the container LOI and FRAGO, the ARCENT G4 Mobility's Surface Branch, recommends the following:

- Require Afghanistan Regional Commanders (RC) to issue FRAGOs in support of the CENTCOM LOI, such as 1st TSC's "Clean Sweep" FRAGO 1423 to 1st TSC OPORD 08-001.

- Modifying FRAGO USFOR-A 11-038 with the following:

        o All COP and FOB S-4 representatives and camp mayors will include the requirement to comply with the commercial container retrograde requirement as an objective in their evaluation report support forms

- Brief the commercial container retrograde requirement at the redeployment site surveys (RDSS)
- Modifying CENTCOM LOI with the following:
    - Refine duties and responsibilities
    - Wire diagram for step by step inventory and reconciliation process
- Establish a CME/Lean Six Sigma initiative directing CCAs to identify container requirements throughout respective AOs

21. **Observation**: Mobile Container Assessment Teams (MCAT) conduct periodic site visits of CCOs to validate container management processes and procedures. The MCATs have developed into the CCA's enforcement arm in the Combined Joint Operations Area-Afghanistan (CJOA-A). Each MCAT is assigned a set of GEOLOCs that they visit every 60 days. They update the GEOLOC data within IBS-CMM and perform all non-routine IBS-CMM functions. Deployment Distribution Support Teams (DDSTs) work with Movement Control Assessment Teams (MCATs) to resolve container accountability issues, such as locating containers.

    a. **Discussion**: MCAT teams do not have a standardized inventory process which impedes their ability to account for containers on a monthly basis. For example, some teams do not or are unable to conduct inspections of some sites in Afghanistan due to transportation limitations.

    b. **Recommendation**: The 364th ESC SPO Mobility Section recommends:
    - standardizing the MCAT inventory process: inventory frequency and method of accounting (i.e., inspecting 5% versus 10% of container inventory in each yard)
    - increasing transportation assets to enable MCAT teams to inspect all bases on a monthly basis

22. **Observation**: Army Container Asset Management System (ACAMS) does not provide tactical commanders container visibility in CENTCOM Theater as the system was designed for use in CONUS.

    a. **Discussion:** If a container is located in CONUS, logisticians in CENTCOM must query contractors with access to ACAMS.

    b. **Recommendation:** The 364th ESC SPO Mobility Section recommends Electronic Transportation Administration (ETA) provide ACAMS read only access to the CCAs.

Container Contents Issues

23. **Observation:** Military personnel are not inventorying containers' contents

    a. **Discussion:** Units reorder supplies unnecessarily as a result of not inventorying their containers.

    b. **Recommendation:** ARCENT recommends improving FOB discipline in inventorying container contents.

24. **Observation**: Although redeploying units used proper blocking and bracing procedure to pack containers with their organizational and personal property, many contracted personnel did not comply with container packing standards (Field Manual 55-80) when packing excess theater equipment.

    a. **Discussion**: Several containers shipped to retrograde sort yards and redistribution facilities with excess theater equipment arrived improperly packed, blocked, or braced. Moreover HAZMAT was segregated improperly and missing shipping documents. When containers do not have sufficient blocking and bracing, the contents and the container are often damaged in transit.

    b. **Recommendation**: ARCENT G4 recommends

    - Personnel who pack containers must complete online Army Training Requirements System (ATRRS) course, "Defense Basic Preservation and Packing" (PACK-1A-DL)

    - requiring contractors to complete DD Form 2781 (Container Packing Certificate or Vehicle Packing Certificate) for all containers shipped from Afghanistan as a means to hold responsible vendors accountable for the proper packing, blocking, and bracing of deficiencies. The form contains the contact information such as name, organization, location of the person responsible for packing the container. This information is important as it provides accountability of the packing, blocking, and bracing process

    - add "Defense Basic Preservation and Packing" course to contract scope-of-work as a requirement for contracted personnel to complete prior to packing containers

    - requiring a placard to be completed and affixed to the inside of the container which includes the unit or contractor, and individual responsible for packing the container verifying that the container was properly packed, blocked, and braced per AR ?? and AR and the International Maritime Dangerous Goods Code (IMDGC)

25. **Observation**: Per CENTCOM regulation, only authorized personnel are permitted to open (break seals) containers. Consequently, containers often wait several months for authorized personnel to open them and determine contents.

    a. **Discussion**: Often containers sit outside the camps full of cargo because the unit is not aware of its location and consequently reorder the same cargo.

    b. **Recommendation**: ARCENT G4 should identify a standard for when a frustrated/abandoned container is opened and a standard for how soon the contents should be inventoried and brought to record.

26. **Observation:** The failure to identify and return excess material to Supply Support Activity (SSA) causes units to use carrier containers as storage.

    a. **Discussion:** Units fail to identify current inventory of equipment available on the FOB, and consequently, order more equipment from supply channels. The equipment the unit ordered is often inside of a container but the unit is unaware of its location or existence due to the previous unit's failure to communicate the container's location and or existence. The failure to inventory and or communicate to replacement units results in exacerbating the poor container accountability problems and base storage space limitations and increasing costs from ordering unnecessary supplies.

    b. **Recommendations**: ARCENT G-4 Mobility Section recommends:

- enforce requirement to update IBS-CMM which includes entering class type of container contents will significantly reduce the occurrence of lost supplies

- improve unit S4's communication to replacing unit

Containers converted into multi-storied office building in Afghanistan.

Related CALL publications: None

References: "The Container Management Quandary", *Army Sustainment*, pp.10–15, March–April 2010, MAJ Darryl R. Weaver; Container Management LOI, September 2011.

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