October \_\_, 2016

Cynthia Brown

Chief, Section of Administration

Office of Proceedings

Surface Transportation Board

395 E Street, SW

Washington, DC 20423

Re: STB Ex Parte No. 711 (Sub-No. 1), *Reciprocal Switching*

Dear Ms. Brown:

My name is \_\_\_\_\_\_\_\_ [ *insert person’s name* ] \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and I am the \_\_\_\_\_\_\_\_ [ *insert title* ] \_\_\_\_\_\_\_\_\_\_\_\_\_ for \_\_\_\_\_\_\_ [ *insert company name* ] \_\_\_\_\_\_\_\_\_\_.

[ *insert company name* ] strongly supports the adoption of new reciprocal switching rules that will help facilitate greater rail competition. My company has [\_\_\_\_ or several] facilities that are served by a single class I rail carrier. These facilities are subject to substantially higher rail rates and less reliable service than our facilities that have rail competition.

We applaud the Surface Transportation Board (“STB”) for opening this rulemaking proceeding and agree that new switching rules are needed. The rail industry today is vastly different than the industry of the 1980s and no shipper has ever obtained reciprocal switching under the current rules.

We encourage the Board to adopt new switching standards that will result in streamlined proceedings before the Board. If switching cases are too complex, timely and costly then the new rules will be ineffective and will not be used. We also believe that the Board should change its proposal to address the following:

* Shortlines should be able to benefit from the rule by serving as the interchange carrier.
* Interchanges that require minimal investment to be paid by the shipper or interchange carrier should qualify as a “working interchange”.
* The Board should adopt reasonable and straightforward procedures to establish the access fee either when the railroads cannot agree on the fee or when the party seeking the switch believes the fee is not reasonable.

We appreciate the Board’s consideration of this letter and urge the agency to promptly adopt new reciprocal rules.

Respectfully submitted,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Filing Instructions: Surface Transportation Board**

**Materials must be submitted electronically by 5pm EDT on Wednesday, October 26, 2016. Follow instructions on the website below to send materials via U.S. mail.**

1. Go to <https://www.stb.gov/stb/efilings.nsf>
2. Click on the box “Request a Log-In Account”
3. Complete the information required and submit
4. You will then receive a confirmation email from the STB
5. Click on the link provided, which will complete your account registration
6. Once finalized, you may then return to the site to file your document
7. Return to this page: <https://www.stb.gov/stb/efilings.nsf>
8. Click on “Formal Filing”
9. You will be prompted to enter your user name and password. Note that your email address is your user name.
10. Complete the information requested, attach your document and submit.