

November 6, 2019

Surface Transportation Board
ATTN: Docket No. EP 757
395 E Street, SW
Washington, DC 20423-0001

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The Automobile Carriers Conference (ACC) of the American Trucking Associations (ATA) appreciates the opportunity to submit comments to the above referenced docket. The ACC represents motor carrier members of ATA that are engaged in the transportation of motor vehicles.

Our interest in the docket is relative to rail head facilities whereby rail carriers transport new motor vehicles to a large receiving areas where the rail cars are unloaded and ultimately transported to new car dealerships by automobile carriers. These rail facilities serve multiple automotive manufacturers.

What is becoming more and more prevalent in the industry today is that the railroads are unloading rail cars at these locations later in the week, unloading thousands of vehicles at a time. In many areas of the country, new car dealerships will not accept vehicle deliveries on weekends. That means that the cars are sitting on the ground waiting for dispatch on Sunday and Monday for deliveries. While this is occurring, the demurrage charge clock is ticking as these vehicles sit in the rail yard. After a preset number of hours, usually 72, the rails get to charge the auto manufacturers with demurrage charges for the automobiles cited on their property. Under contractual language with the motor carriers, some auto manufacturers pass these charges along to their motor carriers.

If the railroads scheduled the delivery of the trains at the rail head facilities in a normal and rationally spaced manner instead of bunching them all at once at the end of the week, the flow of new motor vehicles – interstate commerce – would be more efficient and the velocity of delivery would be greatly improved in addition to the fact that motor carriers would not be subject to these land based demurrage charges.

Thank you for the opportunity to provide these comments.

Sincerely,

