

June 5, 2020

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The Honorable Chairman Ann D Begeman
The Honorable Vice Chairman Marty Oberman
The Honorable Patrick Fuchs

Surface Transportation Board
395 E Street, SW
Washington, DC 20423

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Office of Proceedings
June 5, 2020
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Public Record

RE: Docket No EP 759 DEMURRAGE BILLING REQUIREMENTS
Supplemental Notice of Proposed Rulemaking

Dear Chairman Begeman, Vice Chairman Oberman, and Board Member Fuchs,

As President and CEO of Lansdale Warehouse Company and a member of the International Warehouse Logistics Association, I support the Surface Transportation Board's proposed changes to the regulations governing demurrage liability detailed in EP 759. The Oversight Hearing on Demurrage and Accessorial Charges during May of 2019 produced abundant evidence of unfair demurrage billing practices by the railroads and I believe the new rules will go a long way in creating a more fair demurrage billing process as long as the minimum information elements are included.

Keeping in mind, the overarching goal should always be an efficient rail freight network supporting national economic and commercial interests of both the railroads and its customers the shippers, and the fragile supply chain network of North America. Rail Demurrage has become a thorn in the side of the rail freight shipping process. Invoicing demurrage charges is one-sided and often times unreasonable and based on mysterious information, while hiding railroad mistakes and errors within railroad information systems and unknown and not available to the shipper especially when that shipper is a third party warehouseman acting on behalf of his customers.

For accurate demurrage invoicing, the minimum information requirements listed in the NPRM is a great starting point because there will be information shippers have never seen before and when provided in a machine-readable format, we can more easily compare and add to our spreadsheets to determine valid demurrage charges or erroneous charges.

Lansdale Warehouse fully supports and appreciates the Board's determination to bring fairness to an unreasonable and often contentious rail demurrage invoicing process.

Sincerely,



W Paul Delp
President & CEO
Lansdale Warehouse Company