

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

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DOCKET NO. EP 767

FIRST-MILE / LAST-MILE SERVICE

**REPLY OF THE AMERICAN SHORT LINE AND REGIONAL
RAILROAD ASSOCIATION TO THE MOTION TO EXTEND THE
PROCEDURAL SCHEDULE**

On September 2, 2021, the Surface Transportation Board ("Board") invited comments from stakeholders on issues regarding first-mile / last-mile ("FMLM") service. Comments are due by October 18, 2021 and reply comments by November 16, 2021. On September 7, 2021, the American Chemistry Counsel and The Fertilizer Institute ("ACC/TFI") filed a motion requesting that the Board extend those dates to December 17, 2021 and February 17, 2022, respectively. The American Short Line and Regional Railroad Association ("ASLRRA") supports the ACC/TFI motion.

ASLRRA is a non-profit trade association representing the interests of approximately 600 short line and regional railroad members and railroad supply company members in legislative and regulatory matters. Short lines operate 50,000 miles of track in 49 states, or approximately 30% of the national freight network, connecting manufacturers, businesses and farmers in communities and small towns to larger markets, urban centers, and ports. Our railroad members operate in 49 states and in some cases account for the state's entire rail network. Class II and III railroads play a vital role in maintaining rail service over hundreds of miles of light density lines throughout the country that in many cases were candidates for abandonment by their former Class I owners. These small railroads have short lengths of haul, high fixed costs, and large capital needs for infrastructure investment, including the task of upgrading bridges and track to handle heavier freight cars. They also face pervasive competition from trucks, barges, and transloading operations for freight traffic.

The Decision seeks detailed information from stakeholders in three broad areas. First, the Board has asked for concrete examples of FMLM issues and has posed eight detailed questions. Second, the Board has posed over six questions about useful FMLM metrics and how they would be used. Third, the Board has asked over a half dozen questions about the data carriers maintain on FMLM and various trade-offs associated with varying degrees and scope of data reporting. ASLRRA and its member railroads are thoroughly reviewing the issue, and the requested extension will aid in our ability to meaningfully answer the questions.

ASLRRA respectfully asks the Board to grant the ACC/TFI motion for an extension of the procedural schedule.

Respectively submitted,

A handwritten signature in cursive script that reads "Sarah Yurasko".

Sarah G. Yurasko
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September 17, 2021