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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Ex Part No. 711 (Sub-No. 1)

Reciprocal Switching

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

On December 28, 2021, the Board issued a Notice of Public Hearing announcing that it would hold a public hearing on March 15 and 16, 2022, concerning the reciprocal switching regulations it proposed through the 2016 NPRM, Reciprocal Switching, STB Ex Parte 711 (Sub-No. 1), at 1 (STB served Dec. 28, 2021) (“Notice”). It also set a deadline of January 27, 2022 for notices of intent to participate in the public hearing. *Id.* On January 10, 2022, the Association of American Railroads, (“AAR”) requested a 75-day continuance of the procedural schedule in this matter, including a corresponding continuance of the public hearing currently set for March 15 and 16, 2022, in order to give interested parties sufficient time to meaningfully update the record in a proceeding that has been largely dormant since early 2017. The American Short Line and Regional Railroad Association (“ASLRRA”) supports AAR’s 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 question of reciprocal switching has been before the Board for over a decade. ASLRRA has participated in Docket No. EP 705, Competition in the Rail Industry ("EP 705"), Docket No. EP 711, Petition for Rulemaking to Adopt Revised Competitive Switching Rules ("EP 711"), and combined in Docket No. EP 711 (Sub-No. 1), Reciprocal Switching ("EP 711, Sub-No.1"). ASLRRA agrees with AAR's assessment that this proceeding has remained largely dormant since early 2017, and that sufficient time is necessary in order to prepare the updates needed to the evidentiary record. As the Board is fully aware, the short line railroad composition and traffic changes on a frequent basis as it responds to market and traffic demand. While ASLRRA is certainly in a position to speak to what was previously provided in this proceeding, more time is necessary for the Association to consult with its members to determine what additional or updated details would be informative for this proceeding.

ASLRRA supports AAR's 75-day extension request to the procedural schedule in this proceeding, including a continuance of the public hearing set for March 15-16, 2022.

Respectfully submitted,

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

Sarah G. Yurasko
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