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Cynthia T. Brown
Chief of the Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423

Re: Gulf Coast Passenger Service Between New Orleans and Mobile
STB Finance Docket No. 36496

Dear Ms. Brown:

Shintech Inc. and Shintech Louisiana has its U.S. headquarters in Houston, TX and has plants in 3 U.S. locations - Freeport, TX and Addis, LA and Allemania, LA. All three plants are served by the Union Pacific RR, which connects to the CSXT and NS for service into the eastern U.S. We rely on the freight rail service provided by CSX Transportation and Norfolk Southern for much of our shipments to our customers. I write on behalf of Shintech to express concerns regarding the impact on that freight rail service of Amtrak's proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama.

Shintech produces PVC and Caustic Soda and uses rail hopper cars and tank cars for distribution of about 90% of our finished product to north American customers. As for carload volumes, about 5500 loaded moves are handled in this corridor per year, and for each load, the car is returned to us in the reverse direction by the same railroads as an empty along the gulf coast corridor via CSXT and NS. Freight rail service is critical to the success of our business. The quality of service CSXT and NS provide makes rail the most efficient transportation modal alternative for us to maintain and grow our business.

CSXT and Norfolk Southern Railway Company have submitted evidence, including a Rail Traffic Controller study that shows the introduction of Gulf Coast passenger service between New Orleans and Mobile will cause significant harm to

freight service. This harm will manifest itself through decreased freight train speeds and delay as well as extreme operational variability. CSXT's local trains, the very trains that directly serve customer's facilities, will be hit the hardest. Shintech is deeply concerned about our ability to meet the demands of our customers and remain profitable if this harm to CSXT's freight rail service materializes. Railroad service over the last year has already been deteriorating due to weather and covid-related issues including the railroads inability to adequately staff their operations to handle our business. Now is not the time to put further restrictions and requirements on them that can only negatively impact their ability to keep the supply chain fluid.

Shintech does not oppose Gulf Coast passenger service and expresses no opinion on the merits of that service. However, it is important that the introduction of this passenger service does not decrease the quality of freight service provided by CSXT. It is our understanding that CSXT and NS have proposed infrastructure projects that would support Amtrak's desired passenger service while protecting the quality of freight service upon which Shintech relies. Shintech urges the Board to seriously consider the merits of these projects.

It is unfair for Amtrak to insist on operating passenger service without regard to the businesses it will share the corridor with. If Amtrak is permitted to commence passenger service without paying its own way, the cost of that service will inevitably fall on the shoulders of shippers. Shippers like Shintech will either be forced to turn to more expensive and less efficient alternatives to rail or will wind up subsidizing passenger service through increased rail service costs as CSXT and NS are pressed to add infrastructure to stem the degradation to freight service.

The Board has an obligation to protect the interests of all parties that rely on the national rail network, not just those of passenger rail. Amtrak's desire for access to the Gulf Coast Corridor with no strings attached is not only harmful to freight rail service, but untenable given the substantial funding it received from Congress last year. **Shintech** requests that the Board require Amtrak to fund and facilitate the construction of infrastructure projects so as to avoid any harm to freight rail service.

Respectfully submitted,

Steve Polito
Director of Procurement & Logistics
Shintech Inc./Shintech Louisiana, LLC

cc: FD 36496 Service List