

February 11, 2022

The Honorable Martin J. Oberman, Chairman  
Surface Transportation Board  
395 E Street SW  
Washington, DC 20423

Dear Chairman Oberman and Members of the Surface Transportation Board,

Illinois is the center of the U.S. freight rail network, with Chicago being North America's busiest rail hub and the world's third-busiest intermodal hub. One-third of the nation's rail cargo moves through the region and more than a quarter of freight rail cars and one-half of intermodal trains pass through Chicago.

As local leaders from America's most important rail-hub state, we want to thank you for your careful consideration of the issues before you and explain why we oppose forced reciprocal switching and think it moves our freight transportation network in the wrong direction.

As we've all seen firsthand in recent months, the supply chain is under intense strain and facing record demand. Railroads moved more intermodal volume in the first half of 2021 than in any other similar period. They've handled record volumes while being the most reliable and nimble piece of the supply chain. The Northwestern University Transportation Center here in Illinois found that railroads "responded well to rapid demand shifts, particularly in intermodal traffic" throughout the pandemic and noted that they can help lead the logistics industry in "what is certain to be a volatile future."

It is worth noting that railroads have established resilient networks and service through consistent private spending on infrastructure—investments that average about six times that of the average U.S. manufacturer. This spending is crucial for the businesses that rely on efficient rail service and the communities that benefit from the economic activity stimulated by rail access.

By the same token, policies that disrupt freight rail service, like mandated switching, could negatively impact communities like ours. The train operations involved in a switching operation are complex, meaning that widespread use of this practice could lead to massive inefficiencies that reverberate across the network, no doubt aggravating existing supply chain challenges.

The policy creates a clear disincentive to continued high levels of railroad spending. Forced switching will dissuade investment by creating uncertainty about whether a given railroad may be compelled to cede traffic and revenues to a competitor, despite its ownership of the infrastructure and the vast amounts of capital required to maintain and improve it.

Several major rail shippers, like Illinois-headquartered Hub Group, have agreed that less switching leads to better rail operations and have opposed forced switching in the past. An additional factor to consider is the potential adverse effect on passenger rail operations, which rely on host freight railroads. Amtrak has stated that it is particularly concerned with the impact of switching in Chicago, its most important connecting hub.

In Illinois there are 52 separate freight railroads operating over 6,883 miles of track and moving over 500 million tons of freight annually. These rail freight movements take over 28 million trucks off our state roads every year, preventing 12.5 million tons of greenhouse gas emissions. With intermodal shipments and farm products making up the majority of freight rail shipments beginning in Illinois, it's clear how important these rails are for local manufacturers and producers.

Freight transportation is changing rapidly, as e-commerce and technological innovation roil the goods movement landscape. Railroads face steep competition, not only from each other, but also from other modes like trucks. Mandates that subvert rail service disadvantage customers and ultimately push freight to taxpayer-funded roadways. In the long term this threatens the ability of railroads to keep investing at high levels into their infrastructure.

Communities across Illinois and Chicagoland specifically stand to bear the negative consequences of forced switching were this rule to be passed. We urge you to consider these various factors and reject the proposed rule EP711-1.

Sincerely,

Hon. Terri Bryant  
State Representative, District 58  
Illinois Senate

Hon. Lamont Robinson  
State Representative, District 5  
Illinois House of Representatives

Hon. Margaret Croke  
State Representative, District 12  
Illinois House of Representatives

Hon. Larry Walsh, Jr.  
State Representative, District 86  
Illinois House of Representatives

Hon. Marcus C. Evans, Jr.  
Chair, Committee on Labor and Commerce  
Illinois House of Representatives

Richard "Rick" Johnson  
President  
Illinois Association of County Engineers

Hon. Edgar Gonzalez, Jr.  
State Representative, District 21  
Illinois House of Representatives

Illinois Chamber of Commerce

Hon. Mike Marron  
State Representative, District 104  
Illinois House of Representatives

Hon. Peter Silvestri  
Commissioner, District 9  
Cook County

Hon. Tony McCombie  
State Representative, District 71  
Illinois House of Representatives

Hon. Michael Skala  
Board Member, District 5  
McHenry County

Brad Tietz  
Vice President of Government Relations  
Chicagoland Chamber of Commerce

Reggie Greenwood  
Executive Director  
Chicago Southland Economic Development  
Corporation

Kevin O'Keeffe  
Executive Director  
Bolingbrook Area Chamber of Commerce

Hon. Byron Sigcho-Lopez  
Alderman, District 25  
City of Chicago

CC: Illinois Congressional Delegation