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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

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

Reciprocal Switching

**AMENDED NOTICE OF THE ASSOCIATION OF
AMERICAN RAILROADS' INTENT TO PARTICIPATE AT
THE MARCH 15–16, 2022 HEARING**

Kathryn D. Kirmayer
Timothy J. Strafford
J. Frederick Miller Jr. (admitted in MD)
Association of American Railroads
425 Third Street, SW
Washington D.C. 20024
(202) 639-2506

Benjamin J. Horwich
Teresa A. Reed Dippo
Munger, Tolles & Olson LLP
560 Mission Street
27th Floor
San Francisco, CA 94105-3089
(415) 512-4066
Ben.Horwich@mto.com

Henry Weissmann
Erin J. Cox
Giovanni Saarman González
Munger, Tolles & Olson LLP
350 South Grand Avenue
50th Floor
Los Angeles, CA 90071-3426
(213) 683-9100

March 4, 2022

Counsel for the Association of American Railroads

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Pursuant to the Board's December 28, 2021 Notice of Public Hearing and in light of the Board's March 1, 2022 order with instructions for the public hearing, the Association of American Railroads ("AAR") respectfully amends its January 27, 2022 Notice of Intent to Participate at the March 15–16, 2022 Hearing. AAR anticipates presenting its views through the testimony of the witnesses identified below.

Ian Jefferies: Ian Jefferies is President and Chief Executive Officer of AAR. His testimony will include brief introductory remarks that address policy issues raised in AAR's prior filings in this proceeding, including its recent supplemental comments.

Michael R. Baranowski: Michael Baranowski is a Senior Managing Director at FTI Consulting. He previously submitted a verified statement in support of AAR's initial comments on October 26, 2016. AAR anticipates that Michael Baranowski will elaborate on, among other topics, revised analyses he will have performed using updated data to assess the potential scope and impact of the proposed rule as well as additional analyses relevant to the Board's consideration of the proposed rule.

Jonathan Orszag: Jonathan Orszag is a Senior Managing Director and member of the Executive Committee at Compass Lexecon. He previously served as an Economic Policy

Advisor at The White House from 1997 to 1999, and as Assistant to the Secretary and Director of the Office of Policy and Strategic Planning in the United States Department of Commerce from 1999 to 2000. AAR anticipates that Jonathan Orszag will elaborate on his economic evaluation of the Board's proposed rule, including, among other topics, his assessment that the proposed rule does not promote competition, would likely decrease—not increase—total social welfare, and may jeopardize critical future investments by railroads in their networks.

Mark Fagan: Mark Fagan is a Lecturer in Public Policy at the Harvard Kennedy School, Harvard University. He previously submitted a verified statement in support of AAR's initial comments on October 26, 2016. AAR anticipates that Mark Fagan will elaborate on the flaws of the proposed rule from a public policy perspective, including as it relates to current issues affecting the global supply chain.

Debra J. Aron: Debra Aron is a Vice President in Charles River Associates' Competition Practice with extensive experience around competition policy, including in the telecommunications industry. AAR anticipates that Debra Aron will elaborate on the lessons from competitive access policies in the telecommunications industry that the Board may wish to consider as it evaluates the proposed rule.

Benjamin J. Horwich: Benjamin Horwich is outside counsel for AAR in this proceeding. AAR anticipates that he will address issues raised in prior and supplemental comments in this proceeding related to the Board's proposed rule, including its legal deficiencies.

AAR believes that the 75 minutes allotted for its presentation in the Board's order of March 1, 2022 remains appropriate.

Dated: March 4, 2022

Respectfully Submitted,

/s/ Benjamin J. Horwich

Kathryn D. Kirmayer
Timothy J. Strafford
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425 Third Street, SW
Washington D.C. 20024
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Teresa A. Reed Dipbo
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Counsel for the Association of American Railroads