

ENTERED
Office of Proceedings
March 15, 2022
Part of
Public Record

March 15, 2022

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

Dear Honorable Board Members,

As local leaders from Tennessee we are concerned about policies that affect logistics in our state and wanted to convey our opposition to the proposed rule on reciprocal switching (EP 711-1) prior to the Board's March public hearing.

The close relationship between Tennessee and the railroads goes back 160 years. Today 28 different railroads operate in Tennessee including six Class 1 railroads and 22 short line operators. Our 2,600-mile rail network benefits every Tennessee business, industry, manufacturer, and consumer. It is especially critical for supporting our state's booming automotive industry, like the Nissan assembly plant in Smyrna and nearly 1,000 automotive suppliers that use rail to make their operations more productive.

As one of the nation's most vital rail hubs and a nexus for east-west freight, Tennessee has seen firsthand the challenges associated with the supply chain in recent months. Among other modes, freight railroads have stood out for their steady reliability, moving record intermodal volumes throughout the pandemic. It's in this context that we oppose the proposed rule on reciprocal switching, which could constrict rail service and investment in Tennessee.

Requiring railroads to let competitors use their infrastructure at potentially below-market rates would have wide-ranging adverse impacts on train operations, slowing service for shippers. Further, forced inefficiency would push shippers away from rail and jeopardize the ability of railroads to earn enough capital to continue spending what is necessary to maintain and grow Tennessee rail infrastructure.

We understand that a broad coalition joins us in opposing the rule on reciprocal switching. Amtrak has said that the policy could slow its operations, like the New Orleans line through Memphis. The Intermodal Association of North America and major intermodal shippers have said it would affect network velocity and lead to deterioration in the rail network.

We appreciate your consideration of these points as you deliberate. Forced switching would undermine railroad efficiency and investment at a time when we need to move our economy and supply chains forward. We urge you to reject the proposed rule.

Sincerely,

Paul Bailey
Senator, District 15
Tennessee General Assembly

Richard Briggs
Representative, District 7
Tennessee General Assembly

Dan Howell
Representative, District 22
Tennessee General Assembly

Glen Jacobs
County Mayor
Knox County

Becky Massey
Senator, District 6
Tennessee General Assembly

Mark Pody
Senator, District 17
Tennessee General Assembly

Art Swann
Senator, District 2
Tennessee General Assembly

Sam Whitson
Representative, District 65
Tennessee General Assembly

CC: Members of the Tennessee Congressional Delegation