

304129

March 14, 2022

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

ENTERED
Office of Proceedings
March 17, 2022
Part of
Public Record

Dear Chairman Oberman and Members of the Surface Transportation Board,

The Oklahoma Department of Transportation (ODOT) projects freight in Oklahoma to increase nearly 50% over the next 30 years. Most of this growth, they note, will occur in longer trips and through-state traffic, notably the freight that moves on any of Oklahoma's 18 freight railroads.

We write in opposition to the proposed rule on forced reciprocal switching (EP 711-1) with these predictions in mind. The policy would undermine a key piece of our infrastructure network at a time when we need it more than ever.

Railroads are critical economic corridors for communities across the state, moving nearly 300 million tons of freight annually, the equivalent of 16.3 million truckloads that would otherwise travel on public roadways. The goods moving by rail in Oklahoma touch all parts of the state's economy, ranging from bulk materials like nonmetallic minerals and fracking sand to wind turbine blades to farm products.

Furthermore, Amtrak service on the Heartland Flyer facilitates passenger traffic between Oklahoma City and Dallas-Fort Worth, helping to ease congestion on local highways. It's worth pointing out that freight railroads own 70% of the lines used by Amtrak, which itself opposes forced reciprocal switching for its potential to cause disruptions to passenger routes. Between freight and passengers, over 16 million vehicle trips are removed from Oklahoma roadways by rail every year, reducing pollution and saving taxpayer dollars through reduced wear and tear.

We are primarily concerned that this regulatory effort could greatly cut into capital spending by the railroads. By compelling railroads to make their operations less efficient, the policy would push shippers away from rail and toward competitors. This in turn hurts the ability of railroads to earn what is required to maintain a capital-intensive network. The result for Oklahoma businesses would be slower rail operations and fewer overall transportation options.

Supply chains are changing rapidly. One of the reasons for this is the advancement of technologies that make the transportation landscape more competitive than ever. ODOT notes this trend in its freight plan, writing that truck platoons could divert traffic from rail and add to future congestion. The plan also emphasizes that railroad companies—set apart by their self-funding of infrastructure—will need to continue growing their networks to address future traffic increases.

But forced switching fails to acknowledge these realities. It would undermine railroad efficiency and investment, exacerbate current supply chain challenges, and threaten the long-term health and sustainability of Oklahoma's rail network. Thank you for considering our concerns.

Sincerely,

Hon. John Browne
Mayor
City of McAlester

Rodger Kerr
CEO
Altus Chamber of Commerce

Hon. Anthony Moore
State Representative
Oklahoma House District 57

Barby Myers
President & CEO
Claremore Area Chamber of Commerce

Roy Williams
President & CEO
Greater Oklahoma City Chamber

Sherry Jordan
President & CEO
Edmond Chamber of Commerce

John McGinley
President – Retired
Amerities Holdings, LLC

William Murphy
President & CEO
Ardmore Chamber of Commerce

Hon. Daniel Pae
State Representative
Oklahoma House District 62

Sherri Wilt
President
Bartlesville Chamber of Commerce

CC: Members of the Oklahoma Congressional Delegation