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# STB Hearing: EP 711 (Sub No. 1)

March 15, 2022

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**Jill Mulligan**

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**BNSF Railway Company**



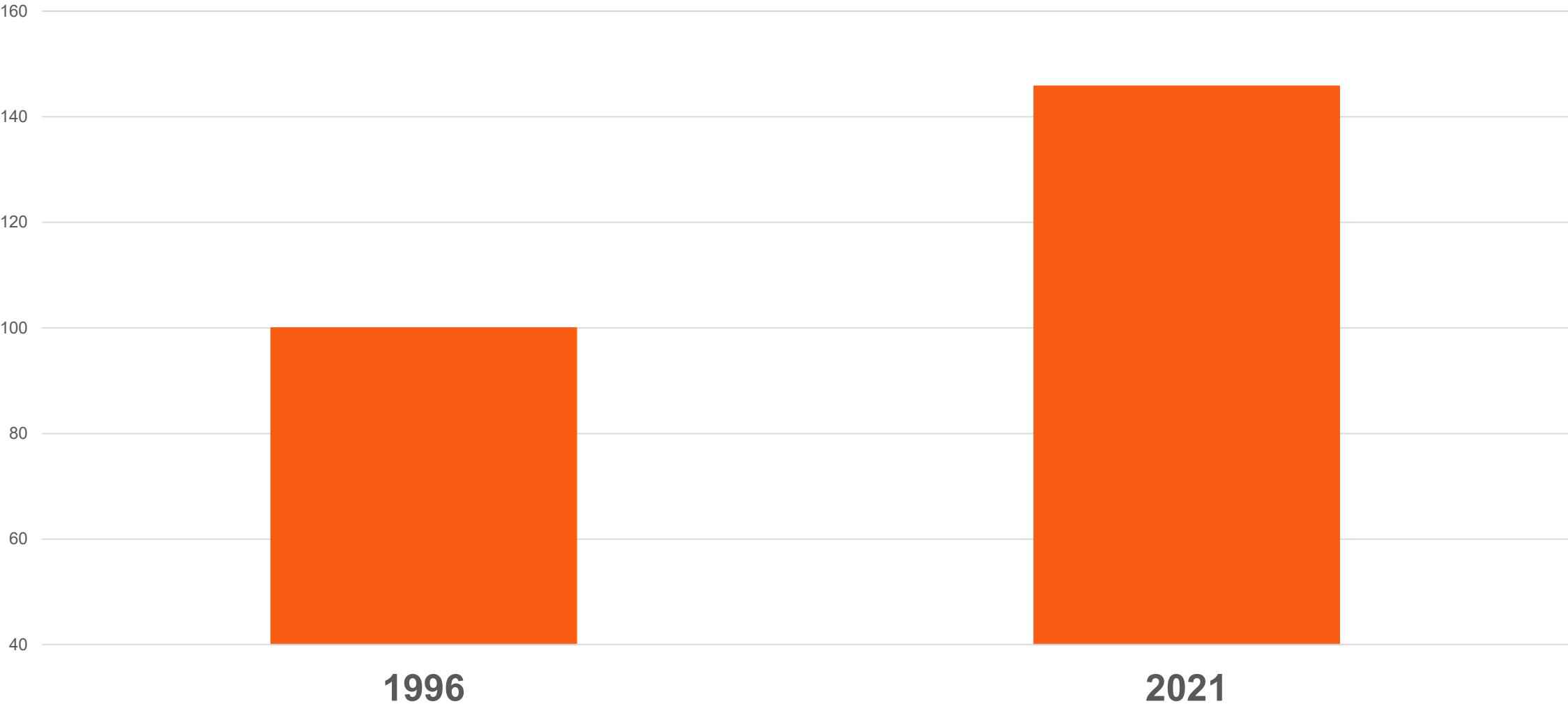
# Key Comments



- Board regulation should be limited to circumstances where market forces fail to function properly. The Board's proposal would trigger action without showing of competitive harm.
- The Board's proposal would disrupt competitive market dynamics that have driven BNSF's growth.
- The Board proposal would not accomplish the Board's goals to effectively address (a) high rates, (b) service issues, or (c) complex adjudicatory process.
- The Board must consider all relevant market forces, including product and geographic competition, before granting relief.

# BNSF Rail Volume

*(Indexed to 1996)*



# Predominant BNSF Grain Traffic Flows

