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

Re: Forced Reciprocal Switching (EP 711)

Dear Chairman Oberman and Members of the Surface Transportation Board:

As you may be aware, Kansas is one of the leading freight rail states in the country. In many ways Kansas was built on the railroads. Cities like Kansas City, Wichita, Topeka, and Hutchinson have been important rail hubs for over a century. Across the state, 16 railroads operate on the sixth largest state rail network in the U.S., hauling 327 million tons of freight annually. This network supports Kansas businesses and economic development, facilitating the movement of consumer goods, chemicals, agricultural products, and many other cargoes across our state and the North American rail network.

With freight demand expected to grow 30% nationally by 2040, all modes of transportation will be asked to move more. While other modes will seek federal funding to meet growing demand, freight railroads operate almost exclusively on infrastructure they own, build, maintain, and pay for themselves - investing an average of \$25 billion annually back into the national rail network.

I write today to urge you and the respective Board Members to oppose the proposed rule on forced reciprocal switching (EP 711) as it would undermine the Kansas rail network and harm the businesses and communities that benefit from moving freight by rail.

Today, rail removes more than 18.2 million truckloads annually from Kansas roadways, reducing greenhouse gas emissions as well as the burden on taxpayers who fund roadway maintenance. Indeed, increased rail service will help bring the nation closer to an environmentally sustainable logistics system, as transportation is the single largest source of greenhouse gas emissions in the U.S., accounting for 27% of total emissions according to the EPA. But rail contributes just a fraction of these emissions, less than 2%, while moving 40% of U.S. long-distance freight volume (measured by ton-miles).

Freight railroads are also an American success story and provide a valuable lesson in the transformational impact of smart regulation. Since railroads were able to enter the private marketplace in 1980, they have reinvested approximately \$740 billion in private capital back into their infrastructure while holding rates shippers pay for rail service at an average 43% lower than they were in 1981 (when adjusted for inflation).

Mandated switching could upend this trend of success. Railroads purposely concentrate and move traffic along certain routes to maximize operational efficiencies and network fluidity. Their routing practices, honed over decades, consider the health and operation of the entire network, which benefits all customers.

Removing network and switching control from the railroads will compromise efficiency, increase delivery times, and negatively impact a logistical network that is currently struggling to meet demand. With truck driver shortages and congestion at ports nationwide struggling to process freight, why risk disrupting the one component of the logistics system that is currently working?

Businesses across Kansas rely on swift, predictable shipping options to meet their customers' requirements. By forcing railroads to comply with reciprocal switching regulations, the STB is likely to jumpstart a chain reaction that constricts rail service and business activity at a time when the nation is struggling to recovery from the pandemic.

I urge the Board to oppose the proposed rule on forced reciprocal switching (EP 711). In short, policies that are good for freight rail are good for our communities, our environment, and the economic growth of Kansas. Thank you for your time and consideration.

Respectfully submitted,

**PTMW, Inc.**

A handwritten signature in blue ink, appearing to read 'Ashley L. Bettis', is written over a light blue horizontal line.

Ashley L. Bettis, President

CC: Honorable Jerry Moran  
Honorable Roger Marshall  
Honorable Tracy Mann  
Honorable Jacob LaTurner  
Honorable Sharice Davis  
Honorable Ron Estes  
PTMW File