

ENTERED  
Office of Proceedings  
April 22, 2022  
Part of  
Public Record

**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

---

**Docket No. EP 711 (Sub-No. 1)**

---

**RECIPROCAL SWITCHING**

---

**Summary of Ex Parte Meeting Between the American Short Line and Regional Railroad  
Association and Surface Transportation Board Vice Chair Michelle Schultz**

**April 13, 2022**

ASLRRA Attendees: Chuck Baker, President; Sarah Yurasko, Senior Vice President Law & General Counsel; Michael Ogborn, Senior Advisor

STB Attendees: Michelle Schultz, Vice Chair; Michael Small, Attorney-Advisor

---

ASLRRA thanked Vice Chair Schultz for her time and the opportunity to meet.

ASLRRA summarized the points made in its April 4, 2022 supplemental comments, which were in response to the line of questioning from Chairman Oberman and Member Fuchs regarding how much overall freight rail network traffic would be excluded from reciprocal switching if a reciprocal switching rule were to be issued that excluded short line traffic, with the addition of the clarifying wording that ASLRRA has suggested.

ASLRRA analyzed data and determined that a little over ten percent of freight rail traffic would be excluded if the Board determines to promulgate the proposed reciprocal switching rule with short line traffic excluded.

Vice Chair Schultz asked if the rule, if promulgated as proposed, would have any impact on short line railroads. ASLRRA responded that the rule would impact overall network fluidity and thus short lines as almost all short line originated and terminated traffic moves on the Class I network at some point. Given this reality, short lines would still not be totally immune from the effects of the rule even if they were explicitly excluded. However, it is anticipated that excluding traffic moving on short line railroads should shield short lines from the most severe effects of the rule.

Vice Chair Schultz asked if there is any relationship between this proceeding and the issues raised in the first-mile/last-mile (FMLM) docket, EP 767. ASLRRA responded the issues raised in the FMLM docket are not related to the issues raised in this docket from a short line perspective. ASLRRA referenced its comments in EP 767 that short line service is not a concern and there is no uniform metric that could capture the diversity of short line railroads. ASLRRA also suggested that if in fact a FMLM rule is promulgated that would affect Class I movements, it would perhaps make sense to treat a Class I/short line interchange point as a customer destination for purposes of FMLM reporting.

Vice Chair Schultz shared that the Board values the short line railroads and the service that they provide to the network as a whole. She stressed that the Board would like to avoid unintended consequences in any proceeding that could harm the short line segment.

ASLRRA thanked Vice Chair Schultz and her staff for their hard work on this complex issue.