

ENTERED
Office of Proceedings
April 25, 2022
Part of
Public Record

SURFACE TRANSPORTATION BOARD
Ex Parte 711 (Sub. No. 1)

**Summary of Ex Parte Meeting Between The National Grain and Feed Association
and Surface Transportation Board Vice Chairman Michelle Schultz**

April 15, 2022

NGFA Attendees:

- Max Fisher, Chief Economist and Treasurer
- Tom Wilcox, Transportation Counsel to NGFA

STB Attendees:

- Michelle Schultz, Vice Chairman
- Michael Small, Attorney Advisor

Meeting Summary

The NGFA representatives thanked Vice Chairman Schultz for the opportunity to further discuss the Board's 2016 reciprocal switching proposal. Vice Chairman Schultz thanked NGFA for meeting with her and offering NGFA's perspective. Mr. Fisher provided some additional information about the usefulness of existing interchanges and switching arrangements for NGFA members who could benefit from reciprocal switching. It was generally discussed how existing interchange points and yards where railroads currently perform reciprocal switching could be beneficial to grain shippers. The NGFA representatives also talked with the Vice Chairman about how reciprocal switching involves competing issues and can affect the network as a whole.

The Vice Chairman and NGFA also engaged in a discussion about the applicability and implementation of a "fault based" standard for reciprocal switching, and the extent to which finding fault to order reciprocal switching was better considered in the context of emergency service orders under 49 USC 11123 than switching for competitive reasons under 11102.

The meeting concluded with Vice Chairman Schultz thanking NGFA for meeting with her and the NGFA team thanking the Vice Chairman for her time.