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4/25/22

Ms. Cynthia T. Brown  
Chief, Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E. Street S.W., Room 1034  
Washington, DC 20423-0001  
Cc: "All Parties of Record have been served"

ENTERED  
Office of Proceedings  
May 11, 2022  
Part of  
Public Record

Re: Surface Transportation Board Decision Docket No. FD 36472 Pan Am/CSX

Dear Ms. Brown,

Whittemore Company is a 3rd generation family business that has been a rail customer since 1949. Located in the Lawrence, MA. Industrial Park, our Company processes two natural minerals, perlite and vermiculite, for use in the horticultural, construction and industrial markets. We are the oldest continuously operating perlite expansion plant in the United States and celebrated our 100<sup>th</sup> anniversary in 2019. Whittemore employs 37 people, most of whom are Lawrence residents. We also employ inmates from the Essex County Work Release Program.

Historically, we have received deliveries directly to our plant twice per week from Pan Am. Once the Pan Am/CSX merger announcement was made, our service significantly declined to receiving deliveries only once or twice per month. In addition, it took Pan Am in a number of cases, over 100 days to return empty rail cars to connecting rail roads. This resulted in delayed shipments of raw materials to our plant because our suppliers had no empty cars to refill. This has greatly impacted our business, forcing us to fully shut down production lines on numerous occasions.

Due to the unique characteristics of raw perlite and vermiculite, transloading is not an economical option. Unlike some other bulk materials, these two minerals are very susceptible to breakdown, require a belt conveyor and expensive dust collection equipment, and therefore cannot be transported pneumatically. The cost of transloading would be exorbitant and something Whittemore could not absorb. The potential loss of rail shipments directly to Whittemore's plant would drastically impact the company's ability to survive.

As mentioned above, rail is critical to our operation. With the upcoming take over by CSX, we please ask that our service level returns to the twice per week deliveries we've historically received.

If you have any questions, please reach out to me directly.

Jeffrey Sheehy  
Whittemore Company, Inc  
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