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

Dear Chairman Oberman and Board Members: RE: Docket No. EP711 (Sub-No.2)

I am writing to express views and concerns on behalf of the Southern California Regional Rail Authority, which provides Metrolink commuter rail service in Southern California. The Southern California area is host to a complex high-density railroad network where Metrolink commuter trains, Amtrak intercity trains, Amtrak state-supported intercity trains, and BNSF and Union Pacific freight trains all operate and often share the same track and rail corridors.

The Surface Transportation Board's Proposed Rules on Reciprocal Switching would provide a process for Class 1 freight rail customers who believe they have inadequate service to petition the STB for reciprocal switching arrangements between Class 1 freight railroads to address those service issues and to provide metrics and data to measure those service issues. While at first glance, the Proposed Rules appear not to directly affect Metrolink, given the complex shared use rail network described above, Metrolink has several requests intended to preserve the safety, capacity and on-time performance of passenger rail service in Southern California.

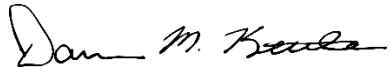
Metrolink requests that the STB in any Final Rules address issues that impact commuter and intercity passenger railroads. For example:

- When the STB is asked by rail customers to provide reciprocal switching arrangements, that all commuter and intercity passenger railroads that may be affected in the area receive formal notice of the pending proceedings and be allowed to comment and participate in the proceedings, as appropriate.
- Specifically, the STB in its case-by-case determinations should consider:
 - Impacts on shared use agreements between passenger and Class 1 railroads for usage of track and rail corridors by both passenger and Class 1 freight railroads, and



- Impacts on the passenger railroads that may arise from requiring Class 1 railroads to enter into reciprocal switching arrangements.

Respectfully submitted,



Darren M. Kettle
CHIEF EXECUTIVE OFFICER

