

**Surface Transportation Board
Ex Parte 711 (Sub-No. 2)—Reciprocal Switching**

Summary of Ex Parte Meeting held on November 15, 2023, between
American Forest & Paper Association
and Member Hedlund

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American Forest & Paper Association (“AF&PA”) Attendees:

- David Ross, Manager, Government Affairs, AF&PA
- Maria Komourdjian, Director of Transportation, Resolute Forest Products
- John Cribb, Manager, Sylvamo
- Ross Corthell, Vice President of Transportation, Packaging Corporation of America
- Julie Alsup, Director, International Paper
- Shannon Wiley, International Paper
- Tyne Brownlow, International Paper
- Mona Moorman, Domtar
- Karyn Booth, Thompson Hine LLP
- Richard Couch, Thompson Hine LLP

STB Attendees:

- Member Karen J. Hedlund
- Charles Vance

Meeting Summary:

The meeting began with introductions. AF&PA and its members thanked the STB Attendees for the opportunity to meet and discuss the Board’s proposed rule and the issues in this proceeding.

AF&PA acknowledged that the Board’s Reciprocal Switching Notice of Proposed Rulemaking (“NPRM”) was a step in the right direction to address inadequate rail service and that it also supports additional regulatory changes to increase competition in rail service more broadly. AF&PA proposed that the Board partially revoke the exemption for paper and forest products to allow shippers of those commodities access to the reciprocal switch rule. AF&PA added that many of its members ship these exempt commodities under rail transportation contracts.

AF&PA stated that the forest and paper products industry has experienced rail service reliability and car supply challenges for years. AF&PA emphasized that the exempt status of most paper and forest products minimizes options to address these challenges. One AF&PA member expressed concern that the NPRM metrics are based on extremely poor rail performance.

One AF&PA member stated that its service was episodic and highly variable, whereby it experiences inadequate service, followed by improvements, followed by inadequate service for varying periods of time. Because of this, the member expressed concern with measuring the 60% service reliability metric over consecutive 12-week periods as proposed in the NPRM. AF&PA

recommended that the Board consider a graduated reliability metric both early and late deliveries which would further incentivize railroads to meet their own OETAs. Member Hedlund stated that she appreciated the feedback.

One AF&PA member stated that there was a need to standardize rail data in a machine readable format.

AF&PA proposed that the Board add a “no show” metric to the ISP standards. AF&PA stated that its members have experienced substantial rail service challenges as documented in other STB proceedings and they have a need for the inadequate service remedy proposed in the NPRM. AF&PA members want to benefit from the NPRM and believe that exemption revocation would be consistent with the rail transportation policy and the public interest. Accordingly, AF&PA stated that it requests the Board to partially revoke the exemptions for forest and paper products in the final rule.

The meeting concluded with each side thanking the other for participating in the meeting.