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March 6, 2025

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The Honorable Patrick J. Fuchs
Chairman
Surface Transportation Board

The Honorable Michelle A. Schultz
Board Member
Surface Transportation Board

The Honorable Robert E. Primus
Board Member
Surface Transportation Board

The Honorable Karen J. Hedlund
Board Member
Surface Transportation Board

RE: Letter in Support of Petition for Reconsideration in Docket No. NOR 42144 et al.

Dear Chairman Fuchs and Board Members Primus, Schultz, and Hedlund:

The American Fuel & Petrochemical Manufacturers (AFPM) writes in support of American Chemistry Council, The Fertilizer Institute, Arkema, Inc., North America Freight Car Association, Ethanol Products, LLC d/b/a POET Biofuels, POET Nutrition, LLC d/b/a POET Bioproducts, Tesoro Refining & Marketing Company, LLC, Tesoro Great Plains Gathering & Marketing LLC, Dakota Prairie Refining, LLC, Valero Marketing and Supply Company, Valero Rail Partners, LLC, and Cargill Incorporated's petition for reconsideration of the STB's decision in *North America Freight Car Association v. Union Pacific Railroad*, STB Docket No. NOR 42144 et al. (Jan. 15, 2025) ("UP").

AFPM is a national trade association that represents nearly all American refining and petrochemical manufacturing capacity. These industries provide jobs, directly and indirectly, to more than three million Americans, contribute to our economic and national security, and enable the production of thousands of vital products used by families and businesses throughout the United States. AFPM is committed to the development of sound policies that enable our members to supply the fuel and petrochemicals that growing populations need to thrive in an environmentally sustainable way. Many AFPM members, which include several petitioners seeking reconsideration, own tank cars that are subject to Union Pacific's Tariff 6004-C, Item 55-C, under which Union Pacific charges tank car providers for movements of empty cars to or from repair facilities.

AFPM was a complainant in the STB's *UP* proceedings. While we are not petitioning for reconsideration, AFPM believes STB wrongly determined that Union Pacific's challenged conduct was lawful and therefore encourages the STB to grant reconsideration of its decision.

Respectfully submitted,

/s/ Richard Moskowitz

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CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2025, I filed the foregoing letter electronically via the Board's e-filing system and have served a copy of this letter by electronic delivery upon all counsels of record in these proceedings.

/s/ Richard Moskowitz
Richard Moskowitz