



Surface Transportation Board
395 E Street SW
Washington, DC 20423

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To Whom it May Concern:

Thank you for the opportunity to provide comments on the Surface Transportation Board's (STB) proposed rule "Updating Class I Rail Carrier Reporting Requirements", STB Docket No. EP 787 ("Proposed Rule" hereafter).

The International Dairy Foods Association (IDFA), Washington, D.C., represents the nation's dairy manufacturing and marketing industry, which supports more than 3.05 million jobs that generate \$52 billion in direct wages and \$779.45 billion in overall economic impact. IDFA's diverse membership ranges from multinational organizations to single-plant companies, from dairy companies and cooperatives to food retailers and suppliers, all on the cutting edge of innovation and sustainable business practices. Together, they represent most of the milk, cheese, ice cream, yogurt and cultured products, and dairy ingredients produced and marketed in the United States and sold throughout the world.

Perishable dairy products require strict temperature controls for food safety integrity. As a result, the U.S. dairy industry primarily uses trucks to transport these products. Fluid milk, cheese, yogurt, and other perishable dairy products must move quickly to their point of sale destinations, and trucks provide the flexibility, speed, and refrigeration capacity necessary to maintain product integrity and meet consumer expectations for freshness. That said, rail freight can be a cost-effective way to transport bulk dairy commodities, critical inputs, and long-distance shipments but service reliability challenges make it difficult for our industry to confidently use the rail system. While trucks cannot be replaced, especially for many farm to plant to market routes, the industry would benefit by having greater access to alternative modes of transportation. Improvements to rail service reliability would make it easier for our industry to use rail transportation for more types of shipments, potentially including perishable products that are now transported almost exclusively on trucks.

The U.S. dairy industry would greatly benefit from the STB's Proposed Rule to update the Class 1 rail carriers reporting requirements to focus on monitoring service reliability. When



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rail service is unreliable because of delays and scattered shipments, dairy products risk being lost and/or spoiled which can be considerably costly to both dairy processors and their farmer suppliers. By replacing outdated reporting requirements with new performance standards, such as on-time arrivals and industry spot-and-pull rates, the Proposed Rule would provide greater transparency into rail service quality. If properly implemented, more focus on reliability would benefit dairy shippers because it would strengthen supply chains, improve customer confidence, and ensure that consumers ultimately receive the safe, fresh dairy products they expect.

Ultimately, IDFA members believe that prioritizing service reliability is an appropriate action for the STB, as it will align regulatory oversight with supply chain logistic realities that food companies manage daily to get healthy, nutritious products to American consumers. IDFA and its members support this Proposed Rule because it could have substantial benefits for dairy manufacturers and farmers.

IDFA appreciates the opportunity to comment on the Proposed Rule and respectfully requests STB's consideration of these comments in any actions it implements. IDFA and its members would be happy to answer any questions you may have.

Sincerely,

Donald F. Grady
Senior Director, Legislative Affairs
International Dairy Foods Association