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Celanese Corporation

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Irving, Texas 75039

March 10, 2026

Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001

RE: Comments on Proposed Rule to Repeal Regulations on “Intramodal Rail Competition,” Docket No. EP 788

Dear Chairman Fuchs and Board Members Schultz, and Hedlund:

Celanese is proud to provide comments on the Surface Transportation Board’s (STB) proposed rule to repeal its regulations on “intermodal rail competition”.

Celanese is a 100-year-old, U.S. global engineered materials and chemical company headquartered in Irving, Texas. Celanese has operations in 27 countries that serve customers globally. Our products are vital to various industries ranging from agriculture, automotive & transportation, medical & pharmaceuticals, and electrical & electronics, just to name a few. The products Celanese makes possible include adhesives, vehicle parts, medical devices, appliances, food ingredients, and building materials.

To move our products to market, Celanese relies on various modes of transportation including trucking, ocean containers, waterways, pipelines, and rail. Across the U.S., Celanese has facilities in twelve states with nine rail-served facilities located in Clear Lake (1), Bishop (2), Orange (3) and Bay City (4), Texas; Enoree (5), South Carolina; Richmond (6) and Narrows (7), Virginia; Parkersburg (8), West Virginia; and Pensacola (9), Florida.

Each of these facilities is “captive” to a single Class-1 railroad except for our Bay City, Texas facility. Because of that, Celanese pays higher rates and receives suboptimal rail service, which often impacts product throughput.

Celanese strongly supports the full repeal of 49 CFR 1144, eliminating regulatory barriers that unnecessarily prevent the use of competitive tools to increase options and competition for rail shippers around the country. Specifically, repealing Part 1144 will advance the Trump Administration’s goal to remove regulatory barriers via Executive Order 14267 and streamline the ability for shippers to obtain competitive access under warranted circumstances.

Industry investment decisions are based on numerous factors including having readily available logistics options to deliver product to market. Celanese is proud of our legacy supplying crucial engineered materials and acetyl chain product for critical domestic applications Americans use every day, and have strengthened our commitment by recently making large investment decisions with the recent purchases of Exxon's Mobil's Santoprene Business and DuPont's Mobility & Materials Business. With consolidation in the rail sector in recent years, logistics optionality is nearly non-existent at existing sites, and as industry looks to expand. At a time when our industry faces many challenges, re-establishing pro-competitive policies will surely provide additional tools that will help American manufacturers stay competitive globally.

Celanese, consistent with trends across the shipping industry, is incurring higher costs while experiencing declining rail service performance. Those inflated costs and delays ultimately hit consumers. We commend the Trump Administration and their establishment of the Department of Justice Anticompetitive Regulations Task Force, which spent significant time with key stakeholders impacted by the overly burdensome policies of the past which ultimately impact every single American.

We believe the proposed repeal represents a reasonable approach to the problems of inadequate rail service. Celanese wholeheartedly agrees with the assertion in the docket that "a case-by-case approach under the applicable statutory standards would permit the Board to consider current rail operations, carrier revenue needs, concerns regarding the particular competitive situation, and other important issues."

As members of the American Chemistry Council (ACC), our comments strongly echo the comments of ACC: the existing regulation acts as an unwarranted barrier to competition that harms manufacturers and the American economy.

Celanese appreciates the opportunity to address the STB on this important topic, and we look forward to continued engagement on issues critical for shippers and our global customers in the future.

A handwritten signature in black ink, appearing to read "Landon Schale". The signature is fluid and cursive, with a large initial "L" and "S".

Landon Schale

Vice President, Logistics