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Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Docket No. EP 788 – Eliminating Regulatory Barriers to Competition: Review of Part 1144 Notice of Proposed Rulemaking

Arkema Inc., a specialty materials manufacturer and part of the global Arkema Group (Arkema), is pleased to provide comments to the Surface Transportation Board (STB) on the Docket No. EP 788 Eliminating Regulatory Barriers to Competition: Review of Part 1144 Notice of Proposed Rulemaking (NPRM). Arkema, with its unique set of expertise in materials science, designs materials to address the ever-growing demand for innovative and sustainable materials, including challenges such as new energies, new technologies, and others. As a leading manufacturer of these materials, Arkema depends on rail shipments every day to move both raw materials and final product.

Arkema operates 39 manufacturing sites across 23 states. Many of these sites are dependent on rail shipments and a number of these sites are captive to one railroad in some capacity or another. Because of this, Arkema has a vested interest in a regulatory approach that allows for the optimal use of competitive access remedies. Rail shippers, which include companies from many different industries, support STB efforts to allow reciprocal switching and/or other mechanisms aimed at ensuring competitive rail access.

As a member of the American Chemistry Council (ACC), Arkema fully supports and aligns itself with ACC's comments to this docket.

We appreciate your attention to this matter. Please do not hesitate to contact Steve Trombetta at stephen.trombetta@arkema.com with any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Steve Trombetta".

Steve Trombetta
Director, Logistics
Arkema Inc.