

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

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**STB Docket No. EP 711 (Sub-No. 1)
RECIPROCAL SWITCHING**

**INTERESTED AGRICULTURAL ORGANIZATIONS
SUPPORTING AND ALIGNING THEMSELVES
WITH THE REPLY COMMENTS
OF THE NATIONAL GRAIN AND FEED ASSOCIATION**

January 13, 2017

These Reply Comments are provided to inform the Surface Transportation Board (“Board”) that the eight national agricultural producer and agribusiness organizations – as well as the 16 State and Regional Agribusiness Associations affiliated with the National Grain and Feed Association (“NGFA”) – as listed below (“Interested Agricultural Organizations”),¹ support and wish to align themselves with the NGFA’s Reply Comments submitted on this date in response to the Board’s Notice of Proposed Rulemaking (“NPRM”) served on July 27, 2016 in this docket proposing revisions to the current rules governing the provision of reciprocal switching service pursuant to 49 U.S.C. §11102(c).

The undersigned Interested Agricultural Organizations strongly support the Board’s overall effort in this NPRM and the comments and recommendations embodied in the NGFA’s

¹ The identity and descriptions of each organization are summarized in Exhibit 1,

Reply Comments responding to Opening Comments filed by other interested parties, as well as the NGFA's recommendations to improve upon the NPRM.

The Interested Agricultural Organizations join the NGFA in urging the Board to proceed expeditiously to promulgate final rules in this proceeding.

Respectfully submitted on behalf of the Interested Agricultural Organizations,



Randall C. Gordon
President
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Exhibit 1

National Producer and Agribusiness Organizations:

American Farm Bureau Federation

Corn Refiners Association

National Council of Farmer Cooperatives

National Farmers Union

National Institute of Oilseed Products

National Oilseed Processors Association

National Pasta Association

North American Millers' Association

American Farm Bureau Federation is the country's largest general farm organization, with nearly 6 million member families and representing nearly every type of crop and livestock production across all 50 states and Puerto Rico.

Corn Refiners Association (CRA) is the national trade association representing the corn refining industry of the United States. CRA and its predecessors have served this important segment of American agribusiness since 1913. Corn refiners manufacture sweeteners, ethanol, starch, bioproducts, corn oil and feed products from corn components such as starch, oil, protein and fiber.

National Council of Farmer Cooperatives (NCFC), established in 1929, is the voice of America's farmer cooperatives. NCFC members are regional and national farmer cooperatives, which are in turn comprised of more than 2,500 local farmer cooperatives across the country. The majority of America's 2 million farmers and ranchers belong to one or more farmer cooperatives. NCFC members also include 22 state and regional councils of cooperatives.

National Farmers Union (NFU) has been advocating on behalf of American family farmers, ranchers, and rural communities since 1902. The organization is comprised of organized divisions in 33 states and has members in every state in the country. NFU seeks to advance smart farm policies and runs a series of educational programs that promote diversity and develop the next generation of family farmers. NFU supports sustainable production of food, feed, fiber and fuel, and will remain the respected, influential and independent voice on the future of American agriculture.

National Institute of Oilseed Products is an international trade association with the principal objective of promoting the general business welfare of persons, firms and corporations engaged in the buying, selling, processing, shipping, storage and use of vegetable oils and raw materials.

National Oilseed Processors Association (NOPA), established in 1930, has a mission to assist the U.S. soybean, canola, flaxseed, sunflower seed and safflower seed processing industries to be the most competitive and efficient in the world by utilizing the combined expertise, knowledge and resources of its members to foster market- and science-based policies. NOPA represents 12 member companies who process over 1.8 billion bushels of oilseeds annually at 63 plants in 19 states, including 57 plants that process soybeans.

National Pasta Association (NPA) is the trade association for the United States pasta industry. NPA's members are pasta manufacturers, durum wheat millers and suppliers to the US pasta industry. Founded in 1904, the NPA's mission is to increase the consumption of pasta, to promote the development of sound public policy, and to act as a center of knowledge for the industry and the consumer.

North American Millers' Association (NAMA) is the trade association of the wheat, corn, oat, and rye milling industries. NAMA member companies operate mills in 38 states, Canada and Puerto Rico, representing more than 90 percent of total industry production capacity.

State and Regional Agribusiness Associations Affiliated with NGFA:

Agribusiness Association of Iowa

Agribusiness Council of Indiana

California Grain and Feed Association

Grain and Feed Association of Illinois

Kansas Grain and Feed Association

Michigan Agribusiness Association

Michigan Bean Shippers

Missouri Agribusiness Association

Minnesota Grain and Feed Association

Nebraska Grain and Feed Association

North Dakota Grain Dealers Association

Ohio AgriBusiness Association

Oklahoma Grain and Feed Association

South Dakota Grain and Feed Association

Texas Grain and Feed Association

Wisconsin Agri-Business Association

Agribusiness Association of Iowa exists for the purpose of advocating, communicating and educating on behalf of a proactive, profitable, and environmentally responsible professional agribusiness industry. AAI's membership consists of over 1,100 business locations across the state of Iowa that supply feed, seed, crop protection chemicals, grain, fertilizer, equipment and additional products and services that benefit agriculture, as a whole.

Agribusiness Council of Indiana (ACI) has deep roots in Indiana's agribusiness community. Formed in 2001, ACI brings together two longstanding agribusiness associations: The Indiana Grain and Feed Association (formed in 1902) and the Indiana Plant Food and Agricultural Chemicals Association (formed in 1966). Today, ACI has approximately 400 member companies spanning the Midwestern grain, feed, fertilizer and ag chemical industries.

California Grain and Feed Association, established in 1924, is the nonprofit agricultural trade association that provides government representation, information, education, environmental and safety consultation and other services to the state's grain and feed industry.

Grain and Feed Association of Illinois is the statewide trade association for the grain and feed industry in Illinois. More than 90 percent of the commercial grain storage space in the state of Illinois is represented by members of the Grain and Feed Association of Illinois. Members range in size from multinational organizations to small, single facility operations. Membership of approximately 170 companies consists of country and terminal grain elevators, grain brokers, feed dealers, feed manufacturers, truckers, ethanol plants, and both corn and soybean processors. The industry directly employs just over 5,000 people. In addition, the Association has over 165 members allied to the grain and feed industry. They include banks, construction companies, futures brokers, accounting firms, insurance companies, equipment suppliers and others. This results in approximately 4,900 additional people indirectly employed by the grain and feed industry.

Kansas Grain and Feed Association is a 118-year-old trade association representing 98 percent of all commercially licensed grain storage capacity in Kansas. Its members own and operate nearly 1,000 grain storage and handling locations across the state.

Michigan Agribusiness Association (MABA), with roots dating to 1903, represents businesses that form the backbone of Michigan's agriculture sector – the second largest industry in Michigan – which employs more than 1 million people across the state and generates more than \$71 billion for its economy. MABA's diverse membership includes companies in the grain, fertilizer, crop protection, feed, transportation, milling and dry bean sectors. MABA members also include companies that process and sell food and food products, supply goods and provide services to every corner of the agriculture industry.

Michigan Bean Shippers is focused on providing services and advocating policies that further the interests of Michigan's bean shipping industry.

Missouri Agribusiness Association advocates for the business of agriculture while offering services and networking opportunities for the agribusiness community.

Minnesota Grain and Feed Association serves as a leader for the agribusiness industry with integrity, respect and innovation in its programs and services.

Nebraska Grain and Feed Association, established in 1896, was formed to promote the common business interests of the grain and feed industry; to seek and obtain improvement of business conditions of the grain and feed trade; to acquire and disseminate information to facilitate the proper conduct of business in the grain and feed trade; and to promote the general welfare of the association and its members.

North Dakota Grain Dealers Association is a statewide trade association representing the North Dakota grain, feed and grain-processing industries. Association activities are focused on providing services and advocating policies that further the interests of the commercial grain industry in North Dakota.

Ohio AgriBusiness Association is a state trade association whose member companies and their employees are committed to supplying modern agriculture with the basic needs and essential support necessary to grow Ohio's number-one industry. Its membership includes businesses in manufacturing, wholesale and retail, which represent business sectors including agronomic inputs (seed, plant food, crop protection), livestock feed and nutrition, grain marketing and operations, insurance, equipment and financial services.

Oklahoma Grain and Feed Association was organized in 1898 to foster the interests of its members; promote understanding; establish and maintain uniformity and equity in the customs, usages and practices of the grain and feed industry; provide valuable information; and protect the interests of the industry. The Association also engages in activities to benefit agriculture in general and the Oklahoma grain and feed industry in particular.

South Dakota Grain and Feed Association is a statewide, non-profit trade association composed of grain elevator firms and other agribusinesses involved in the grain, feed and farm supply business.

Texas Grain and Feed Association (TGFA) is comprised of almost 400 member firms that represent virtually every facet of the grain and feed industry. From country elevators and retail feed stores to the export elevator and large integrated and commercial feed manufacturers, TGFA members are an integral part of the agriculture industry in Texas. The diverse membership strengthens our voice, which is represented in nearly every legislative district in Texas.

Wisconsin Agri-Business Association consists of over 300 agribusiness companies, operating well over 1,000 branches and facilities, that do business in Wisconsin consisting of grain elevators, feed mills, seed developers and dealers, fertilizer and farm pesticide manufacturers, retailers and service providers, crop consultants, equipment dealerships, farm stores, ethanol plants, and many other agribusiness marketers and service providers.