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The Honorable Ann Begeman
Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

The Honorable Patrick Fuchs
Vice Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

The Honorable Martin Oberman
Commissioner
Surface Transportation Board
395 E Street SW
Washington, DC 20423

RE: Docket Number EP 757: Policy Statement on Demurrage and Accessorial Rules and Charges

Dear Chairman Begeman and Members of the Surface Transportation Board:

Archer Daniels Midland thanks you and the STB staff for your ongoing focus on the railroad industry's policies on demurrage and accessorial charges. As demonstrated by the Board's heightened focus on these issues, you recognize their importance. We urge your continued engagement moving forward.

For more than a century, the people of Archer Daniels Midland Company (ADM) have transformed crops into products that serve the vital needs of a growing world. Today, we're one of the world's largest agricultural processors and food ingredient providers, with approximately 40,000 employees serving customers in nearly 200 countries. With a global value chain that includes approximately 450 crop procurement locations, more than 330 food and feed ingredient manufacturing facilities, 62 innovation centers and

the world's premier crop transportation network, we connect the harvest to the home, making products for food, animal feed, industrial and energy uses.

To support ADM's array of businesses in North America, the company operates a private fleet of over 28,000 owned and leased railcars. ADM typically spends well over \$1.5 billion in annual rail freight which is associated with over 700,000 railcar shipments.

As the STB reviews the comments submitted pursuant to this notice, ADM wishes to call to your attention comments submitted by the National Grain and Feed Association, the Corn Refiners Association, the North American Freight Car Association, and Growth Energy. We support the comments submitted by these trade associations as they collectively cover the breadth of issues of importance to ADM.

ADM specifically calls to your attention the issue of reciprocity. Reciprocity is a touchstone issue for ADM and many shippers and it is a consistent theme of the comments referenced above. Reciprocity, simply stated, means that the policies and protocols that apply to shippers should apply equally to the railroads. Railroads should be held to the same standards when handling a shipper's asset as they hold a shipper when handling a railroad's asset. Reciprocity serves the shipper's interest of ensuring quick turnaround on shipper's assets just like demurrage serves railroad's interest of ensuring quick turnaround on railroad's assets. Should a railroad fail to meet the reciprocity standard, the shipper should be compensated in a manner and form commensurate with that enjoyed by the railroads.

Thank you for your continued focus on these critical issues.

Sincerely,

A handwritten signature in blue ink that reads "Christopher L. Boerm". The signature is fluid and cursive, with the first name "Christopher" being more prominent than the last name "Boerm".

Christopher L. Boerm
President, ADM Transportation