



"K" LINE AMERICA, INC.



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October 13, 2005

The Honorable Roger Nober
Chairman
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20426

Dear Chairman Nober:

Please allow me to introduce myself. My name is Toshio Suzuki. I am the President and CEO of "K" Line America, Inc, the U.S. agent for the ocean carrier commonly known as "K" Line. "K" Line is one of the leading ocean container carriers using the U.S. railroad system today, moving over 400,000 containers annually.

We are writing to support the continuation of the Staggers Act. Rail transportation is of vital importance to the nations economy and to "K" Line America. We utilize rail transportation to forward our containers from port to inland destinations, which would not be possible if we had to rely on truck transportation alone.

Prior to the enactment of the Staggers Act in 1980, the rail industry was in disarray with carriers in financial disrepair and unable to serve customers adequately. With the Staggers Act allowing railroads to have open competition the result was the industry finally becoming more customer focused. Since implementation, intermodal traffic has flourished and allowed all steamship lines to expand their service offerings from port areas to markets closer to final customers at inland locations.

With the growth being experienced in all transportation modes currently and rail in particular, capacity on the nations rail network has become very constrained. And the forecasted growth in the coming years will add further stress to the rail network. "K" Line America is expecting the volume of its containers that need to be railed to inland destinations to continue to increase as well and it is important that our rail partners are allowed to continue to operate in the environment that the Staggers Act created to move our containers in the most efficient manner possible.

If the rail carriers are forced to revert to dealing with customers the way they had to pre-Staggers Act, then their ability to invest capital to increase capacity will be greatly restricted. To meet the future growth demands the railroads must continue to enhance capacity through investments in their infrastructure. "K" Line America's traffic will need rail capacity to increase to prevent locations that are already bottlenecks from becoming worse along with having new bottlenecks created.

In summary, having a viable rail product is key to "K" Line America and will continue to be key in the future. Capacity is already constrained and will continue to be tested with growth that is expected in the future. To address "K" Line America's growth and service needs, as well as the nation as a whole, sufficient capital must be available and we cannot afford any action that will undercut the availability of this necessary capital.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "T. Suzuki", written in a cursive style.

Toshio Suzuki
President and CEO