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Hon. Martin J. Oberman, Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

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Dear Mr. Chairman and Members of the Surface Transportation Board,

We are concerned about serious harms to transportation systems and the supply chain in the Buckeye State that will result if the Surface Transportation Board approves a proposed rule on forced reciprocal switching (EP 711-1). Ohio is home to the third-largest freight rail infrastructure in the nation and hosts more intermodal facilities than all but two other states.

Our 41 railroads are a key economic asset that support manufacturing, agriculture, natural resource development, and international trade. Additionally, rail removes more than 16 million truckloads annually from Ohio roadways, reducing greenhouse gas emissions as well as the burden on taxpayers who fund roadway maintenance.

The switching rule under consideration would weaken the rail network that supports local development across Ohio. The supply chain is already experiencing slowdowns that present challenges to shippers. A new policy that complicates and further slows rail operations would be another obstacle at a difficult time for Ohio businesses that rely on swift, predictable shipping options to meet customer needs.

The proposed rule would give the federal government the authority to force privately owned railroads to open their infrastructure to competitors — not because it is the optimal route or because of any evidence of anticompetitive conduct. Over the long-term, mandated switching creates a clear disincentive to continued high levels of railroad spending. It will dissuade investment by creating uncertainty about whether a given railroad may be able to recoup its investment in track and infrastructure.

Forced switching will also reduce fluidity across Ohio's robust rail network. A single car switch could involve up to 6 days and 68 separate rail operations. When you consider the half-a-million railcar loads moving 300 million tons of freight across Ohio annually, it's plain that more switching will compromise rail service.

All sectors of the transportation network will be asked to move more with freight demand projected to rise 30% over the next two decades. As the only mode that will not seek federal funding to meet new demand, railroads almost exclusively self-fund the upkeep and growth of their infrastructure, investing on average \$260,000 per track mile according to the American Society of Civil Engineers (ASCE).

We've seen how resilient railroads can be—throughout the pandemic, amid supply chain challenges, and in the face of record demand. In fact, they handled more intermodal in the first half of 2021 than any similar period, an impressive statistic and one that resonates in intermodal-heavy Ohio.

We urge the Board to oppose the proposed rule on forced reciprocal switching (EP 711-1). In short, policies that are good for freight rail are good for our communities and the overall economic growth of Ohio.

Sincerely,

Hon. Teresa Bemiller
Commissioner
Knox County

Norm Blanchard
Executive Director
Guernsey County Port Authority

Hon. Thom Collier
Commissioner
Knox County

Jared Ebbing
Director
Mercer County Economic Development

Alexis A. Fitzsimmons
Executive Director
GROW Licking County

Dana Matz
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Zanesville-Muskingum Chamber of Commerce

Aaron Pauly
Economic Development Coordinator
Grow Ashland

Mark Policinski
Past Chairman
Ohio Rail Development Commission

Hon. Bill Pursel
Commissioner
Knox County

Hon. Michael Welch
Commissioner
Ashland County

Hon. Thomas Whiston
Commissioner
Morrow County

CC: Members of the Ohio Congressional Delegation