



December 17, 2021

Surface Transportation Board
Attn: Docket No. EP 767
395 E Street SW
Washington, DC 20423

Re: Comments for Docket No. EP 767

Dear Chair Oberman and STB Board Members:

On behalf of the Glass Packaging Institute (GPI), the North American trade association for the glass container manufacturing, raw materials and suppliers to our industry, I offer the following comments for Docket No. EP 767, regarding first-mile / last-mile (FMLM) service connected issues and data transparency.

Background

The US glass container manufacturing industry operates 43 container manufacturing plants, producing roughly 27 billion food, beverage and cosmetic glass bottles and jars annually. Furnace operations at the plants run year-round, 7 days a week/24 hours a day, outside of a brief annual maintenance period.

Glass container plants were strategically built and situated near rail lines in an effort to efficiently receive large quantities of raw materials to produce new bottles and jars. The glass container manufacturing companies and our raw materials supplier companies depend upon efficient, predictable and fair rail shipping policies. Rail service is a critical element of the glass container production and delivery processes.

First Mile/Last Mile (FMLM)

GPI supports greater transparency, distribution of data and other relevant information that the STB currently collects on FMLM service. While the STB currently collects some information in this area, information surrounding smaller shippers utilizing non-unit cars, often serving the glass container industry,

remains largely unknown.

FMLM metrics the association is most interested in better understanding are common railyard practices shared among the lines in these service areas, any related charges (particularly those connected to detention and demurrage), alongside new data points that may provide greater transparency on the impact Precision Scheduled Railroad (PSR), employed in some manner by all of the Class 1 rail lines.

Additional detail on FMLM service metrics would greatly assist, and inform, the entire rail shipping supply chain, along with the Board on future policies to be considered. In an aggregate format/report out, it would also not place confidential or sensitive company information in the public space.

We look forward to additional opportunities to engage with you and your staff at the STB on FMLM, and other critical rail-shipper issues as we move into 2022.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott DeFife", with a stylized flourish at the end.

Scott DeFife
President