

April 24, 2020

The Honorable Ann D. Begeman
Chairman
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423

The Honorable Martin J. Oberman
Vice Chairman
Surface Transportation Board
395 E Street S.W. 300573
Washington, D.C. 20423

The Honorable Patrick J. Fuchs
Board Member
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings
April 28, 2020
Part of
Public Record

Re: Docket No. FD 36369, Association of American Railroads - Petition for Declaratory Order

Dear Chairman Begeman, Vice Chairman Oberman, and Board Member Fuchs:

As representatives of America's grain and oilseed producers, we write in support of your decision to institute a declaratory order proceeding to consider the issues raised by the Association of American Railroads' petition filed in your docket number FD 36369. Uninterrupted movement of rail freight is integral to the function of our grain markets and exports, particularly given the current state of the agricultural economy. Clarity on the authority of the Interstate Commerce Commission Termination Act (ICCTA) of 1995 to regulate rail freight transportation is needed now to avoid regulatory uncertainty and the possibility of barriers to freight movement.

Further, we ask that the Board uphold and underscore the principles of unfettered rail freight shipment as established in the ICCTA. To that end, it is important to maintain a single governing authority for rail freight in order to maintain the seamless network needed for nationwide commerce. The ICCTA delegated that authority to the Surface Transportation Board (STB). The STB uses the authority granted by the ICCTA to act to provide clear and consistent nationwide policies regarding rail freight transport across state lines.

The STB serves an invaluable role in safeguarding trade, with responsibility for maintaining effective regulation of our railroads. Consistent federal regulation is a key component of maintaining uninterrupted transport of agricultural commodities.

Our railroads are a national asset, and certainly must be regulated with a national scope for the good of our nation. Thank you for your attention to this matter.

Sincerely,

American Soybean Association
National Association of Wheat Growers
National Corn Growers Association

Certification of Service

I certify that on April 28, 2020, I electronically transmitted a copy of the foregoing comments to all parties of record listed in the Board's Service List for STB Docket No. FD 36369.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Joshua Tonsager', with a stylized, cursive script.

Joshua Tonsager
Vice President of Policy and Communications
National Association of Wheat Growers
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Washington, DC, 20001
202-547-7800