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Testimony of:

L. J. Edwards

Site Manager of ISOFlex Packaging's Nashville, TN Manufacturing Operations

Presented to:

Surface Transportation Board

Regarding:

**Surface Transportation Board's Public Listening Session Regarding CSX
Transportation, Inc.'s Rail Service Issues**

October 4, 2017

My name is L. J. Edwards, I am the site manager of ISOFlex Packaging's Nashville, TN Manufacturing Operations. We want to thank the Surface Transportation Board for reviewing issues related to CSX's inability to maintain and provide acceptable rail service to its customers. We are respectfully asking that the Surface Transportation Board take every action possible to require CSX to restore acceptable rail service to all of its customers.

Our plastic manufacturing operations are part of the Sigma Plastics Group, the largest privately owned film extrusion group in the United States, Canada, and Central America. Based in Pompano Beach, Florida, the company has 40 manufacturing facilities, producing an annual throughput of approximately 2 billion pounds of resin and employs over 4,500. Sigma Plastics Group manufactures industrial film, agricultural film, commercial plastic film, stretch film, merchandise bags, T-Sacks, industrial trash liners, produce bags, hygiene films, garment bags, and food bags.

Since CSX implemented their internal cost savings initiatives our site has had severe issues with our rail service here in the Nashville area. CSX failed to inform us of any changes they were making in advance so that we could be prepared with alternatives if service interruptions were to occur. CSX has repeatedly failed to keep us informed of rail service delays. CSX has not been honest and forthright in their communication of the delays we have experienced. CSX's failure to communicate has left us with no ability to mitigate resin delivery interruptions and/or to plan for any adequate alternatives. This has resulted in us having to shut down part of our site's manufacturing operations on multiple occasions due to running out of needed resin. Unfortunately this has also negatively impacted some of our employees due to us not having sufficient work to keep them all working during some of the service interruptions. We have also missed multiple customer product shipments and that has negatively impacted our customer's operations as well.

The following is a listing of a few example CSX inquiries on railcar service delays that we have experienced during 2017 since CSX made changes to their operations.

- CSX Timely Delivery Failure: CSXT INQ1010509 Case: 000751350
- CSX Timely Delivery Failure: CSXT INQ1012734 Case: 000752380
- CSX Timely Delivery Failure: CSXT INQ1021333 Case: 000754946
- CSX Timely Delivery Failure: CSXT INQ1030258 Case: 000757728
- CSX Timely Delivery Failure: CSXT INQ1045137:
- CSX Timely Delivery Failure: CSXT INQ1047571 Case: 000763562

CSX has had some railcars in their Nashville area junction yard for more than ten days without getting them transferred to our local rail service company, Nashville Eastern Railroad. Multiple railcars have actually bypassed going to the CSX Nashville area junction yard and have been sent further south or north of Nashville due to CSX congestion issues.

In multiple cases CSX service representatives have communicated a transfer date to us and they have repeatedly failed to transfer the railcar as stated. Each and every time they have failed to give us advance notice and they have failed to provide any reason what so ever as to why the transfer did not take place has they had communicated to us earlier.

Rail service has historically been one of the safest and most efficient methods of transport. Unreliable rail service imposes significant financial burdens on our company due to plant shutdowns and having to expedite materials on site via other more costly transportation methods.

Since many CSX customers, like us, do not have alternative rail service providers we feel CSX has a responsibility to ensure any changes that they choose to make do not result in severe rail service interruptions to their customers. Additionally, CSX's customers should be able to rely on CSX to effectively and timely communicate any proposed or planned changes that could potentially affect their customers.

We have tried to reach out to CSX on several occasions in an effort to improve our rail service but thus far CSX has been unable to restore Nashville area rail service reliability back to an acceptable level. We are asking that the Surface Transportation Board force CSX to restore service back to previous service levels.

Sincerely,

L. J. Edwards

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Site Manager

ISOFlex Packaging Nashville, TN