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Cynthia T. Brown
Chief of the Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423

Re: Gulf Coast Passenger Service Between New Orleans and Mobile
STB Finance Docket No. 36496

Dear Ms. Brown:

The American Association of Exporters and Importers (AAEI) members rely on the freight rail service provided by U.S. rail carriers. AAEI would like to express concerns regarding the impact on freight rail service of Amtrak's proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama.

AAEI has been a national voice for the international trade community in the United States since 1921. AAEI represents the entire spectrum of the international trade community across all industry sectors. Our members include manufacturers, importers, exporters, wholesalers, retailers, and service providers to the industry, which is comprised of customs brokers, freight forwarders, trade advisors, insurers, security providers, transportation interests and ports. Many of these enterprises are small businesses seeking to export to foreign markets. AAEI promotes fair and open trade policy. We advocate for companies engaged in international trade, supply chain security, export controls, non-tariff barriers, import safety and other movement of good's issues.



AAEI's import and export company members rely on rail carriers to transport raw materials to facilities and finished products to their customers. Freight rail service is critical to the success of businesses large and small. Rail carriers provide AAEI members with access to two major port terminals in New Orleans and Mobile through which they can access greater domestic and international markets than would otherwise be available. In many cases, the quality of service that rail carriers provides makes freight rail the most efficient transportation alternative to maintain and grow U.S. trade networks.

CSXT and Norfolk Southern Railway Company specifically have submitted evidence, including a Rail Traffic Controller study, that shows the introduction of Gulf Coast passenger service between New Orleans and Mobile will cause significant harm to freight service. This harm will manifest itself through decreased freight train speeds and delay as well as extreme operational variability.

AAEI believes that it is important that the introduction of this passenger service does not decrease the quality of freight service provided by rail carriers. In the absence of quality freight service, AAEI members will be forced to turn to more expensive and less efficient alternatives to rail.

The Board has an obligation to protect the interests of all parties that rely on the national rail network, not just those of passenger rail. To drive a step-change in world competitiveness, there needs to be a focused effort to build effective supply chains to drive the U.S. economy and accelerate our U.S. goods to world markets. A long-term solution is needed in the United States to create a national intermodal supply chain plan.

We look forward to working with the Surface Transportation Board to address this growing problem.

Sincerely,

Eugene C. Laney
American Association of Exporters and Importers
President and CEO

cc: FD 36496 Service List