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February 14, 2022

By E-Filing

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

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Office of Proceedings
February 14, 2022
Part of
Public Record

Re: STB Docket No. FD 36496

Dear Ms. Brown:

International Paper is a leading global supplier of renewable fiber-based products. We produce corrugated packaging products that protect and promote goods and enable worldwide commerce, as well as pulp for diapers, tissue and other personal care products that promote health and wellness. We are headquartered in Memphis, TN and employ approximately 27,000 U.S. colleagues. We serve customers worldwide, with manufacturing operations in North America, Latin America, North Africa and Europe.

International Paper is proud to be a leading freight shipper across the United States, spending \$2 billion annually to move our products to customers domestically and from U.S. ports. We are the second largest exporter by volume, exporting 28% of our U.S. production. Additionally, we are a leading boxcar shipper moving more than 150,000 rail cars annually, plus 1.5 million outbound truck shipments.

As a major rail shipper, we appreciate the ongoing work by the U.S. Surface Transportation Board (STB) to evaluate supply chain issues of critical importance to both shippers and the nation's railroads that work tirelessly to move goods every day. The STB's work ensures that essential goods can flow efficiently through the network, which supports industrial manufactures and the broader U.S. economy.

I am writing today to share International Paper's perspective on the current fluidity of the supply chain network as the STB deliberates over the Amtrak Gulf Coast passenger line. We are witnessing an incredibly congested supply chain network— perhaps the most congested in history— across all modes, coupled with strong demand. We are experiencing disruption to our operations because of network issues preventing the flow of railcars to our mills. The rail corridor under consideration is of key importance as we move greater than 5,000 rail loads annually on this route.

As a result, we have real concerns about any surge in traffic that could add additional volume to the network. It is imperative that the STB consider the impact of additional

non-freight rail service to the tracks that are carrying goods for commerce during this critical time. Ensuring fluidity of the U.S. supply chain must include consideration of critical freight rail traffic.

We understand that this project has been under review for more than a decade and want to acknowledge that there are valuable positions held by stakeholders on all sides of this proposal, including from members of Congress. We believe rail travel is important but want to be clear that our concerns stem from the ongoing significant congestion issues with our supply chain network.

We are confident that the Surface Transportation Board will take a well balanced approach and identify a successful path forward for all parties. Separate from STB action, we encourage all stakeholders to seek opportunities to make any needed infrastructure upgrades through funding opportunities in the recently passed Infrastructure Investment and Jobs Act. Investing in infrastructure to increase capacity and performance would allow all stakeholders to succeed and ensure that the needs of the traveling public and manufacturers are balanced.

Thank you for your consideration of these important supply chain issues of importance to freight shippers and for your tireless work on rail network fluidity.

Sincerely,



Linda Bramblett
Director, North America Transportation

cc: FD 36496 party of record list