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October 9, 2019

Ms. Allison C. Davis
Director, Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

**Re: DOCKET NO. AB_1277_0_X -- SAVAGE DAVENPORT RAILROAD
COMPANY -- DISCONTINUANCE OF SERVICE EXEMPTION -- IN SCOTT
COUNTY, IOWA**

Dear Ms. Davis:

On October 4, 2019, we received from Savage Davenport Railroad Company ("SDR") a copy of the Surface Transportation Board decision in the above referenced SDR petition for exemption ("Petition") to allow discontinuance of service over a 2.8 mile rail line owned by the City of Davenport ("City") and leased to SDR (the "Line"). The decision came as a shock to us as we had never been notified of the Petition's filing.

The decision states that, "Petitions to reopen and stay the effectiveness of the exemption must be filed by October 15, 2019." *With this letter, Sterilite Corporation petitions the Surface Transportation Board to reopen and stay the effectiveness of this exemption.*

As background, in 2017, Sterilite selected the Davenport site to build a 2.4 million square foot manufacturing and distribution facility. As all of the facility's plastic raw materials are

transported by rail car, availability of reliable rail service at the site was a primary factor in selecting the site. The plant was constructed and equipped at a cost of \$120 million and commenced operations on April 1, 2018. Since that date, Sterilite has received approximately 625 rail cars of plastic raw materials over the Line serviced by SDR. The plant currently employs approximately 260 people. In the future, Sterilite plans to more than double the current volume of business supplied by the plant.

The City has advised Sterilite that it has issued a Request for Proposal (“RFP”) inviting interested rail operators to provide evidence of qualifications that would assist the City in selecting a company to succeed SDR as operator of the Track. The RFP process of identifying and securing a new operator for the Track is ongoing, with no date certain when a new operator will be providing service.

Sterilite is greatly concerned about the prospect of a discontinuance in service being granted prior to a new Track operator being in place. There is no economical alternative to shipping our raw materials by rail and therefore any disruption in continuous rail service would be logistically and financially detrimental to our business.

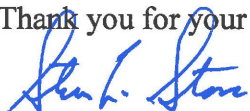
While SDR may have shown good cause to be relieved of the financial burden it has assumed while exercising its obligations to operate the Line, the subsequent effect on rail customers and their employees must also be taken into consideration.

Sterilite respectfully urges the Board to consider its timing in permitting discontinuance and the negative impact it would have on the heavily rail-invested Sterilite Corporation, as well as the

ability to attract future shippers who may become concerned about utilizing rail if precedent has been set which demonstrates that future discontinuance could threaten their supply chain. The public convenience and necessity would suggest that reasonable efforts need to be made to ensure that shippers are not adversely affected as a result of this proceeding.

While Sterilite does not inherently oppose SDR's Petition, it would be appropriate for the Board to delay the final decision or otherwise impose a condition withholding the final decision until such time that a suitable replacement operator can assume control of the Line without any disruption of service. The City of Davenport, State of Iowa, as well as the federal government all saw fit to invest money to construct this railroad facility to serve future businesses within the Eastern Iowa Industrial Center. Ensuring continuity of service across the Line will promote sound transportation policy that encourages continued future rail service investment by businesses and governments alike.

Thank you for your time and consideration.

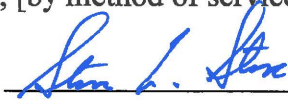


Steven L. Stone

Executive Vice President

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I certify that I have this day served copies of this document upon all parties of record in this proceeding, [by method of service consistent with 49 C.F.R. 1104.12(a)].

Signature:  Date: 10/9/19