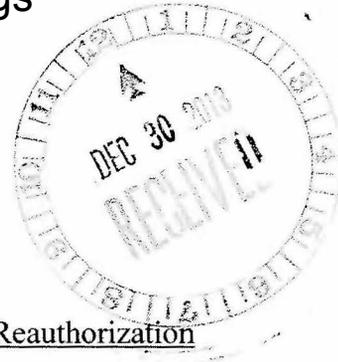


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December 23, 2013

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January 16, 2014  
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Ms. Cynthia T. Brown  
Chief, Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E. Street, S.W.  
Washington, DC 20423



RE: Finance Docket No. 27590 (Sub-No. 4)  
TTX Company – Application For Pooling Reauthorization

Dear Ms. Brown:

My name is Richard Stocking, and I am President and Chief Operating Officer at Swift Transportation Company (“Swift”). Swift is one of North America’s largest transportation companies with revenues over \$4.0 billion and a fleet of trucks exceeding 17,500. Our operations span the U.S., Canada and Mexico with a myriad of both over-the-road and rail logistics products. My role at Swift is to provide seamless, high quality services to our many customers across all of North America. My background at Swift includes 23 years of progressively increasing responsibility in nearly all segments of our business.

Intermodal services have become an important and ever-increasing part of our product offering. Intermodal allows us to combine the economy of rail with Swift’s over-the-road handling for seamless door-to-door service and savings. Proof of our commitment to this market is our fleet of over 8,800 domestic 53-foot containers. Swift also has a fleet of over 56,000 53-foot trailers capable of rail movement.

We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX’s flatcar pooling authority, because we rely on the smooth functioning of the TTX flatcar pool for the growth and success of our business.

Our reliance on TTX is significant:

- At Swift we offer a diverse network of origins and destinations. Having equipment available at any origin is critical. We know that TTX’s fleet free-flows throughout North America and can be distributed to handle any need that we might have throughout the U.S., Canada, and Mexico.
- TTX has kept pace with our quickly growing domestic container industry with 53-foot double-stack railcars. They efficiently transitioned from the once-standard 48-foot well to the now-standard 53-foot well without causing our company any set-backs.

- Our customers rely on the consistent availability of rail equipment in order to be competitive with over-the-road services. Since TTX takes the capital and ownership risk, expansion of the intermodal fleet with new and modified equipment has occurred more rapidly in response to market demands.
- The TTX pool eliminates car supply issues as a possible impediment to pursuing traffic opportunities.
- The size of TTX's fleet and its ability to move flatcars among rail carriers has allowed us to expand our business, relying on TTX's ability to fill the need for flatcars.
- TTX's proactive and efficient maintenance practices make TTX equipment more dependable and allow rail networks to operate more reliably, lowering our company's costs from delays due to malfunctioning equipment.

Intermodal transportation has grown dramatically, and its future expansion is critical to a healthy, productive economy. TTX's ability to achieve operational and maintenance savings creates lower car costs, which can be passed along to the shipper community, thus encouraging further growth of intermodal traffic. Increased use of intermodal transportation conserves fuel and reduces congestion and wear on our nation's highways. TTX's flatcar pool is the base upon which rail intermodal's success is built. The continued growth of intermodal transportation and the continuation of the TTX flatcar pool will improve our company's ability to operate successfully.

Swift Transportation Company fully supports a fifteen-year extension of TTX's pooling authority to ensure that the company will continue to supply efficient and economical flatcar service in the years to come.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Stocking", with a long horizontal flourish extending to the right.

Richard Stocking  
President and COO