



COSCO Container Lines Americas, Inc.

235412

December 13, 2013

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

ENTERED
Office of Proceedings
January 16, 2014
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Public Record

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

Dear Ms. Brown:

I am writing to you in support of TTX's application for a 15-year extension of TTX's flatcar pooling authority.

I am the Vice President of Land Operations for COSCO Container Lines Americas, Inc. (COSCO), headquartered in Secaucus, NJ. COSCO is a global transportation carrier that is heavily involved in the movement of containers to and from North America. We handle a wide variety of consumer and industrial goods, primarily between overseas locations and points throughout North America.

Rail-oriented intermodal is integral to our business activities in North America. We serve every major market in the U.S. and Canada by rail from many different ports. COSCO owns or charters the vessels it operates, but contracts with the railroads for services in the U.S. Railcar supply is a critical service component, as we offer a scheduled product that requires a reliable flow in order to support production line and distribution demands.

We understand that TTX is applying with the STB to extend its flatcar pooling authorization for 15 years. As in 2004, COSCO strongly supports an extension of TTX's pooling authority. A reliable, efficient supply of railcars is essential for our customer's supply chains and the stability of the intermodal product.

The TTX railcar pool has provided stability due to TTX's ability to react to rapid market demand shifts through effective fleet management and capital investment. TTX's structure ensures that cars flow freely between the railroads, car quality is maintained, and sufficient capacity is available to support fluctuating demand. Without a shared railcar pool, costs would rise, impeding the continued growth of intermodal transportation. More cargo would shift to the highway, increasing the cost of consumer products we use every day.

COSCO Container Lines Americas, Inc. considers the approval of TTX's application to be of great importance to the continued growth of our business.

Sincerely,

Ann Marie Papaccio
Vice President – Land Operations