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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:

I am the Assistant Port Director at Port Miami. My role at the port involves management of the smooth flow of containers and other cargoes on and off the port. Port Miami handles over one million container truck moves annually and is poised to grow rapidly in the near future. I have been with Port Miami since 2006, progressing through various positions in operations and management.

As I said above, Port Miami is preparing for growth that is expected to follow the 2015 opening of the expanded Panama Canal. Today, containerized goods from Asia cross the Pacific and often move through the Panama Canal to reach the East Coast but ship size is limited to about 4,500 twenty-foot equivalent units (TEUs). After expansion, ships capable of holding up to 12,000 TEUs will be able to move through the Canal. We believe that the improved economics of larger containerized vessels will bring more traffic to the East Coast. Of course the larger ships sit deeper in the water and will require at least 50-feet of draft; after our channel/harbor dredging project completes in 2015, Port Miami will be the only port south of Virginia able to accommodate these larger ships. Therefore, we expect to see increased throughput.

How will it all move? The Port has partnered with government and private enterprise to create a tunnel connecting the Port to I-95, but trucking has its limitations and other options are needed. To meet this challenge, the Port is also coordinating with the local railroad to build on-dock rail. This rail capacity will be a critical link to reach hinterland in a competitive, efficient and environmentally sustainable way.

PortMiami is the largest TIGER grand award winner to date for an on-dock intermodal rail system. Port Miami must rely on a smooth functioning rail product in order to handle the expected throughput with minimum rail footprint given land constraints on the Port.

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There will not be sufficient capacity available to switch different railcars to handle the outbound – we must be able to use the inbound capacity. We know that TTX railcars make this possible.

We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority, because it will strengthen the intermodal transportation system that links us to inland markets.

Some of the benefits we see from TTX include:

Benefits from TTX's Investment in Railcars: TTX facilitates continuing investment by the U.S. railroad industry in intermodal equipment supply, so that this vital need is not underserved in eras of high demand on railroad, port authority, and other capital sources such as government.

Benefits from TTX Management: The shared pool ensures that, whichever railroad is serving the Port or our regions, it will have access to a supply of railcars that meet intermodal shippers' needs, particularly double-stack cars with 40-foot wells. The TTX pool ensures that railroad and Port remain as fluid as possible, rather than being tied up by switching of cars of different ownership. The flexibility of the pool's operation will mean that as containerized traffic shifts between regions that the TTX capacity can shift with it.

Benefits in Promoting Growth of Intermodal Traffic: Intermodal transportation has grown dramatically, and its future expansion is critical to a healthy productive economy. Increased use of intermodal transportation conserves fuel and reduces congestion and wear on our local roads and national highways, and TTX's flatcar pool is the base upon which rail intermodal's success is built.

In conclusion, Port Miami is ready to grow to serve the needs of shippers and consumers, but TTX is important to our mission. Accordingly, we strongly support TTX's application for a fifteen-year extension of its pooling authority to ensure that TTX will continue to supply efficient and economical flatcar service in the years to come.

Sincerely,



Kevin Lynskey  
Assistant Port Director