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Surface Transportation Board
395 E Street SW
Washington, DC 20423

Docket No. EP 711 - 1

Dear STB Commissioners,

I am writing to you to express the food industry's support of the recent actions by the Surface Transportation Board with regard to "Alternative Access by the Class 1 Railroads" along with other initiatives that would enhance intermodal competition within the US Railroad network.

Ex Parte (EP) 711 Sub-No. 1, RECIPROCAL SWITCHING, outlines the significant changes that have taken place in the railroad industry since the Interstate Commerce Commission adopted rules for reciprocal switching in 1985. The EP also indicates that the agency has the power to change those rules. Most importantly, the EP sets forth a detailed proposal for a new regime of competitive switching, under which competitive switching would be made available to shippers who are served by on a single, Class I rail carrier.

National Frozen Foods ships frozen vegetables across the United States and North America. A healthy, well-functioning railroad network is critical to our success. Our shipments require refrigerated box cars, the majority are in private equipment that we lease. Our shipments move in carload quantities primarily from western US origins to eastern US destinations, and in order for us to remain competitive in the market place, we are committed to supporting rail transportation and a consistent, efficient carload/merchandise network.

National is in full support of initiatives that further competition amongst the railroads. Industry consolidation greatly increased the market power of the railroads in the past thirty-six years, since the passing of the Staggers Rail Act in 1980. At the same time, the weight of our commodities and long distances of our shipments naturally limit the intermodal (i.e., direct motor carrier or TOFC/COFC) options available to us. We strongly believe that by allowing alternative access by the competing railroads, it will allow shipper's more options, better service and ultimately a lower cost to the consumer.

We are in support of the STB initiative under EP 711 Sub-No. 1 (RECIPROCAL SWITCHING). We strongly urge the Board to move forward with implementation of the reciprocal switching initiative. National believes that the EP 711 Sub-No. 1 represents a fair and balanced effort to improve the state of competition in the rail transportation industry, and would provide increased competition for captive shippers without adversely impacting carriers. The control

that large railroads have over the shippers and consumers today is unfair and due to the lack of options available to shippers, is driving the cost up to the end consumers.

Widespread alternative access switching would create a more competitive posture for the rail industry which we believe is good for the economy and will drive out unnecessary costs and burdens being levied against the shippers today.

We respectfully request and hope that you will support "alternative access switching" for both the US shipping community and the American consumers.

Sincerely,

NATIONAL FROZEN FOODS CORPORATION

A handwritten signature in blue ink that reads "Brenna Watson". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Brenna Watson
Transportation Manager