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Cynthia Brown

Chief, Section of Administration

Office of Proceedings

Surface Transportation Board

395 E Street, SW

Washington, DC 20423

Re: STB Ex Parte No. 711 (Sub-No. 1), *Reciprocal Switching*

Dear Ms. Brown:

My name is Wallace Turner and I am the Transportation Coordinator for Runyon Industries. Runyon Industries strongly supports the adoption of new reciprocal switching rules that will help facilitate greater rail competition. My company has one facility that is served by a single class I rail carrier. Our facility is subject to substantially higher rail rates and less reliable service than our facility that have rail competition.

Our facility is service by the same switching crew that service other facilities that are open to reciprocal switching. One of our competitors is locate in the same city as Runyon that is open to reciprocal. We compete for the same ingredients from the same supplier and ship to the same customers.

We applaud the Surface Transportation Board ("STB") for opening this rulemaking proceeding and agree that new switching rules are needed. The rail industry today is vastly different than the industry of the 1980s and no shipper has ever obtained reciprocal switching under the current rules.

We encourage the Board to adopt new switching standards that will result in streamlined proceedings before the Board. If switching cases are too complex, timely and costly then the new rules will be ineffective and will not be used. We also believe that the Board should change its proposal to address the following:

- Shortlines should be able to benefit from the rule by serving as the interchange carrier.
- Interchanges that require minimal investment to be paid by the shipper or interchange carrier should qualify as a "working interchange".

- The Board should adopt reasonable and straightforward procedures to establish the access fee either when the railroads cannot agree on the fee or when the party seeking the switch believes the fee is not reasonable.
- When other facilities are open to reciprocal switching in the same switching district then all facilities should be open to reciprocal switching. The railroad already have a monopoly on your rail traffic.

We appreciate the Board's consideration of this letter and urge the agency to promptly adopt new reciprocal rules.

Respectfully submitted,


Wallace Turner

Transportation Coordinator

Runyon Industries

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