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

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ENTERED  
Office of Proceedings  
October 26, 2016  
Part of  
Public Record

October 24, 2016

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

Dear Ms. Brown;

My name is Kevin Acker and I am the Logistics Business Leader for The Chemours Company in Wilmington, Delaware. Chemours is the world's largest producer of titanium dioxide, a leading producer of fluoroproducts, and a leader in safe, efficient industrial chemical production. Chemours has 55 manufacturing and laboratory sites worldwide with 5,000 customers in over 130 countries and is serving key industries including: automotive, paints, plastics, electronics, energy and telecommunications. Chemours was created on July 1, 2015 from the Performance Chemicals Businesses of E.I. du Pont de Nemours and Company and we are proud of more than two centuries of experience in the chemical industry and of a rich history of innovation and industry-firsts.

Chemours has thirteen rail served manufacturing sites in the U.S. and all but three are served by a single Class I rail carrier. The ten captive manufacturing sites are burdened with substantially higher rail rates and less reliable service than the three facilities where we enjoy rail-to-rail competition. Two of our three competitive sites are open to reciprocal switching and one is dual served (Conrail shared asset site).

The sites where we enjoy reciprocal switching operate no less efficiently than sites where we are captive. There is no more, or less, congestion in local switch yards, and the rates we pay are competitive with the marketplace (because why would a carrier offer below market rates?).

What reciprocal switching does is give us choice. Choice to do business with a partner who shares our desire to grow. Choice to do business with a partner that values safety as we do. Choice to do business with a partner that values continuous improvement,

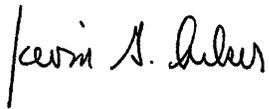
and choice to do business with a partner that recognizes competition makes all of us stronger.

Chemours strongly believes that new switching standards go a long way to promote the healthy carrier-to-carrier competition that is so lacking.

We are grateful to the Board for opening this proceeding and urge the agency to act promptly to adopt new reciprocal switching rules.

Thank you for your consideration of these comments

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kevin G. Acker". The signature is written in a cursive style with a large initial 'K'.

Kevin G. Acker