



October 27, 2016

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

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

Dear Ms. Brown:

On behalf of the I-69 International Trade Corridor Next Michigan Development Corporation (NMDC), I would like to express support of the adoption of new reciprocal switching rules that will help facilitate greater rail competition.

The I-69 International Trade Corridor is made up of 35 municipalities across the 4 counties of St. Clair, Lapeer, Genesee and Shiawassee. We also represent the Thumb Region of Michigan, consisting of three counties north of the I-69 corridor which include dozens of small municipalities.

Industries in our region are already feeling the impact of the shortage of truck drivers. Currently, 80% of freight volume moving into and out of the Thumb Region move by truck. The kind of access provided by the new switching rules is required and urgently needed. We believe it is important if we are to ensure reliable transportation service for existing industries in our region and to attract new industries for future job and economic growth. This is an initiative that will be a *Win/Win* for all parties, including the trucking companies that will be transitioned to regional and local moves, giving them the ability to address quality of life issues with their drivers.

We will be working with the carriers, including the railroads and trucking companies in the region, as the long haul business shifts from truck to rail. However, if the success of our initiative is to be sustainable, we need the railroads to continue to provide competitive rates and service if capacity becomes constrained.

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.



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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 reconsider the proposed rule which would exclude short line railroads from the proposed rules.

Two short line railroads, Great Lakes Central Railroad, and Huron & Eastern Railway/Genesee & Wyoming, is an integral part of the rail network in the corridor. Short line railroads should have the opportunity to benefit from the rules by serving as interchange carriers.

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

Sincerely,

A handwritten signature in dark ink, appearing to read 'Dale Kerbyson', with a long, sweeping horizontal flourish extending to the right.

Dale Kerbyson, Chairman  
I-69 International Trade Corridor  
Next Michigan Development Corporation

/DLK