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VIA E-FILING

Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

Re: STB Ex Parte No. 724, United States Rail Service Issues

Dear Ms. Brown:

Archer-Daniels-Midland Company (ADM) has been experiencing considerable rail service problems, those problems are continuing, and we respectfully request that the Surface Transportation Board (STB) engage in appropriate actions to facilitate service improvements as soon as possible.

ADM is one of the world's largest processors of agricultural commodities and a leading manufacturer of value-added food and feed ingredients. We are pleased that the STB elected to hold a public hearing to hear from the railroads and their customers on the status of rail service, and in particular, the railroads' specific plans and timelines to resuming service back to normal as soon as possible. ADM's operations are classified into three primary business segments: Oilseeds Processing, Corn Processing, and Agricultural Services. At over 270 processing plants and more than 470 sourcing facilities, ADM trades, transports, stores, and processes corn, oilseeds, wheat, and cocoa into products for food, animal feed, industrial, and energy uses. ADM requires efficient rail transportation service to meet its essential business needs in transporting a large portion of the bulk commodities that we ship to and from these plants and facilities.

During a significant portion of 2013 and continuing through now, many of the ADM facilities have been experiencing considerable rail service problems. We have been in constant communications with the carriers over their service problems, which appear to be very widespread, system-wide in nature. We are experiencing multiple issues with getting cars spotted and significantly slow transit times at many of our facilities. Among other things, these failures have caused us to cut processing (including

crush reductions of up to tens of thousands of bushels a day) due to a lack of adequate rail transportation of our commodities.

For example, we have had significant problems with Canadian Pacific Railway Company (CP) service. CP serves a number of ADM's essential plants and sourcing facilities in the upper-Midwest. Unfortunately, CP's response to date has been wholly unsatisfactory. ADM has yet to receive sufficient answers or a timeline on when its CP service will return to normal. We note that in this respect, it wasn't until February 10, 2014 that CP responded to Chairman Elliott's August 1, 2013 letter requesting its assessment of its ability to meet 2013 "fall peak" demands. Even then, CP merely reported certain "volatility" and then said that it "is well-positioned to handle" all demands.

In order for our production facilities to run at full capacity, ADM requires reliable rail service and we depend on our essential railroad service partners to meet our reasonable requests for service. ADM respectfully submits that the situation requires a full acknowledgement of the problems, and aggressive plans, actions, and dedicated follow-through. We are particularly concerned that, to date, we have not received adequate plans or assurances from CP on what will be done and when we can count on their service returning to normal.

We appreciate the STB's further exploration of this issue and assistance in ensuring that the carriers, and especially CP, are taking all reasonable actions to address the situation immediately, aggressively, and fully, and with a specific timeline on restoring service back to normal.

Sincerely,



Scott Fredericksen
President, Transportation Rail, Container
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