



# Harrison Gypsum, LLC

MAIN OFFICE: 1550 DOUBLE DRIVE, NORMAN, OK 73069  
PHONE: 405-366-9500 FAX: 405-366-9515

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December 13, 2012

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

ENTERED  
Office of Proceedings  
December 17, 2012  
Part of  
Public Record

RE: STB Docket No. EP714, Information Required in Notices and Petitions Containing Interchange Commitments.

Dear Ms. Brown:

I am a shipper on the Stillwater Central Railroad in Oklahoma and I would like to take this opportunity to comment on the above referenced matter.

I own and operate two gypsum quarries in Oklahoma that ship more than 350,000 tons annually to 26 cement plants nationwide. Twenty three of those plants are 200-plus miles from the quarries, and for those shipments rail transportation is the most economical and in many cases the only way to go. I could not begin to compete if I had to pay the large additional cost required by trucking my product. I lost my Class I rail service in the 1990's. My business was saved because short line railroad entrepreneurs bought the track and began operating a successful new local railroad. That sale was made possible only because the short line agreed to what is referred to as a "paper barrier." While it is true that two Class I connections may be better than one, it is also true that one connection is better than none. Even with the paper barrier in place the Stillwater Central has a lower cost structure and more flexible service than the Class I ever provided. That has allowed my business to grow and prosper. While on the surface it may appear that the proposals in Ex Parte 214 are pro-competitive, the real world tells a different story. Shippers like me cannot afford to lose their connection to the national railroad network. Transactions such as the one that created Stillwater Central are critical to our survival and if the imposition of the paper barrier makes the transaction economically feasible, the federal government should not do anything to jeopardize the transaction.

I appreciate the opportunity to present my view on this subject and hope that the Board will reconsider its recommendations in this matter.

Sincerely,

Russ Harrison  
President and CEO