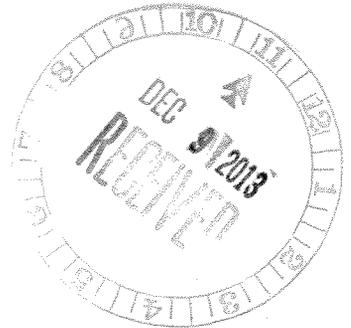




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January 16, 2014
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December 3, 2013

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

RE: Finance Docket No. 27590 (Sub-No. 4)
TTX Company – Application for Pooling Reauthorization

Dear Ms. Brown,

I am the Vice President of Rail for Mammoet USA. We transport large, heavy commodities and best serve our customers by managing how we move their products safely, damage free and on time. With smart solutions, we safely and professionally move deadlines forward, improve uptime and reduce cost of ownership. It is the challenge of pushing boundaries, creating new possibilities, and accomplishing the exceptional that moves us, as a team. While we transport many large and important products, the biggest thing we feel we move is time.

In North American, Heavy-Duty Railcars are those considered in excess of 4 axles with a combined capacity and tare weight greater than 286,000 pounds. Mammoet has a small fleet of Heavy-Duty Railcars with 8, 12, 18, 24 and 44 axles capable of carrying capacity from 200 to 1200 metric tonnes. The 18, 24 and 44 axle cars can be shifted horizontally and vertically which allows greater clearance opportunities when moving dimensionally-sized loads. All rail cars require a locomotive to pull and/or push cars from point to point.

Our rail department mostly focuses in the power generating and petro-chemical industries. We manage moves all throughout North America, as well as internationally between Europe, South/Central America, Asia and Australia. We utilize the heavy duty rail fleet for the majority of these shipments. This year alone we had over 100 shipments in rail.

With the highway infrastructure the way it is today, the use of rail has become more important than ever. In most cases it is physically impossible to move heavy loads over the roads. Environmentally speaking, it is much better to use the rail than transportation over the road.

Mammoet understands that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority, because we rely on smooth functioning of the TTX flatcar pool for the growth and success of our business and for our customers. We utilize the TTX pool for 90% of our shipments, keeping our small pool for small, time sensitive projects.

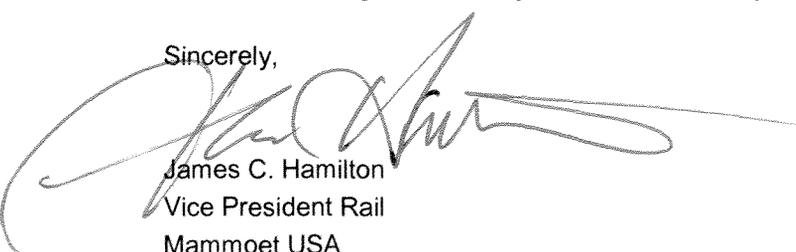


Our Supporting reasons include:

- TTX facilitates continuing investment by the U.S. railroad industry in flatcar equipment supply. TTX maintains their own fleet.
 - ❖ TTX facilitates investment in equipment that is vital to our business but might get overlooked by railroads given relatively infrequent use of heavy duty flatcars and other pressing investment needs. Our main objective is safety, while saving our customers time and money. TTX facilitates this for us.
 - ❖ Heavy duty flatcars are used relatively infrequently and absent TTX individual railroads might not have incentives to invest in these cars on their own.
- Our customers range all over North America, therefore a pool of shared flatcars ensures that cars can move freely across the rail network and are available for shipments on all railroads in all lanes.
 - ❖ TTX's pool of heavy-duty flatcars provides an indispensable resource.
 - ❖ When we are done with a car, it can be sent on any railroad to anywhere in North America for the next load; this flexibility allows cars to remain in revenue service, which reduces the rates we must pay for our relatively infrequent movements. When Mammoet completes a job and releases the empty car, the car is able to be loaded anywhere in North America on any railroad by maximizing efficiency of the entire fleet.
- TTX's continuing maintenance program provides high-quality, well-maintained flatcars and maintains them efficiently.
 - ❖ TTX's proactive maintenance program makes the heavy duty fleet more dependable and allows rail networks to operate more reliably, lowering Mammoet's costs from delays due to malfunctioning equipment. Example: the maintenance program all but eliminates the risk of excessive car cleaning or rejecting the equipment due to a small maintenance issue.
- TTX does not foreclose any other equipment supply options: If other equipment supply options – such as car leasing – could provide additional benefits, TTX would not prevent railroads from taking advantage of those options.

In conclusion, Mammoet wholeheartedly supports TTX's pooling authority which widely benefits the industry and Mammoet's goals of safety, cost, and efficiency.

Sincerely,



James C. Hamilton
Vice President Rail

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