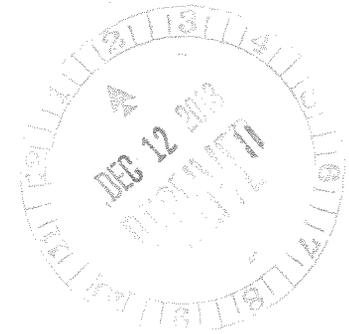




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Ms. Cynthia T. Brown  
Chief, Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E. Street, S.W.  
Washington, DC 20423

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

Dear Ms. Brown:

My name is Michael Reilly. I am the Director, Business Development, Intermodal Services for the Port of Tacoma. I have held this position for the last four and one-half years. My previous job at the Port of Tacoma was the Director of Container Terminal Contracts and I did that for three years.

Prior to joining the Port of Tacoma in 2006, I spent over 25 years in the Transportation and Logistics industries. While working in these industries, I held various levels of Sales and Operations positions that lead to Senior Management and Executive Management positions.

The Port of Tacoma is the ninth largest port in the contiguous United States handling 1,711,289 TEU's in 2012. One of the ten, best, natural deep water ports in the world, Tacoma lies at the western end of one of our country's most significant trade corridors.

The Port is a gateway port, meaning a very high percentage (estimated at 60+%) of the import containers handled by our port are moving on through bills of lading via rail destined to/arriving from inland destinations or origins. The majority of this traffic moves across the northern tier of the U.S. to/from Chicago and points east. Most of our traffic moves via doublestack rail equipment with some conventional and a few spine cars. In 2009, the Port of Tacoma started handling Domestic Intermodal (53' Containers) via our South Intermodal Yard. That business has grown dramatically and provides daily service to Chicago and the Midwest while providing connection with the CSX and Norfolk Southern to customers up and down the East Coast. This domestic business is continuing to grow and we have now added service to and from California on a daily basis. The domestic intermodal business is forecasted to continue growing in the high single digits for at least the next three years. One of the major reasons for the anticipated growth will be the conversion of long haul trucking to domestic intermodal. With respect to international intermodal, the forecast for that business is to be flat in 2014 and low single digit growth for 2015 -2017.

We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support the extension of TTX's flatcar pooling authority, because it will strengthen the Intermodal transportation system in which we are a vital link. The TTX pool ensures that the four on-dock Intermodal yards the Port of Tacoma has built remain as fluid as possible, rather than being tied up by switching of cars of different ownership. The availability of a shared pool of intermodal cars ensures that, whichever railroad our customers use, and whichever lanes our customers use, there will be open access to a supply of railcars.

The availability of a shared pool of intermodal flatcars increases rail-to-rail competition by eliminating car supply issues as a possible impediment to competition. Intermodal growth is important to the U.S. economy. The continued growth of intermodal transportation and the continuation of the TTX flatcar pool will increase our company and our customers' ability to operate successfully.

#### Benefits from TTX Investment in Equipment

- ❖ TTX has been able to respond rapidly to shifts in equipment demand with increased investment in particular equipment types. Over the last decade, TTX has cut down thousands of 48-foot intermodal cars to more efficiently handle the 20-foot and 40-foot containers used in international shipping.
- ❖ TTX facilitates continuing investment by the U.S. railroad industry in intermodal equipment supply, so that this vital need is not underserved in eras of high demand on railroad capital.
- ❖ Since TTX takes the capital and ownership risk, expansion of the intermodal fleet with new and modified equipment can occur more rapidly in response to market demands.

#### Benefits from TTX Management of a Pooled Fleet

- ❖ The TTX pool eliminates car supply issues as a possible impediment to a railroad pursuing traffic opportunities in competition with trucks or other railroads.
- ❖ TTX pool cars move across the railroad network without restrictions.
- ❖ The TTX pool accommodates seasonal, competitive, and other shifts in demand for intermodal flatcars.
- ❖ The availability of a shared pool of intermodal cars ensures that, whichever railroad we use, and whichever lanes we use, we will have access to a supply of railcars that are tailored to our needs, particularly double-stack cars with 40-foot wells.
- ❖ The size of TTX's fleet and its ability to move flatcars among rail carriers has allowed us to expand our business, relying on TTX's ability to provide a higher number of flatcars as needed.
- ❖ The TTX pool ensures that railroad terminals we use remain as fluid as possible, rather than being tied up by switching of cars of different ownership.

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#### Benefits from TTX's Efficient and High-Quality Maintenance

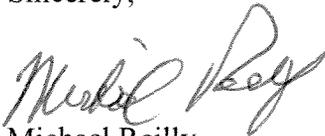
- ❖ TTX has demonstrated its commitment to provide a fleet of high-quality, well-maintained intermodal cars.
- ❖ TTX's experience and expertise in maintaining intermodal cars and its incentives to provide high-quality equipment ensure that our rail traffic moves with minimum disruption.
- ❖ TTX's proactive and efficient maintenance practices make TTX equipment more dependable and allow rail networks to operate more reliably, lowering our company's costs from delays due to malfunctioning equipment.

#### Benefits in Promoting the Growth of Intermodal Traffic

- ❖ Intermodal transportation has grown dramatically, and its future expansion is critical to a healthy, productive economy.
- ❖ TTX's ability to achieve operational and maintenance savings creates lower car costs, which can be passed along to the shipper community, thus encouraging further growth of intermodal traffic.
- ❖ Increased use of intermodal transportation conserves fuel and reduces congestion and wear on our nation's highways.
- ❖ TTX's flatcar pool is the base upon which rail intermodal's success is built.
- ❖ The continued growth of intermodal transportation and the continuation of the TTX flatcar pool will increase our company's ability to operate successfully.

We consider approval of TTX's application to be of critical importance to the continued growth and success of our business. Thus, we support TTX's request for a fifteen-year extension of its carpooling authority.

Sincerely,



Michael Reilly  
 Director, Business Development Intermodal Services  
 Port of Tacoma