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October 18, 2013
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October 15, 2013

Ms. Rachel D. Campbell
Director, Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC

VIA FACSIMILE: (202) 245-0457

RE: Docket No. EP 711, hearing scheduled for October 22, 2013.

Dear Ms. Campbell:

As you know, I filed a notice of intent to participate in the above hearing on behalf of Diversified CPC International, Inc., and I requested 10 minutes to discuss competitive switching issues. In the course of preparing my testimony, I realized that I inadvertently overlooked the requirement to confirm intent to participate, to request time, and to submit a summary of intended testimony by September 23, 2013.

Assuming the will proceed as scheduled and the Government Shutdown will end, the purpose of this letter is to confirm my intent to participate. My comments will focus on the following key points:

1. Incorrect statements presented in CSX reply comments regarding products manufactured by our client, Diversified CPC International, Inc.
2. The potential impact the competitive switching rules proposed by NITL will have on Diversified's rail operations.
3. Concerns regarding the practicality of the proposed requirement to prove market dominance; that rates exceed a 240% regulatory threshold.
4. The need to establish simplified procedures so the privilege of requesting competitive switching will be a practical option for all shippers, including small shippers.
5. The need to protect industries that are already open, from termination of reciprocal switching service without due process.

If you have questions or require additional information, you contact me at (219) 838-3800.

Sincerely,

A handwritten signature in black ink, appearing to read "Sandra J. Dearden", written over the typed name.

Sandra J. Dearden

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