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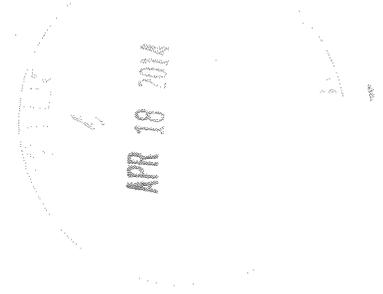
MICHAEL L. ROSENTHAL
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mrosenthal@cov.com

ENTERED
Office of Proceedings
April 18, 2014
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Public Record

April 18, 2014

BY HAND

Cynthia T. Brown
Chief of the Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001



Re: Finance Docket No. 27590 (Sub-No. 4),
TTX Company – Application for Approval of Pooling
of Car Service With Respect to Flatcars

Dear Ms. Brown:

As a supplement to TTX Company's Application in the referenced proceeding, I am enclosing an original and ten copies of TTX's Submission of Additional Statements of Shippers and Others in Support of the Application for Reauthorization of the TTX Flatcar Pool.

Please date-stamp the enclosed extra copy of this document and return it with our waiting messenger.

Thank you very much for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael L. Rosenthal".

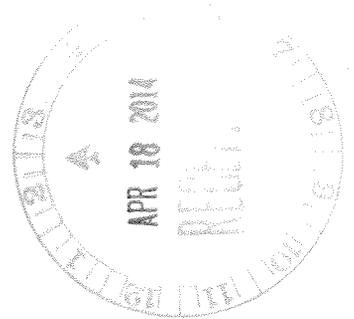
Michael L. Rosenthal

Enclosures

BEFORE THE
SURFACE TRANSPORTATION BOARD

TTX Company – Application for Approval of Pooling
of Car Service With Respect to Flatcars

Finance Docket No. 27590 (Sub-No. 4)



**TTX COMPANY'S SUBMISSION OF ADDITIONAL
STATEMENTS OF SHIPPERS AND OTHERS IN SUPPORT OF THE
APPLICATION FOR REAUTHORIZATION OF THE TTX FLATCAR POOL**

PATRICK B. LOFTUS
ANNE E. TREADWAY
SHANNON K. BAGATO
TTX Company
101 North Wacker Drive
Chicago, Illinois 60606
(312) 984-3838

MICHAEL L. ROSENTHAL
DEREK LUDWIN
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DAVID L. MEYER
ROBERT M. NICHOLS
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2000 Pennsylvania Avenue, NW
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Attorneys for Applicants

April 18, 2014

Contains Color Images

BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 27590 (Sub-No. 4)

**TTX COMPANY'S SUBMISSION OF ADDITIONAL
STATEMENTS OF SHIPPERS AND OTHERS IN SUPPORT OF THE
APPLICATION FOR REAUTHORIZATION OF THE TTX FLATCAR POOL**

TTX Company ("TTX") is submitting herewith 34 additional letters from shippers and other beneficiaries of the TTX flatcar pool urging approval of TTX's application for reauthorization of its flatcar pooling agreement.¹ These supporters include the National Industrial Transportation League, the American Short Line and Regional Railroad Association, railcar manufacturers and component suppliers, steamship companies, trucking companies, intermodal logistics companies, automotive companies, forest products shippers, steel products shippers, and ports. The accompanying letters are listed in the attached index.

¹ For the Board's convenience, we have collected in this filing letters that TTX received directly as well as letters that were submitted directly to the Board.

Respectfully submitted,



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Attorneys for Applicants

April 18, 2014

INDEX OF ADDITIONAL STATEMENTS SUPPORTING APPROVAL OF APPLICATION

<u>SUPPORTER</u>	<u>TAB</u>
AMERICAN ASSOCIATION OF PORT AUTHORITIES	1
ALLIANCE WHEEL SERVICES L.L.C.	2
AMERICAN HONDA MOTOR Co., INC.	3
AMERICAN SHORT LINE AND REGIONAL RAILROAD ASSOCIATION	4
A.STUCKI Co.	5
CALIFORNIA CARTAGE COMPANY, LLC	6
CHRYSLER L.L.C.	7
CLIFTON STEEL Co.	8
COSCO CONTAINER LINES AMERICAS, INC.	9
DART INTERMODAL, INC.	10
FREIGHTCAR AMERICA, INC.	11
HANJIN SHIPPING AMERICA, LLC.	12
HOLLAND, LP	13
J. BARD McLEAN, INC.	14
LOUISIANA-PACIFIC CORP.	15
MATSON LOGISTICS	16
NATIONAL STEEL CAR LTD.	17
NEW YORK AIR BRAKE, LLC	18
NYK LINE (NORTH AMERICA) INC.	19
PORT OF OAKLAND	20
VIRGINIA INTERNATIONAL TERMINALS, LLC (PORT OF VIRGINIA)	21
RAILWAY SUPPLY GROUP	22

<u>SUPPORTER</u>	<u>TAB</u>
RETAIL INDUSTRY LEADERS ASSOCIATION	23
RONSCO INC.	24
SSAB AMERICAS	25
STANRAIL	26
STRATO, INC.	27
SUBARU OF AMERICA, INC.	28
SUMITOMO CORP. OF AMERICA	29
THE NATIONAL INDUSTRIAL TRANSPORTATION LEAGUE	30
TRINITY EQUIPMENT CO.	31
UNITED ARAB AGENCIES, INC.	32
WELLS FARGO SECURITIES, LLC	33
YANG MING (AMERICA) CORP.	34

Exhibit 1

February 4, 2014

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:

The American Association of Port Authorities (AAPA) is an alliance of the 135 largest deep water ports in the Western Hemisphere (including more than 80 in the United States), and over 250 support firms and individuals engaged in engineering, finance, public works, etc. We work to protect and advance the common interests of our members as they connect their communities with the global transportation system. The letter is submitted on behalf of the U.S. members of AAPA.

AAPA supports an extension of TTX's flatcar pooling authority because our port members rely on the smooth functioning of the TTX flatcar pool for the growth and success of their operations.

Our membership has benefited from TTX's investment in intermodal cars (which has kept up with the incredibly rapid rise in containerized imports and exports over the past 20 years). Additionally, we know that TTX has cut-down thousands of 48-foot intermodal cars to 40-feet to more effectively handle the 20-foot and 40-ft containers used in international shipping, (and the shorter railcars substantially enhance the efficiency of port rail operations).

Likewise, our members benefit from the management of a pooled fleet. The TTX pool helps ensure that on-dock rail loading facilities and other terminals remain as fluid as possible, since the pool removes the requirement of switching cars of different ownership. Moreover, pooling reduces car supply issues as a possible impediment to ports competing with each other for traffic opportunities, as TTX's cars can freely interchange among rail carriers that serve the various ports.

In summary, the AAPA considers the approval of TTX's application to be of critical importance to our membership.

Sincerely,


Jean Godwin
Executive Vice President and General Counsel

Exhibit 2



Alliance Wheel Services L.L.C.
302 W. Holland St.
Washington, IL 61571

January 14, 2014

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 have been in the rail supply industry for 29 years and currently hold the position of President of Alliance Wheel Services LLC for the last 4 years. Prior to Alliance Wheel Services LLC I was Vice President of Operations for the wheel group at Greenbrier Rail Services for a year and was Executive Vice President of American Allied Railway for almost 20 years.

AWS is a reconditioner and assembler of freight car wheelsets. We currently supply wheelsets to TTX, short line railroads, car builders, Class I railroads, car owners and freight car repair facilities. AWS is a small business and is just one of a few companies that concentrates on providing reconditioning and assembly of freight car wheelsets. We believe the product and workmanship that AWS supplies to TTX and the entire rail industry is of the highest quality, which allows commodities being transported to be done in a safe and reliable manner.

We understand that TTX is seeking reauthorization of its flatcar pool. We are strong supporters of an extension of TTX's flatcar pooling authority, as we rely on their proactive and efficient maintenance practices of the flatcar pool to ensure rail transportation is safe and reliable and for the continued growth and success of our company.

TTX's continued investment in the rail industry and intermodal cars provides an efficient means of transportation that saves fuel, lowers transportation costs as well as keeping the nation's highways safer by lowering the number of large trucks on the roads.

TTX's commitment to a well maintained high quality fleet supports the rail industry during both the high and low cycles in our economy. That benefits not just our company but other suppliers as well as car repair facilities around the country. The TTX quality SECO helps us determine the quality of our products and services, but also improves the safety, reliability, and service provided by our nation's rail transportation system. The increase reliability and safety that TTX provides allows the railroads to run more efficient and at a lower cost.

We fully support the approval of TTX's application. The continued growth of TTX's flatcar and intermodal fleet is critical to our company's future growth and success. TTX's ability to achieve operational and maintenance savings creates lower costs which is passed on to the shipper community, thus encouraging further growth of intermodal traffic. The increase traffic provides more business opportunities for our company and our suppliers. We also believe TTX helps to support and improve our nation's rail transportation system.

Sincerely,

Robert Coup, President
Alliance Wheel Services, L.L.C.

Exhibit 3

HONDA

American Honda Motor Co., Inc.
1919 Torrance Blvd.
Torrance, CA 90501
Phone (310) 783-2000
Fax (310) 783-3900
<http://www.honda.com>

235409

ENTERED
Office of Proceedings
January 16, 2014
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December 20, 2013

Ms. Cynthia T Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E ST. SW
Washington, DC 20423-0012

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

Dear Ms. Brown:

I am writing to your office on behalf of American Honda Motor Co, Inc. automobile logistics.

I am National Manager, Sales & Logistics Planning, with responsibilities that include finished vehicle transportation network design. As part of that duty, my department at American Honda maintains a close business relationship with TTX as well as the U.S. Class 1 railroads.

American Honda currently has seven automobile manufacturing locations located in North America:

- Marysville, OH
- East Liberty, OH
- Greensburg, IN
- Lincoln, AL
- Alliston, ON, Canada
- Honda de Mexico, El Salto, Jal.
- Honda de Mexico, Celaya, Gto. (open 2014)

Together, these combined operations will manufacture approximately 1.5 million vehicles destined for the U.S. market. Approximately 80% of that volume will be transported via rail.

We understand that TTX is seeking reauthorization of its flatcar pool, and American Honda strongly advocates the extension of TTX's flatcar pooling authority, as it is a critical component to our growth and success. As an industry, we rely heavily on TTX to supply financial, consultative and analytical resources necessary to maximize the fluidity of the auto transportation rail network in North America.

Your consideration is greatly appreciated.

Sincerely,


Nick Digeralamo
American Honda Motor Co., Inc.
National Manager, Sales & Logistics Planning

Exhibit 4

RICHARD F. TIMMONS
PRESIDENT
AMERICAN SHORT LINE AND REGIONAL RAILROAD ASSOCIATION
50 F STREET, N.W., SUITE 7020
WASHINGTON, D.C. 20001-1564
(202-585-3442)

April 8, 2014

235869

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

ENTERED
Office of Proceedings
April 11, 2014
Part of
Public Record

APR 11 2014

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

Dear Ms. Brown:

I write today in support of the TTX Application For Pooling Reauthorization which is pending before the Board. As you know, the American Short Line and Regional Railroad Association represents over 485 Class II and Class III railroads and switch carriers who operate across North America. Our members benefit daily from the flatcar pool provided by TTX. Many small railroads own few cars of their own. Thus, the reliable availability of specialty flatcars from TTX allows our members to serve diverse customer needs knowing that needed flatcars will be available. Our small railroad members would be hard pressed indeed to obtain the flatcars were it not for the service provided by TTX. In addition, our member railroads have limited networks and are highly reliant on the pooling service offered by TTX. TTX is a key player in assuring a fluid national rail network across carrier platforms. Our small carriers rely on the availability of specialty flatcars to provide "first mile, last mile" service in what are often rural and economically fragile parts of the country.

For these reasons ASLRRA strongly supports TTX's application for a fifteen-year extension of its pooling authority to ensure that TTX will continue to supply efficient and economical flatcar service in the years to come for small railroads and the benefit of the larger economy as a whole.

Respectfully,



Richard F. Timmons, President
American Short Line and Regional Railroad Association

Exhibit 5



January 15, 2014

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:

As a preference to this letter I would like to take a moment to introduce myself. My name is William R. Kiefer and I am the president & C.E.O. of A Stucki Company. My educational background includes a degree in engineering with a minor in mathematics and a post graduate degree in business administration. My tenure in the railroad industry has included engineering, executive management and ownership of a number of railroad supply and repair companies.

A Stucki company holds ten railroad related companies in 14 locations in North America. These companies engineer and manufacture freight car components used in the dynamic control of the freight car which allow the car to operate safely at today's ever increasing speeds. A Stucki also engineers and manufactures braking systems for freight cars along with a myriad of other products that allow for the safe operation of freight cars. Other companies under the Stucki umbrella engineer and manufacture draft system components along with springs and various close tolerance machined parts and fabrications used in the construction and maintenance of various types of rail cars. Other divisions of A Stucki provide freight car repair services both at fixed shop locations and through a fleet of mobile repair vehicles.

It has recently come to my attention that TTX is seeking reauthorization of its flatcar pool. We vigorously support this extension as the TTX pool allows for the continued health of TTX which in turn assures the continued growth and strength of our nation's railroads. Today, the North America rail system is the most efficient and safest in the world. To that end, TTX has for many years supported A Stucki Company and the rail road supply community in general through its unwavering dedication to research and engineering which promote innovation and technically superior freight car operating systems and products. Each and every one of the A Stucki companies benefit from the support of TTX and the business they provide us through application of our many engineered freight car components and the repair and maintenance work they afford our service companies due to their high level of commitment to operating a fleet of high-quality and well maintained flatcars.

The flatcar pool operated by TTX continues to foster growth in this segment of the freight rail industry. Today the pool of TTX flatcars is more important than ever as it assures the economic and efficient movement of so many goods that are of the utmost importance to our economic recovery. The pool of flatcars operated by TTX is the foundation from which the intermodal industry grew and the continued expansion of intermodal



Table with 5 columns: A.Stucki Company USA, Independent Draft Gear USA, American Industries USA, Stucki de Mexico Mexico, Stucki do Brasil Brazil. Each column lists address, phone, and fax numbers.



Page 2

Ms. Cynthia T. Brown

(Con't)

RE: Finance Docket No. 27590 (Sub-No. 4)

TTX Company – Application For Pooling Reauthorization

transportation is guaranteed by the TTX's ability to achieve operational and maintenance savings which they pass along to shippers.

In closing I want to reiterate that I and the entire executive and management staff at A Stucki Company fully and strongly support the TTX's application for a fifteen year extension of its pooling authority thereby helping to insure that TTX continues to supply efficient and economical flatcar service for many years to come. We here at A Stucki Company feel confident that the continued success of TTX heavily contributes to the ongoing success of the rail system and more specifically intermodal transportation which helps assure the future and growth and longevity of A Stucki Company.

Respectfully,

A handwritten signature in black ink, appearing to read "W. R. Kiefer", with a flourish at the end.

William R. Kiefer
President & C.E.O.
A Stucki Company

Exhibit 6

March 31, 2014

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 Jim Gill and I am the Vice President for Business Development at California Cartage. We have been in business since 1944, and provide warehousing, cargo consolidation, and drayage. Currently, we operate over 4.25 million square feet of warehouse space through the United States and Mexico.

A major component of our business is transloading international freight from marine containers into 53-foot “domestic” containers. We are one of the larger firms that perform this service, and we believe that nearly one-third of all import TEUs (twenty-foot equivalent units) that discharge at the ports of Los Angeles and Long Beach transload *and* ship inland by rail. Transloading enables our customers (typically retailers), to better control their inventory and reduce costs. It also enables them to redirect inventory at the last minute. Additionally, we perform quality control inspections, product labeling, price tagging, and similar services.

We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX’s flatcar pooling authority, because we rely on the smooth functioning of the TTX pool flatcar pool for the growth and success of our business and because it will strengthen the intermodal transportation system that we serve.

There are a number of benefits that we, and our customers, receive from TTX. First, since 2004, there has been enormous growth in the amount of containerized imports coming into the U.S. and imports in the L.A. area increased by 50% (with a corresponding increase in intermodal volume). To support this substantial growth, TTX has consistently expanded its fleet to keep pace with the demand.

Moreover, TTX has kept pace with the right type of intermodal well car. The growth rates for imports, transloads, and intact shipments (i.e. shipping marine containers inland) are not homogeneous. TTX pays attention to the unique growth rates of these market segments and has been able to rapidly respond to shifts in demand with increased investment in particular

THE CALIFORNIA CARTAGE FAMILY OF COMPANIES



California Cartage Company | P.O. Box 92829 | Long Beach, CA 90809
www.calcartage.com | Tel: (888) 537-1432 | sales@calcartage.com

Transloading/Deconsolidation | Warehousing | Trucking | Contract Warehousing | CES

equipment types. Recently, transloading has grown at a much faster rate than imports into L.A. or Long Beach and TTX expanded its fleet of 53-foot well cars to accommodate this demand.

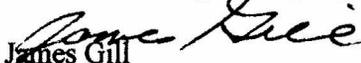
Likewise, we and our customers benefit from a pooled fleet as that helps increase rail-to-rail competition. Further, the availability of a shared pool of intermodal cars ensures that whichever railroad our customers (or their intermodal providers use), they will have access to a supply of railcars that are tailored to their needs.

Last, and again while we do not “buy” intermodal rail transportation we work on a daily basis with dozens of major retailers, steamship lines and trucking firms who do rely on it for the safe, efficient, and timely distribution of billions of dollars of goods. Part of the reason of intermodal’s success is its ability to provide low-cost and consist transportation, and TTX’s demonstrated commitment to providing high-quality, well-maintained, and low-cost cars, enables the railroads to provide that service.

In conclusion, we strongly support TTX’s application for a fifteen-year extension of its pooling authority to ensure that TTX will continue to supply efficient and economical flatcar service in the years to come. We consider approval of TTX’s application to be of critical importance to continued growth and success of California Cartage’s business.

Sincerely,

California Cartage Company, LLC


James Gill
Vice President

THE CALIFORNIA CARTAGE FAMILY OF COMPANIES



[Type text]

California Cartage Company | P.O. Box 92829 | Long Beach, CA 90809
www.calcartage.com | Tel: (888) 537-1432 | sales@calcartage.com

Transloading/Deconsolidation | Warehousing | Trucking | Contract Warehousing | CES

Exhibit 7



January 9, 2014

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceeding
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 Steve Tripp, Senior Manager of Chrysler's Worldwide Vehicle Transportation department. I am responsible for transportation policy, logistics engineering, procurement, operations and damage prevention for Chrysler finished vehicle transportation network. I have worked for Chrysler for 29 years in various logistics and supply chain roles and I am currently the Chairman of AILSC (Automotive Industry Logistics Steering Committee).

Chrysler uses the North American rail network to move finished vehicles to rail distribution ramps for subsequent delivery to our dealers. On average, Chrysler loads 750 multilevel railcars daily.

Most of the auto rack (multilevel) railcars in the Chrysler assigned fleet consist of a TTX pooled flatcar to which is mounted a railroad owned auto rack.

The Reload pool has for years relied on the investment by TTX in flatcars. TTX fosters the railroads' participation by supplying the underlying equipment and lifting the burden of investment in those cars from the railroads.

Chrysler understands that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority as we rely on the efficient functioning of the TTX flatcar pool for the growth and success of our business.

Sincerely,

A handwritten signature in black ink, appearing to read "S. J. Tripp".

Steven J. Tripp
Chrysler LLC
Senior Manager
Worldwide Vehicle Transportation

Exhibit 8

CLIFTON STEEL **STEEL COMPANY**

**16500 ROCKSIDE ROAD
MAPLE HEIGHTS, OHIO 44137
TELEPHONE 216-862-6111
FAX 216-862-6107**

January 22, 2014

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 Bruce W. Goodman, VP-Customer Service for Clifton Steel Co. I have been with Clifton Steel since 1985 and have been managing the railway products division for 28 years.

Clifton Steel is a manufacturer of abrasion resistant wear products provided to the rail industry for new & repaired freight car side frames and bolsters. Several of these products are sold to TTX including alloy steel wear plates & proprietary liners. These products are essential for the safe and reliable performance of the freight car fleet that TTX engineers and maintains so carefully.

We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's pooling authority because not only is TTX an important customer to us, but also because its successful growth is a benefit to the entire industry. Here are some ways by which TTX provides an ongoing benefit to Clifton Steel co as well as the rest of the industry:

Benefits from TTX investment in equipment:

TTX facilitates continuing investment by the U.S. railroad industry in intermodal equipment supply.

Over the last decade or more, TTX has played a very positive role in the railroad industry, fostering a significant expansion of intermodal traffic and contributing to the health of the car building industry.

CLIFTON STEEL COMPANY

**16500 ROCKSIDE ROAD
MAPLE HEIGHTS, OHIO 44137
TELEPHONE 216-662-6111
FAX 216-662-6107**

We do not believe that individual railroads alone could have sustained the same level of investment and growth in car supply without the capital TTX makes available and the efficiencies of operation that TTX achieves.

Benefits from TTX's research, design, and acquisition activities:

TTX has worked with car builders, parts suppliers, and shippers to develop new equipment types and improve the performance of existing cars in its fleet.

TTX chooses suppliers based on objective criteria embodied in its SECO program.

TTX's SECO program benefits the entire industry, not just TTX; it allows our company to offer buyers a measure of the quality we provide and helps us compete for orders.

TTX works closely with us to improve the design and reliability of our equipment.

TTX facilitates rapid adoption of new ideas and new technologies for improving equipment in the flatcar fleet.

TTX orders reflect an acknowledgement of quality that is an important selling point in our sales to other equipment buyers.

TTX's benefits in promoting the growth of rail intermodal traffic:

TTX promotes intermodal growth through all of its efforts to provide an efficient and adequate supply of high-quality flatcars

Over the past 30 years, TTX has played a critical role in promoting the growth of rail intermodal traffic. The continued expansion of rail intermodal traffic is critical to the growth of the car building and equipment supply industries.

The continued growth of intermodal transportation and success of TTX will help assure the continued growth of our company.

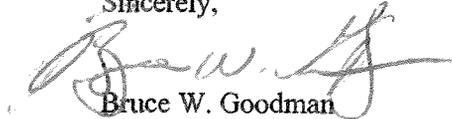
CLIFTON STEEL **STEEL COMPANY**

**16500 ROCKSIDE ROAD
MAPLE HEIGHTS, OHIO 44137
TELEPHONE 216-662-6111
FAX 216-662-6107**

TTX's efforts to promote intermodal growth have paid off and resulted in far higher sales than could have been achieved if railroads were left to their own devices.

We consider approval of TTX's application for a fifteen year extension of its pooling authority to be of critical importance to the continued growth of our business and the railroad industry as a whole.

Sincerely,



Bruce W. Goodman
Vice President-Clifton Steel Co.

Exhibit 9



COSCO Container Lines Americas, Inc.

235412

December 13, 2013

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

ENTERED
Office of Proceedings
January 16, 2014
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Public Record

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

Dear Ms. Brown:

I am writing to you in support of TTX's application for a 15-year extension of TTX's flatcar pooling authority.

I am the Vice President of Land Operations for COSCO Container Lines Americas, Inc. (COSCO), headquartered in Secaucus, NJ. COSCO is a global transportation carrier that is heavily involved in the movement of containers to and from North America. We handle a wide variety of consumer and industrial goods, primarily between overseas locations and points throughout North America.

Rail-oriented intermodal is integral to our business activities in North America. We serve every major market in the U.S. and Canada by rail from many different ports. COSCO owns or charters the vessels it operates, but contracts with the railroads for services in the U.S. Railcar supply is a critical service component, as we offer a scheduled product that requires a reliable flow in order to support production line and distribution demands.

We understand that TTX is applying with the STB to extend its flatcar pooling authorization for 15 years. As in 2004, COSCO strongly supports an extension of TTX's pooling authority. A reliable, efficient supply of railcars is essential for our customer's supply chains and the stability of the intermodal product.

The TTX railcar pool has provided stability due to TTX's ability to react to rapid market demand shifts through effective fleet management and capital investment. TTX's structure ensures that cars flow freely between the railroads, car quality is maintained, and sufficient capacity is available to support fluctuating demand. Without a shared railcar pool, costs would rise, impeding the continued growth of intermodal transportation. More cargo would shift to the highway, increasing the cost of consumer products we use every day.

COSCO Container Lines Americas, Inc. considers the approval of TTX's application to be of great importance to the continued growth of our business.

Sincerely,

Ann Marie Papaccio
Vice President – Land Operations

Exhibit 10



DART INTERMODAL, INC.

800 Lone Oak Road, Eagan, MN 55121 • P.O. Box 64110, St. Paul, MN 55164-0110 • Office: 651-688-2000 • 800-311-2209 • Fax: 651-683-1286

March 10, 2014

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 Steve Landberg, Vice President of Intermodal for Dart Transit Company in Eagan, Minnesota.

Dart Transit is a motor carrier with revenues of approximately 500 million dollars. We operate as an irregular route class 1 carrier with both contract and common carrier business.

I have been employed at Dart for 32 years in the operations area of both the trucking and intermodal departments.

We are somewhat unique with our incorporation of truck and intermodal, using 53' trailer equipment.

Our use of truck/rail is founded on the principle of flexibility and high customer service. We specialize in using our truck/rail service to move shipments from non-traditional intermodal markets. Our success is largely governed by expediting shipments several hundred miles by truck to meet high service trains.

This process allows shippers in more remote markets to enjoy the financial benefits of intermodal and still retain the service that trucking operations offer. Most of our equipment is high-cube 53-foot van trailers. However, we do operate a small fleet of 53-foot domestic containers. For us to provide the service our customers expect, it is essential that an adequate supply of flat cars and well cars are available at the rail terminals.

In our sixteen-year experience with this endeavor, we have very seldom experienced an occurrence of service delay due to flat car availability.

It is my understanding that the TTX model of pooled fleet management and their research and development activities have, to a large degree, allowed intermodal to develop and expand.

We have found that the fleet of pooled equipment has been well maintained and designed in such a way that minimizes damage and wear to our equipment and our customers' freight.

Ms. Cynthia T. Brown
Surface Transportation Board
March 10, 2014
Page 2 of 2

It is also our experience that TTX has kept pace with the growth and changing needs of intermodal over the years. Without TTX, we suspect the intermodal industry would suffer. Individual equipment operations would be less productive, more expensive, and fewer in number if each railroad were to invest in rail cars. It would seriously impact the flow of transcontinental shipments and I suspect also cause congestion within the rail terminals.

We support an extension of the pooling authority currently in place. The continued development of equipment, the financial strength to manufacture, and the operational maturity to productively manage the resource, support the requested extension.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Landberg". The signature is written in a cursive style with a large, stylized initial "S".

Steve Landberg
Vice President
Dart Intermodal, Inc.

Exhibit 11

January 15, 2014

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

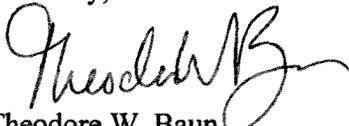
Dear Ms. Brown:

My name is Theodore W. Baun and I am Senior Vice President, Marketing and Sales for FreightCar America, Inc. I have worked in the rail industry for over twenty years and have held positions of increasing responsibility in both the railcar leasing and manufacturing segments of the industry. FreightCar has been a major manufacturer of railcar equipment for more than 100 years, with innovative product offerings tailored to the bulk commodity and containerized freight transportation needs of our customers. These railcar products include open top hoppers and gondolas along with intermodal and non-intermodal flat cars.

We understand that TTX is seeking reauthorization of its flat car pooling authority. As a manufacturer of intermodal equipment, FreightCar recognizes the key role that such pooling authority plays in support of efficient intermodal operations and investment in intermodal railcar equipment. In fact, in large part, TTX's flatcar pool authority provided the foundation upon which the U.S. rail intermodal franchise was built.

We support the reauthorization of the pooling authority granted to TTX given that the U.S. economy is well served by the ongoing expansion of intermodal transportation.

Sincerely,



Theodore W. Baun
Senior Vice President, Marketing and Sales

Two North Riverside Plaza
Suite 1300
Chicago, IL 60606 USA
312.928.0850
FAX 312.928.0890
www.freightcaramerica.com

Exhibit 12



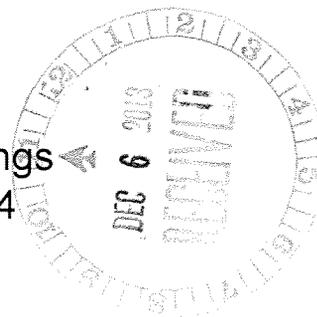
80 ROUTE 4 EAST, SUITE 490, PARAMUS, NJ 07652 • TEL. (201) 291-4600 • FAX. (201) 291-9393

235401

December 5, 2013

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

ENTERED
Office of Proceedings
January 16, 2014
Part of
Public Record



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

Dear Ms. Brown:

I am writing to you in support of TTX's application for a 15-year extension of TTX's flatcar pooling authority.

I am Senior Vice President for Hanjin Shipping America, LLC, headquartered in Paramus, New Jersey. Hanjin Shipping is a global transportation carrier that is heavily involved in the movement of containers to and from North America. We handle a wide variety of consumer and industrial goods, primarily between overseas locations and points throughout North America.

Rail-oriented intermodal is integral to our business activities in North America. Over 40% of our international container traffic moves via rail through the U.S. and Canada. We serve every major market in the U.S. and Canada by rail from many different ports. Hanjin Shipping owns or charters the vessels it operates, but contracts with the railroads for services in the U.S. Railcar supply is a critical service component, as we offer a scheduled product that requires a reliable flow in order to support production line and distribution demands.

We understand that TTX is applying with the STB to extend its flatcar pooling authorization for 15 years. As in 2004, Hanjin Shipping strongly supports an extension of TTX's pooling authority. A reliable, efficient supply of railcars is essential for our customer's supply chains and the stability of the intermodal product.

The TTX railcar pool has provided stability due to TTX's ability to react to rapid market demand shifts through effective fleet management and capital investment. TTX's structure ensures that cars flow freely between the railroads, car quality is maintained, and sufficient capacity is available to support fluctuating demand. Without a shared railcar pool, costs would rise, impeding the continued growth of intermodal transportation. More cargo would shift to the highway, increasing the cost of consumer products we use every day.

Hanjin Shipping considers the approval of TTX's application to be of great importance to the continued growth of our business.

Sincerely,

Mike Radak
Senior Vice President
Hanjin Shipping America, LLC.

Exhibit 13



January 14, 2014

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 Jordan Wolf and I am the President of Holland, LP, 1000 Holland Drive, Crete, IL 60417. Holland is a wholly owned subsidiary of Curran Group Inc. I have held the position of President of Holland since January 1, 2013, prior to that I had been the Chief Financial Officer of Curran Group since July, 2004.

Holland is a company dedicated to providing the highest quality railway supplies and services around the world. We supply services and equipment to assist railroads in maintaining their track structures. In addition, we design and supply unique rail car components. Specifically for TTX, we are a major supplier of load securement and cargo restraint systems.

We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority. TTX is an important customer of Holland and their successful growth is important to us.

Throughout the years, TTX has played a very positive role in the railroad industry, fostering a significant expansion of intermodal traffic and contributing to the health of the car building industry. We do not believe that individual railroads alone could have sustained the same level of investment and growth in car supply without the capital TTX makes available and the efficiencies of operation that TTX achieves.

TTX has worked with car builders, parts supplier and shippers to develop new equipment types and improve the performance of existing cars in its fleet. We know that they choose suppliers based on objective criteria embodied in its SECO program. They work closely with us to improve the design and reliability of our equipment. TTX orders reflect an acknowledgement of quality that is an important selling point in our sales to other equipment buyers.

TTX promotes intermodal growth through all of its efforts to provide an efficient and adequate supply of high-quality flatcars. Over the past 40 years, TTX has played a critical role in promoting the growth of rail intermodal traffic. The continued expansion of rail intermodal traffic is critical to the growth of the car building and equipment supply industries.

We consider approval of TTX's application to be of critical importance to the continued growth and success of our business and the railroad industry in total.

Sincerely,



Jordan Wolf
President

Exhibit 14



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

January 14, 2014

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

Dear Ms. Brown,

My name is J. Derek McLean. I am president and owner of J. Bard McLean, Inc. , a manufacturers representative organization in the rail industry. I have held this position for the past twenty years and have been in the rail industry almost thirty years.

J. Bard McLean represents numerous supply companies which produce products such as forgings, fabrications, services, etc. sold to TTX. We are a third generation family company that has done business with TTX over forty years, first starting when TTX originated in Philadelphia, Pa.

We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority, not only because TTX is an important and valued customer, but also because successful growth will benefit many with in the rail community.

I fully support the continued flatcar pooling for a number of reasons. TTX continued investment in intermodal equipment benefits J. Bard McLean, Inc. because of the parts we sell to TTX to put on their railcars. Over the last decade or more, TTX has played a very positive role in the rail industry, fostering a significant expansion of intermodal traffic which contributes to the health of the car building industry which has also had a positive effect on J. Bard McLean, Inc. I do not believe that the individual railroads alone could have sustained the same level of investment and growth in intermodal equipment without the capitol TTX makes available and the efficiencies of operation that TTX achieves.

TTX works with several companies that I represent in research and design to improve performance of new and existing cars in its fleet. TTX chooses suppliers

based on objective criteria, embodied in its SECO program. (SECO is a quality evaluation program) TTX's SECO program benefits the entire industry, not just TTX; it allows our company to offer buyers a measure of the quality we provide and helps us compete. TTX works closely with the companies I represent to improve the design and their reliability of our products. TTX facilitates adoption of new ideas and new technologies for improving equipment. Having TTX's SECO award and approval helps J. Bard McLean, Inc. sell to other railroad companies, which is critical to our success.

Over the past forty years, TTX has played a critical role in promoting the growth of rail intermodal traffic, which is critical to the growth of the railroads and equipment supply industries. The continued expansion of intermodal transportation and the continuation of the TTX flatcar pool will increase our company's ability to succeed.

In closing, I support TTX's application for extension of its pooling authority to ensure that TTX will continue to supply efficient and economical flatcar service in the years to come which will impact the growth and success of the rail industry.

If you would like to discuss this further, please feel free to contact me at my office. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Derek McLean', with a long horizontal flourish extending to the right.

J. Derek McLean
President, J. Bard. McLean Inc.

Exhibit 15



January 16, 2014

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

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

Dear Ms. Brown,

My name is Ric Chavez and I reside in Nashville, TN where I work for Louisiana-Pacific Corporation (LPCorp). LPCorp supports an extension of TTX's flatcar pooling authority. LPCorp is a major manufacturer of engineered forest products building products. Summarily, these are commonly known as Oriented Strand Board, I-joists, Laminated Veneer Lumber, Laminated Strand Lumber, and Siding. LP has manufacturing facilities in TX, AL, NC, ME, MI, WI, MN; as well as, the Canadian Provinces of Quebec, Manitoba, and British Columbia. We ship to all building products consumption areas involving all major domestic markets as well as most other markets serviced via rail; and given the bulk nature of our products and the distance involved, rail is the prime candidate to facilitate. LPCorp utilizes both boxcars and flatcars to fill our rail shipping needs. One of my primary roles, as LPCorp's Director of Corporate Logistics for the past ten years, has involved the shipment of our finished products.

It is our understanding that TTX is seeking reauthorization of its flatcar pool. I would like to make it clear that LPCorp does not rely solely on TTX for its flatcar needs and depending on the respective interaction with our Class I and other rail partners, that percentage will vary greatly. That said, the productivity and flexibility that the TTX flatcar fleet injects into the market is a significant difference maker. LPCorp originates traffic on all Class I railroads (except KCS) and uses service of all Class I roads, in addition to many of the rail industry's short lines. I believe this has given us a broad and solid understanding of the value that TTX has added to the market. An absence in the market of this pooled fleet would likely raise individual fleet risks, raise response time to address demand swings, and in turn, negatively impact cost which would ultimately places higher costs and service deficiencies on shippers and end use customers.

It is with this in mind that LPCorp would like to express support for TTX's reauthorization of the flatcar pool.

Thank you in advance for reviewing our position,

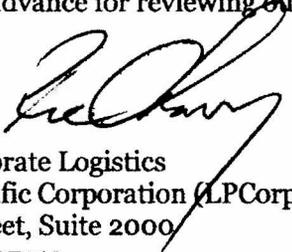

Ric Chavez
Director Corporate Logistics
Louisiana-Pacific Corporation (LPCorp)
414 Union Street, Suite 2000
Nashville, TN 37219

Exhibit 16



January 16, 2014

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 Joe Robledo, Vice President of Intermodal for Matson Logistics, responsible for rail intermodal services in North America. I've worked in the rail transportation industry for 29 years, the past twelve with Matson. While with Matson, I completed the University of Denver Intermodal Transportation Institute program (MS, 2007).

Matson Logistics utilizes the rail intermodal networks of US, Canadian, and Mexican rail carriers to facilitate the transport of both domestic (e.g. 53') and international (e.g. steamship 45'/40'/20') container and trailers. With thousands of shipments moving each month, Matson relies on the cost effective efficiencies of the TTX shared flatcar pool.

We understand that TTX has applied for an extension of its flatcar pooling authority. We strongly support reauthorization of TTX's flatcar pool, because it will strengthen the intermodal transportation system in which we participate.

Following are key benefits TTX provides Matson and the industry:

TTX takes the capital and ownership risk, they facilitate expansion of the intermodal fleet with new and modified equipment in response to market demands.

The TTX pool minimizes car supply problems for railroads pursuing traffic opportunities in competition with trucks or other railroads.

TTX pool cars move across the railroad network without restrictions.

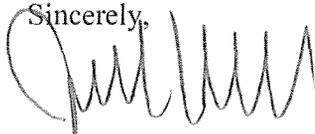
The size of TTX's fleet and its ability to move flatcars among rail carriers has allowed us to expand our business, relying on TTX's ability to provide a higher number of flatcars as needed.

Letter to Cynthia T. Brown
STB - TTX
1/16/14
Page 2

TTX places a high priority on forecasting economic and industry demands in order to manage investments and maintain an efficient and sufficient flatcar pool.

We consider approval of TTX's application to be of critical importance to the continued growth and success of our business.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joe Robledo', with a large, stylized initial 'J'.

Joe Robledo
VP Intermodal

Exhibit 17



GREGORY J. AZIZ
CHAIRMAN & CEO

NATIONAL STEEL CAR LIMITED
P.O. BOX 2450
HAMILTON, ONTARIO
L8N 3J4

(905) 544-3311
FAX: (905) 544-8872

235833
ENTERED
Office of Proceedings
April 8, 2014
Part of
Public Record



April 3, 2014

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

RE: Finance Docket No. 27590 (Sub-No. 4)
TTX Company – Application for Reauthorisation of TTX Flatcar Pool

Dear Ms. Brown,

We are writing to you concerning the above captioned matter, which we understand is currently under review by the Board. Please give consideration to the contents of this document during your review process.

National Steel Car is a railroad freight car manufacturing company that has provided TTX with many of the railcars it utilizes in its railcar pool. National has provided TTX with the following car types:

- i. articulated all-purpose double stack well cars, which carry ocean and domestic containers as well as highway trailers;
- ii. articulated double stack well cars, which carry ocean and domestic containers;
- iii. stand alone well cars, drawbar connected or coupled, which carry ocean and domestic containers;
- iv. articulated spine cars which carry ocean and domestic containers, as well as domestic highway trailers; and
- v. 89' flat cars which carry highway trailers and are also outfitted with auto-racks for the domestic delivery of new finished automobiles. These cars are also used for the transportation of specialty goods such as pipe and heavy steel sheet and plate.

National Steel Car supports TTX's Application for three reasons, set forth below:

- Productivity of the fleet,
- Financial benefit to America's railroads; and
- The U.S. national interest.

Productivity

Pooling railroad freight equipment provides the opportunity to obtain high productivity, compared to equipment that is not pooled. Because the equipment can be loaded and moved in any direction, the unproductive empty movement of cars is reduced saving the railroads substantial operating costs. The efficiency of the pool allows TTX to provide flat cars at reduced rates, as TTX can pass on the results of its higher productivity, allowing the railroads to market them more effectively and grow intermodal service for the benefit of the shipping public. In our view, the presence of the TTX flatcar pool has been a key contributor to the success and growth of intermodal.

Financial Benefit to America's Railroads

The American railroad industry is among the most highly capital-intensive in the country. Large carriers are responsible for thousands of miles of track, bridges, trestles, tunnels, road crossings, terminals and equipment. With these demands, it is clear that the industry could not fund all of its demands for equipment, especially in high growth markets like intermodal and finished vehicle transport. By shouldering the capital burden of the railcars that support these markets, TTX allows the railroads to continue to expand these markets, while not having to extend the capital investment within their own industrial organisations, fostering growth system-wide. This is to the benefit of companies like ours and, more important, to the benefit of the shipping public which enjoys the access to a supply of needed equipment that might not be as large without TTX's participation.

U.S. National Interest

TTX deploys substantial resources to analyze the need for new equipment on a system-wide basis to be sure that it has adequate equipment to meet the needs of all of its owners. While no railroad is prevented from supplying its own fleet, the presence of TTX means that there will be a ready supply of cars that is adequate to the needs of the member carriers based on predicted growth. It also has enhanced competition because the railroads have been able to establish marginal services and grow them without having to invest the capital in new equipment, since TTX has done that.

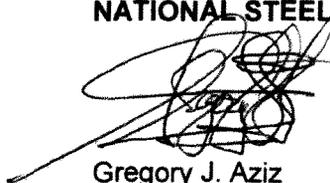
Moreover, TTX's cars have been increasingly standardised to improve efficiency. This has served to foster a mature and stable market in which the participants – the car builders, steamship lines, trucking companies and railroads – have been able to achieve enormous efficiencies. The resulting system has been a great benefit to the shipping public and to the economy generally. And, the more goods travel by rail, the fewer trucks and trailers travel the Nation's highways, saving in highway repair costs.

Conclusion

Although this submission provides only a brief overview of the activities and benefits of the TTX pool, in our view there is only one conclusion that, upon reflection, the Board can reach. As a model both in theory and in practice, the TTX railroad car equipment pool is unique in its efficiency and productivity. National Steel Car supports, most vigorously, the immediate re-authorisation of the TTX Company flatcar pool as submitted in its Application.

Very truly yours,

NATIONAL STEEL CAR LIMITED

A handwritten signature in black ink, appearing to read 'Gregory J. Aziz', is written over a circular stamp or logo. The signature is somewhat stylized and overlaps the stamp.

Gregory J. Aziz
Chairman & CEO

Exhibit 18

January 14, 2014

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 J. Hawthorne, President of New York Air Brake, LLC headquartered in Watertown, NY. We are a wholly owned company of Knorr Bremse based in Munich Germany. NYAB is responsible for AAR (Association of American Railways) heavy haul product application, and I am responsible for all NYAB operations. I've been in the position of President for almost two years and with the company for almost 20 years.

NYAB is focused on providing control systems for and services related to freight train operation. Our products range from mechanical devices that control and actuate brakes to train subsystems such as compressors and air dryers to software designed to improve overall railroad operations. Our services business works to repair and overhaul braking systems.

Our mission is to serve the rail industry with a strong focus on performance, reliability and value. We make the braking systems that stop the train; our product must perform. Our customers, including TTX, count on us to provide products, services, and support to ensure safe and efficient operations. We see the rail industry in general and TTX operations in particular, as vital to our economy, offering the most economical means of transportation available.

TTX is a critical customer of NYAB. We proudly serve their fleet to ensure high availability of cars to the member railroads. Providing product to TTX's flatcar fleet has been a major source of business for NYAB in the recent past and we have worked extraordinarily hard to ensure that fleet met the growing demands of the industry.

NYAB understands that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority because we see the service TTX provides as vital to the industry we serve. We rely on the continued operation and investment by TTX to ensure the health of our business.

As a supplier of products to car builders, NYAB's business relies on fleet operator's investment to create demand. TTX has been a stabilizing force in our market, especially during the downturns in car demand. TTX's investment in flatcars is a prime example of their willingness and ability to keep our market stable while serving a vital economic need in our country. The TTX model is uniquely suited to manage risk and capital for the railroad industry, ensuring the fleet is appropriately sized for demand.

TTX represents a model of efficiency with both their supply of pooled cars and their approach to maintenance. NYAB has been awarded the TTX SECO Excellent Supplier Award 13 years of which 5 have been consecutive awards. We embrace the standards set by TTX and are pleased to be recognized as a part of the supply chain that serves the railroads so effectively. Through highly focused and proactive maintenance, TTX continues to ensure a reliable supply of cars.

NYAB also finds TTX as a ready and willing partner to support research and design of products to further the quality and performance of our products and the freight car on which they are installed. As our industry evolves, the demands for all elements of freight car performance are evolving as well. TTX does a great service to the industry by supporting our efforts to continually improve and innovate our products.

It is clear that intermodal traffic is a major growth engine for the railroads and therefore for NYAB. TTX supports and promotes this growth through their operation of the largest intermodal fleet in the industry. The collective success of the industry and suppliers that serve it will be heavily dependent on TTX and their supply of the flatcar pool. NYAB finds comfort in that dependence as TTX has proven to be a most capable operator.

In closing, TTX has been a model of efficiency in supplying cars to the rail industry. Without TTX, the past growth and expected future growth of intermodal traffic would be considerably less. We consider approval of TTX's application to be of critical importance to the continued growth and success of our business.

Sincerely,



Michael J. Hawthorne
President

Exhibit 19



NYK LINE (NORTH AMERICA) INC.

CORPORATE HEADQUARTERS
300 LIGHTING WAY, 5TH FLOOR
SECAUCUS, NJ 07094
TELEPHONE: (201) 330-3000
FAX: (201) 867-9059; (201) 864-9180

February 12, 2014

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 Vice President of Operating Services for NYK Line (North America) the wholly owned unit of Nippon Yusen Kaisha of Tokyo, Japan. I am responsible for over \$275 million in annual rail intermodal expenditures as well as the safe, responsible and fluid movement of these assets.

I am a graduate of US Merchant Marine Academy and have numerous vessel and intermodal specific certifications. I have been engaged in the maritime industry for more than 20 years.

The purpose of this letter is to clearly support TTX Company's application before the Surface Transportation Board (STB) for reauthorization of its flat car pooling authority, which expires on October 1, 2014.

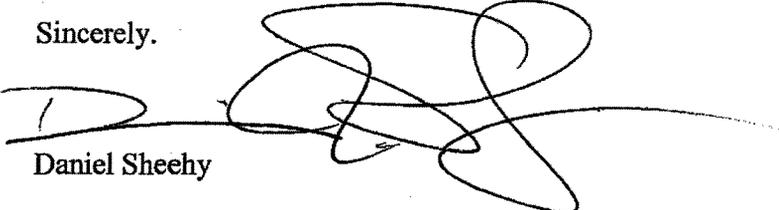
My company's utilization of the services of TTX supports over 250,000 individual ocean container units per year of international cargo between seaports and inland destinations. This cargo moves during the year in cyclical "peak seasons" to support American buying patterns, which could not be met without the TTX pooling agreement. This is a model that ocean carriers have reviewed with respect to managing our own assets such as containers and chassis' to improve efficiency and fluidity in the U.S. transportation system.

TTX facilitates continuing investment in rail intermodal equipment, adheres to the strictest maintenance standards, removes unfit rolling stock, undertakes extensive market and

infrastructure research, and conducts its pooling with clear and disciplined business rules without which there would be chaos.

We are a strong supporter of the application of TTX Company's extension for the reasons articulated above and would be happy to answer any questions your office may pose of NYK Line (North America)

Sincerely,



Daniel Sheehy

Vice President, Operating Services

NYK Line (North America)

Exhibit 20



PORT OF OAKLAND

January 8, 2014

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 Jean Banker and I am Acting Maritime Director at the Port of Oakland. I have worked at the port for the past seven years, but have held positions in the industry for more than 20 years.

The Port of Oakland loads and discharges more than 99% of the containerized goods moving through Northern California, the nation's fourth largest metropolitan area. Oakland's cargo volume makes it the fifth busiest container port in the United States. Five container terminals and two intermodal rail facilities serve the Oakland waterfront. The Union Pacific and BNSF railroad facilities are located adjacent to the heart of the marine terminal area to provide a reliable and efficient movement of cargo between the marine terminals or transload facilities and the intermodal rail facilities.

We understand that the TTX Company (TTX) is seeking reauthorization of its flatcar pool. The Port of Oakland strongly supports an extension of TTX's flatcar pooling authority because we rely on the smooth functioning of the TTX flatcar pool for the continued success of our business.

It is essential that intermodal railcars can move across the railroad network without restrictions in order for our ocean carrier-partners to efficiently service their accounts. TTX's intermodal pool meets this need. Moreover, it would be doubtful that we could handle our current rail volume without a fungible asset like the TTX intermodal car, since railcar storage and sorting capability are limited. A well-maintained and free-flowing railcar fleet is an asset that contributes to the national economy by lowering the cost of delivered goods.

In conclusion, the Port of Oakland strongly supports TTX's application for a 15-year extension of its pooling authority. It is vital to our port and the national transportation network.

Sincerely,

Jean Banker
Acting Maritime Director

Exhibit 21



January 23, 2014

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 Joseph P. Ruddy. I am the Chief Operating Officer for Virginia International Terminals, LLC (VIT) based in Norfolk, VA. I have been involved with intermodal transportation for over 25 years.

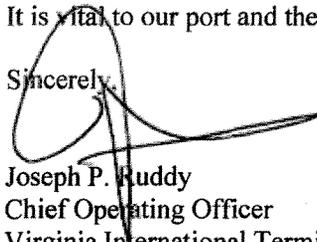
VIT is responsible for the operations of four large marine terminals in the Port of Hampton Roads, in addition to an inland port in Front Royal, VA. Our combined terminals handled over 2.2 million TEUs in 2013, 34% of which are moved by rail. We handle a wide variety of cargoes and offer the deepest channels on the U.S. East Coast, capable of handling post-Panamax class 10,000+ TEU vessels. The rail movement of containers is vital to our strategy for growth. We work closely with Norfolk Southern and CSX to accomplish seamless transportation service to our mutual customers, the shippers and consignees of international trade.

We understand that TTX is seeking reauthorization of its flatcar pool. VIT strongly supports an extension of TTX's flatcar pooling authority because we rely on the smooth functioning of the TTX flatcar pool for the continued success of our business.

It is essential that intermodal railcars can move across the railroad network without restrictions in order for our ocean carrier-partners to efficiently service their accounts. TTX's intermodal pool meets this need. Moreover, it would be doubtful that we could handle our current rail volume without a fungible asset like the TTX intermodal car, since railcar storage and sorting capability are limited. A well-maintained and free-flowing railcar fleet is an asset that contributes to the national economy by lowering the cost of delivered goods.

In conclusion, VIT strongly supports TTX's application for a 15-year extension of its pooling authority. It is vital to our port and the national transportation network.

Sincerely,



Joseph P. Ruddy
Chief Operating Officer
Virginia International Terminals, LLC

P. O. BOX 1387 • NORFOLK, VA 23501-1387 • (757) 440-7000

Exhibit 22



805 Golf Lane, Bensenville, Illinois 60106
Phone: (630) 595-4560 FAX: (630) 595-0646

January 13, 2014

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 Marc Trani and I am the President of Railway Supply Group. Based in Bensenville, IL, We are a family of companies proud to have served the rail industry for over 50 years. I have spent over 20 years in the rail supply business working in the areas of manufacturing, sales and administration. I assumed my current role in 2013 and prior to that held an upper management sales position for another rail products supplier, the Holland Company.

We are proud to be a leading provider of key freight car components serving railroads, new car builders and repair shops throughout North America and around the World.

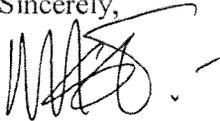
Additionally, we are extremely gratified for the time-honored relationships that we've built with all of our customers. At Railway Supply Group, we are able to work closely with equipment providers like TTX to offer a combination of traditional and innovative freight car products to assist them in the maintenance and growth of our nation's freight transportation.

We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority, because we rely on the smooth functioning of their flatcar pool for the growth and success of our business.

TTX has always demonstrated a commitment to provide a fleet of high-quality, well-maintained railcars, thereby providing component demands in years when car builds may be minimal. Their SECO process provides us with an opportunity to evaluate our product performance and ensure the bar is set to providing the highest quality products. TTX has continually demonstrated a commitment to improve the quality of their fleet and have worked with us and other suppliers to provide improved products to meet the industry's evolving needs.

Supporting TTX's efforts in increasing the availability of freight transportation equipment is aligned with our goals of ensuring that the freight rail infrastructure in the United States continues to set the benchmark for optimal rail transportation. We consider approval of TTX's application to be of critical importance to the continued growth and success of our business and our industry.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Trani', with a horizontal line extending to the right from the end of the signature.

Marc S. Trani
President
Railway Supply Group

Exhibit 23



1700 NORTH MOORE STREET
SUITE 2250
ARLINGTON, VA 22209
T (703) 841-2300 F (703) 841-1184
WWW.RILA.ORG

March 7, 2014

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 writing to express the Retail Industry Leaders Association's (RILA) support for TTX's application for the Surface Transportation Board (STB)'s reauthorization of its flatcar pool. With these pooled, multi-purpose railcars available for widespread domestic use, railroad fleet distribution becomes more simplified, transportation costs are further minimized, and thus overall efficiency increases within the entire U.S. supply chain.

By way of background, RILA is the trade association of the world's largest and most innovative retail companies. RILA members include more than 200 retailers, product manufacturers, and service suppliers, which together account for more than \$1.5 trillion in annual sales, millions of American jobs and more than 100,000 stores, manufacturing facilities and distribution centers domestically and abroad.

Retailers face supply chain challenges today as infrastructure deficiencies lead to bottlenecks and congestion, creating an increase in costs for everyone throughout the supply chain. As such, retailers across the United States support any means that can be taken to reduce these inefficiencies and decrease transportation costs.

TTX's ability to achieve operational and maintenance savings throughout the entire transportation process creates lower car costs. These lower costs can then be passed along to the shipper community, thus encouraging further growth of intermodal traffic and its future expansion that is critical to a healthy, productive economy.

The TTX reauthorization would establish a tangible process for freight planning that would strategically invest in the nation's transportation system by providing capital avoidance and decreasing other operational costs for railroads. This will enhance the efficiency of goods

movement internationally and domestically, by alleviating freight congestion and increasing productivity. Further developing the inter-modality of modern supply chains will ensure the vitality of U.S. infrastructure and overall growth of the nation's economy.

In conclusion, RILA supports TTX's application for a fifteen-year extension of its pooling authority to ensure that TTX will continue to supply efficient and economical flatcar service in the years to come. We appreciate this opportunity to express our support for this proposal. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelly D. Kolb". The signature is fluid and cursive, with the first name "Kelly" being more prominent and the last name "Kolb" following in a similar style.

Kelly D. Kolb
Vice President, Government Affairs
Retail Industry Leaders Association

Exhibit 24



Donald G. Regan
President and
Chief Executive Officer

1440 St. Catherine St. West
Suite 712
Montreal, Quebec
Canada H3G 1R8

Tel.: (514) 866-1033
Fax: (514) 866-8421

January 14, 2014

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'm writing you today in full support of TTX's application to the Surface Transportation Board for reauthorization of the TTX flatcar pool. I am Chairman and President of Ronsco Inc. I worked for CN after university in various positions in Research & Development, Equipment Planning and Freight Marketing. I joined Ronsco in 1972 and as a result have had the unique perspectives of a railroader, customer and supplier. Our company has been a significant supplier to the railway and transit industries for over 40 years.

Ronsco provides a large array of products and services to the railway industry.

- Products include axles, wheels, steel flooring, tank car valves, hatch cover locks, brake beams and 30 other product groups
- Ronsco distributes all its products out of strategically located warehouse facilities in Calgary (Alberta) Oakville (Ontario) and Coteau du Lac (Quebec)
- Ronsco and its subsidiary AllRail supply a network of mobile repair services to provide turnkey solutions for light locomotive and railcar servicing
- Ronsco provides general freight and tank car heavy repair and recertification services at locations in Montreal, Quebec and Shoals, Alabama.
- Ronsco through its subsidiaries AllRail and AllTrain provides consulting and training related development and delivery services in North America and around the world

TTX flatcar pooling benefits our company by taking the ownership risk away from any single railroad, enabling the rail industry to actively develop the domestic 53' container market.

This in turn has led to the continual growth of intermodal transportation and demand for our company's componentry and services.

TTX's insistence on the need for the highest quality products for its 200,000 car lease fleet has led to an enviable safety record. TTX's supplier excellence audit process "SECO" ensures that only the highest quality products are utilized to both build and maintain their fleet.

I've had the privilege of being a founding member and first President of the Canadian Association of Railway Suppliers (CARS). I've witnessed the "rail renaissance" starting with the Staggers Act of 1980 that deregulated the North American railroad industry allowing it to compete. Railroads in North America are healthier, safer and more competitive than ever before. TTX through its flatcar pooling agreement and Form-A-contract has been an integral part of that success. It is essential for our industry that this arrangement continues and the 15 year extension be granted.

Thank you.

A handwritten signature in black ink, appearing to read "R. J. Beaman", with a horizontal line underneath it.

Exhibit 25



January 24, 2014

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 Bruce Byrd, and I am the Director of Transportation for SSAB Americas. I have over 30 years of logistics experience with the last 14 being with SSAB Americas, all working closely with the rail industry.

SSAB Americas is a producer of steel plate and coil operating two mills along with three cut to length lines. Worldwide, SSAB employees over 17,000 people with over 1,800 in the US operations. The main mills are located in Axis, Alabama and Montpelier, Iowa. Our mills produce 2.6 million tons of steel annually. Our other lines are located in Houston, TX, St Paul, MN and Toronto, ON. We ship worldwide, but primarily in the US, Canada and Mexico. SSAB relies on rail, trucks, barges, containers and ships for the transport of our material.

In 2013 we shipped over 15,000 rail loads of which over 12,000 of these loads were on flatcars, many from the TTX fleet. These loads go all over the US, Canada and Mexico.

SSAB understands that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority. They are a vital supply chain link in our business and we heavily rely on their functioning and managing of the TTX flatcar pool for the growth and success of our business.

Without TTX's support to the other Class 1 Railroads, SSAB as a shipper would not be able to cost effectively move our product. If we did not have them, we would be forced to move more shipments over to trucks. On top of not being economically viable, SSAB as an environmentally and safety conscious company who would not want to see an additional 30,000 more truckloads yearly put onto the highways....that's if we were to just convert half our rail loads to truck. That's in addition to the 58,000 truckloads we currently ship. Rail is an imperative link in our supply chain.

TTX facilitates continuing investment by the U.S. railroad industry in flatcar equipment supply. Although most of the flatcars we use are not owned by TTX, TTX is an important source of investment by the U.S. railroad industry in flatcars that can carry SSAB's products.

SSAB Alabama Inc.

12400 Highway 43 North
Axis, AL 36505

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F +1 251 662 4360

Toll-free +1 888 592 7070
www.ssab.com



TTX's investment in a shared fleet of 60' and 89' flatcars provides a critical resource ensuring that car supply issues do not prevent us from shipping our products. 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.

SSAB has benefited from TTX's ability to redeploy its flatcars for loading by any railroad anywhere in the continent; this flexibility makes cars less risky to own and helps ensure that cars are available when new shipping needs emerge. TTX provides high-quality, well-maintained flatcars and maintains them efficiently. TTX has also demonstrated its commitment to provide a fleet of high-quality, well-maintained flatcars.

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. By maintaining its cars to achieve a high degree of reliability, TTX contributes substantially to the efficiencies and safety of railroad transportation.

TTX has worked with car builders, parts suppliers, and shippers to develop new equipment types and improve the performance of existing flatcars in its fleet. TTX is a proven innovator in flatcar design, with extra incentives to take advantage of the flexibility and efficiencies of its network-wide scope; TTX introduced the new XTTX flatcar, which can be easily adapted to carry various types of specialized loads without requiring significant alterations.

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, SSAB supports TTX's application for a fifteen-year extension of its pooling authority to ensure that TTX will continue to supply efficient and economical flatcar service in the years to come. We consider their relationship to the railroads to be of critical importance to the continued growth and success of SSAB Americas.

Sincerely,

Bruce Byrd
Director of Transportation
SSAB Americas
12400 Highway 43 N
Axis, AL. 36505
bruce.byrd@ssab.com
251-662-4470

SSAB Alabama Inc.

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Axis, AL 36505

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Toll-free +1 888 592 7070
www.ssab.com

Exhibit 26

STANRAIL

a division of the ROLL FORM GROUP of 

1225 Martin Luther King Dr. • Gary, Indiana 46402-3013
Gary 219/932-5200 • Fax 219/844-8512

January 10, 2014

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 Nancy Beckley, GM/Controller, of Stanrail, a division of Roll Form Group of Samuel. I oversee Stanrail on the day to day operations as well as prepare monthly financial statements and provide financial direction for the company. Prior to joining the Stanrail team eight years ago, I spent five years at Danaher Corporation at a manufacturing division in Chicago and was responsible for their financial department as VP - Finance. I also spent 18 years in the steel industry in a financial capacity.

Stanrail, a division of Roll Form Group of Samuel, is a leading supplier of Doors, Roofs, Nailable Steel Flooring, Seamless Steel Flooring, and Uncoupling Levers for Box Cars. A leading supplier of Side Sheets, Logo Boards, Anti-Theft Panels, and Roofs for Autorack Cars. We also provide a large quantity of Nailable Steel Flooring for many types of Flat Cars, Fabricated Ends for many types of cars, and Uncoupling Levers for every car on the rails. TTX is, by far, our largest customer and Stanrail products are on every type of car in the Pool.

Stanrail is highly dependent on the railroad industry as the products described above represent our core competencies and 95% of our revenue base. In addition, the City of Gary is highly dependent on our facility to employ citizens of Gary and support the local community.

We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority as TTX is an important customer and its successful growth will benefit us.

TTX facilitates continuing investment in intermodal equipment supply and other types of equipment which Stanrail heavily relies upon for shipping and receiving products. TTX continues to drive lower costs benefiting the entire economy.

STANRAIL

a division of the ROLL FORM GROUP of 

TTX is known for working closely with their suppliers, especially Stanrail, to improve the design and reliability of their equipment. Furthermore, TTX drives continuous improvement of suppliers through their SECO program.

All of TTX's actions make a positive impact on our company and the supply industry in general. We support TTX's application for a fifteen-year extension of its pooling authority to ensure that TTX will continue to supply efficient and economical flatcar service in the years to come, and this application approval is critical in the continuous growth and success of Stanrail.

Sincerely,



Nancy Beckley
GM/Controller

Exhibit 27



January 14, 2014

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 Mike Foxx. I am the owner of Strato Inc. and have been the Chief Executive Officer and President of the company for the past 30 years. I am the Chairman of the Railway Supply Institute, an active committee participant of the Association of American Railroads and the American Railway Car Institute. Our Vice President and Director of Engineering are also both strategically involved in key industry associations such as ASME, Air Brake Association and the American Foundry Society that support the rail industry.

At Strato, we specialize in the design and manufacture of products for the airbrake and draft systems as well as truck and car body structural components for locomotives, freight and passenger cars. Our customers include all North American original equipment manufacturers, Class 1 Railroads, transit rail systems, railroad repair facilities, and owners and lessors of rail equipment including TTX Company.

The products that we provide to companies including TTX consist of air brake hose assemblies, castings that connect piping for the purpose of conveying air within the air brake system, structural castings and fabrications that assure that the flow of air is properly distributed throughout the train without disruption and test apparatus to assure that airflow falls within the standards set forth by the rail industry.

We understand that TTX is seeking reauthorization of its flatcar pool of railcars. We fully support their request and urge that they be granted reauthorization. TTX, in our opinion, has been a leader in our industry in providing safe, reliable service for the transport of all types of products for our country and has benefitted all facets of American manufacturing in assisting them in supplying our consumers with consumable and durable goods in a timely manner. In addition, their pool of flatcars provides an extremely cost effective and fuel efficient means of transporting containerized products without causing wear and tear of our state and federal highway system. Granting them reauthorization assures the American consumer will continue to benefit from their expertise and keep TTX a major link in our transportation system. Needless to say, TTX's expertise and success is also a key contributor to the positive growth of our company as well.

Our company benefits from TTX's operation and growth of their flatcar pool in the following ways:

- The expansion of their fleet has invested billions of dollars in the building of new intermodal cars. At the same time, significant investment has been made in the maintenance of the 200,000 or so in their existing fleet of pool railcars. These expenditures have obviously had a drop down effect with suppliers such as us for products and engineering services leading to expansion and growth of our own company.
- We have been fortunate to expand our breadth of product offerings to meet TTX's needs and provide product life cycle value to assist TTX in maintaining a competitive posture in transportation costs.
- We do not believe that individual railroads alone could have sustained the same level of investment and growth in cars and ultimately a means of transportation of goods without the capital TTX makes available and the efficiencies of operation that TTX achieves.

Although TTX's major function is to supply railcars to transport products, benefits from TTX's research, design, and acquisition activities include:

- Working with its suppliers and customers to develop new equipment types that will provide greater efficiencies in transporting products.
- Its SECO program provides suppliers such as us with incentive to develop new products that will improve performance and reduce TTX's operating costs. TTX chooses suppliers based on objective criteria embodied in its SECO program.
- TTX's SECO program benefits the entire industry, not just TTX. It allows our company to offer buyers a measure of the quality we provide and helps us compete for orders.
- TTX, more than any of our other customers, works closely with us to improve the design and reliability of our products, facilitates rapid adoption of new ideas and new technologies for improving equipment in the flatcar fleet, and our orders from them reflect an acknowledgement of quality that is an important selling point in our sales to other equipment makes and buyers.

TTX promotes intermodal growth through all of its efforts to provide an efficient and adequate supply of high-quality flatcars.

- In our opinion, TTX's role is critical in providing rail intermodal traffic. The expansion of rail intermodal traffic is critical to the growth of our nation's economy as well as the car building and equipment supply industries.
- Our company's growth in both sales and technology advances can be attributed to our involvement in the relationship and intermodal transportation success of TTX. We believe that TTX pool efforts have promoted intermodal growth far beyond what could have been achieved if railroads had pursued these opportunities individually.
- Some might ask if TTX supplies too large a share of short-term intermodal car pool leasing and precludes individual railroads from participating in this business. It is our opinion that TTX saved

the railroads a considerable amount of money on capital equipment purchases and maintenance by providing this service. If the railroads were to purchase intermodal platforms for short-term needs, they would be expending capital funds for equipment that would not be used to capacity and present an undue financial burden on the railroads. For those routes that are in dedicated service, it would be advantageous for a railroad to purchase their own equipment and utilize it efficiently without the need of a pool service from TTX. Unfortunately, these cases are limited in intermodal service and the use and ultimately the need of TTX's pool service is virtually necessary. If it were not for TTX, we feel that there would be a shortage of intermodal equipment particularly at this time when container hauling capacity is limited.

In closing, Strato, Inc. supports TTX's application for a fifteen-year extension of its pooling authority. We feel that your approval of their application will ensure that TTX will continue to supply efficient and economical flatcar service for the growing North American intermodal business and contribute to Strato's success for years to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. J. Foxx', written in a cursive style.

Michael J. Foxx
President/CEO
Strato, Inc.

Exhibit 28



SUBARU.

Subaru of America, Inc.

Subaru Plaza
P.O. Box 6000
Cherry Hill, NJ 08034-6000
856.488.8581

235402

November 27, 2014

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

ENTERED
Office of Proceedings
January 16, 2014
Part of
Public Record

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

Dear Ms. Brown:

My name is Larry Strug; I am the National Transportation Manager for Subaru of America. I have been in this position for over 13 years. Prior to working at Subaru, my past experience was as the Director of International Automotive Marketing for Conrail and previous to Conrail I worked in Logistics for Volkswagen of America and prior to that I worked for Nu-Car Carriers in the trucking industry. Overall I have over 37 years experience in the automotive logistics industry. Additionally I earned a Bachelor of Science Degree in Business Logistics from the Pennsylvania State University.

Subaru of America, markets and distributes Subaru automobiles and parts to a network of over 600 retailers throughout the United States. Our automobiles are manufactured both in the United States and imported from Japan. Our distribution from our U.S. manufacturing is reliant on rail transportation for over 60% of our volumes and over 50% for our imported vehicles. Additionally we utilize rail for the importation of our parts and accessories via intermodal service. Rail provides a predictable, efficient, reliable means to move our products.

TTX provides a vital information link for the supply of empty multi-levels for both our U.S. manufacturing plant and our port facilities. We depend upon TTX and their management skills to support our supply-chain. We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority, because we rely on the smooth functioning of the TTX flatcar pool for the growth and success of our continued business.

Sincerely,

Larry Strug
National Transportation Manager
Subaru of America

Exhibit 29

 **Sumitomo Corporation of America**

January 14, 2014

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

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

Dear Ms. Brown,

I am a Senior Vice President and General Manager at Sumitomo Corporation of America, which is headquartered in New York City and supplies forged railroad wheels and axles to the major railroads, railcar builders, and maintenance companies in North America. Our products are held in a high regard by our customers throughout the industry for their high quality, which allows for the safe and efficient operation of fleets like TTX's, for example.

It has been brought to our attention that TTX aims to renew their reauthorization of its flatcar pool. We favor and support an extension of their authority, especially given the crucial role that they play in our industry. Their equipment management is central to consistently meeting the needs of railroads. Ultimately, it allows for a steady flow of goods and commodities, which benefits the economy.

As intermodal traffic increases, TTX's expertise to ensure that supply is balanced with demand will be a cornerstone of the railroads' success. Moreover, their activities will support the downstream sectors of the industry such as railcar building and related suppliers. Naturally, that will aid in the growth and solidification of our company and our workforce throughout the United States. However, keeping with the spirit of capitalism, we believe that TTX's role does not inhibit other options like leasing, etc. from being utilized by railroads should those in certain cases prove to be more favorable.

I would like to reiterate our support for TTX's application for a fifteen year extension of its railcar pooling authority. It will continue the efficiencies that TTX has brought to the industry, its customers, and its suppliers for the foreseeable future.

Sincerely,


Kenji Iijima

Senior Vice President and General Manager

Exhibit 30



THE
NATIONAL
INDUSTRIAL
TRANSPORTATION
LEAGUE

April 17, 2014

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

235925
ENTERED
Office of Proceedings
April 17, 2014
Part of
Public Record

RE: Finance Docket No. 27590 (Sub-No. 4) TTX Company—Application for Approval of Pooling of Car Service With Respect to Flatcars

Dear Ms. Brown:

The National Industrial Transportation League (NITL or League) is pleased to submit these comments in STB Finance Docket 27590 (Sub-No.4) regarding the application of the TTX Company for reauthorization of their flatcar pool. The League supports the Board's approval of TTX's application, without changes or conditions.

The League is one of the oldest and largest national associations representing companies engaged in the transportation of goods in both domestic and international commerce. The League was founded in 1907 and currently has over 500 company members. These members range from some of the largest users of the nation's and the world's transportation systems, to smaller companies engaged in the shipment and receipt of goods. The majority of the League's members include shippers and receivers of goods; however, third party intermediaries, logistics companies, and other entities engaged in the transportation of goods are also members of the League. Many members of the League are engaged in transportation of goods via rail subject to the jurisdiction of the Board and therefore have a strong interest in the matter that is the subject of this docket. In particular, League members use flatcars supplied by TTX.

The League very much agrees with the legal approach that the STB has taken in evaluating pooling agreements in the past, including prior applications of TTX for extended pooling authority. In the Board's evaluation of the subject application, we believe that same analysis should again be undertaken. As a general rule, and as the Board knows well, the League strongly favors competition in the provision of transportation services generally and rail services in particular. The League believes that antitrust immunity should be granted only where a clear public benefit is manifestly demonstrated; where the benefit of antitrust immunity clearly outweighs the anticompetitive effects of granting such immunity; and the proposal is narrowly drawn to achieve those benefits.

The fact that the Board has previously approved this pooling agreement does not mean that the standards for review and approval should be relaxed. The Board should examine this request for renewed approval in light of the status of competition and the needs of the public as they exist today. Likewise, if the competitive landscape changes in the future the Board should consider whether this agreement, if approved, merits a thorough review.

Our review of the TTX application was based on these demanding principles and high standards. The TTX pool manifestly benefits the nation's rail system, including both carriers and users of that system.

The League observes that TTX manages its fleet to minimize nonproductive empty miles and maximize loads. The result of these efficiencies is significant cost savings for railroads and potentially in turn to their customers. Coordinated maintenance and repair of the pool flatcars, improved asset utilization, synchronous car deployment throughout the rail network and TTX's own substantial investment in flatcars all indicate

there are significant public benefits from TTX operation and management of this pool. Moreover, the TTX pooling agreement does not unreasonably restrain competition.

Accordingly, the League believes and recommends that the subject TTX application should be approved by the Board, without changes or further conditions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bruce J. Carlton". The signature is fluid and cursive, with the first name "Bruce" being the most prominent.

Bruce J. Carlton
President and CEO
The National Industrial Transportation League

Exhibit 31

Trinity Equipment Co.

January 16, 2014

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 Keith Massey, President of Trinity Equipment Co., a sales and distribution organization to the rail industry I purchased in 2007. Our company has actively provided distribution services to the industry since 1986, and we have worked very closely with TTX from the onset. I have worked in the rail industry since 2001, in addition to time in the fastener and automotive industries in sales and engineering capacities. Additionally, I have 23 years of active and reserve service to the United States Navy, retiring in 2013.

Our company performs both sales representation and distribution out of our own warehouse. Several of these products are sold to TTX including alloy steel wear plates, proprietary liners, and lubricants for freight car center bowls. These products are essential for the safe and reliable performance of the freight car fleet that TTX engineers and maintains so carefully.

We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's pooling authority because not only is TTX an important customer to us, but also because its successful growth is a benefit to the entire industry. Here are some ways by which TTX provides an ongoing benefit to Trinity Equipment as well as the rest of the industry:

Benefits from TTX investment in equipment:

TTX facilitates continuing investment by the U.S. railroad industry in intermodal equipment supply.

- Over the last decade or more, TTX has played a very positive role in the railroad industry, fostering a significant expansion of intermodal traffic and contributing to the health of the car building industry.
- We do not believe that individual railroads alone could have sustained the same level of investment and growth in car supply without the capital TTX makes available and the efficiencies of operation that TTX achieves.

the future on track

3918 Holton Road • Muskegon, MI 49445 • PH 440/871-4771 • FX 440/871-3464

www.trinityequipmentco.com • info@trinityequipmentco.com

Trinity Equipment Co.

Benefits from TTX's research, design, and acquisition activities:

TTX has worked with car builders, parts suppliers, and shippers to develop new equipment types and improve the performance of existing cars in its fleet.

- TTX chooses suppliers based on objective criteria embodied in its SECO program.
- TTX's SECO program benefits the entire industry, not just TTX; it allows our company to offer buyers a measure of the quality we provide and helps us compete for orders.
- TTX works closely with us to improve the design and reliability of our equipment.
- TTX facilitates rapid adoption of new ideas and new technologies for improving equipment in the flatcar fleet.
- TTX orders reflect an acknowledgement of quality that is an important selling point in our sales to other equipment buyers.

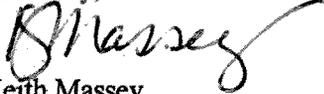
TTX's benefits in promoting the growth of rail intermodal traffic:

TTX promotes intermodal growth through all of its efforts to provide an efficient and adequate supply of high-quality flatcars

- ❖ Over the past 30 years, TTX has played a critical role in promoting the growth of rail intermodal traffic. The continued expansion of rail intermodal traffic is critical to the growth of the car building and equipment supply industries.
- ❖ The continued growth of intermodal transportation and success of TTX will help assure the continued growth of our company.
- ❖ TTX's efforts to promote intermodal growth have paid off and resulted in far higher sales than could have been achieved if railroads were left to their own devices.

We consider approval of TTX's application for a fifteen year extension of its pooling authority to be of critical importance to the continued growth of our business and the railroad industry as a whole.

Sincerely,


Keith Massey
President

the future on track

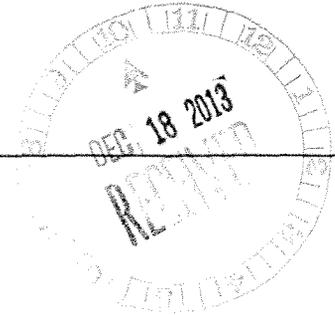
Exhibit 32



United Arab Agencies, Inc.
511 South Avenue East
Cranford, NJ 07016
U.S.A.

+1-908-272-0050
+1-908-272-9221

235404



ENTERED
Office of Proceedings
January 16, 2014
Part of
Public Record

December 13, 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 writing to you in support of TTX's application for a 15-year extension of TTX's flatcar pooling authority.

I am President for United Arab Agencies, Inc. headquartered in Cranford, New Jersey. United Arab Agencies, Inc. is a global transportation carrier that is heavily involved in the movement of containers to and from North America. We handle a wide variety of consumer and industrial goods, primarily between overseas locations and points throughout North America.

Rail-oriented intermodal is integral to our business activities in North America. Over 50% of our international container traffic moves via rail through the U.S. and Canada. We serve every major market in the U.S. and Canada by rail from many different ports. United Arab Agencies, Inc. owns or charters the vessels it operates, but contracts with the railroads for services in the U.S. Railcar supply is a critical service component, as we offer a scheduled product that requires a reliable flow in order to support production line and distribution demands.

We understand that TTX is applying with the STB to extend its flatcar pooling authorization for 15 years. As in 2004, United Arab Agencies, Inc. strongly supports an extension of TTX's pooling authority. A reliable, efficient supply of railcars is essential for our customer's supply chains and the stability of the intermodal product.

The TTX railcar pool has provided stability due to TTX's ability to react to rapid market demand shifts through effective fleet management and capital investment. TTX's structure ensures that cars flow freely between the railroads, car quality is maintained, and sufficient capacity is

available to support fluctuating demand. Without a shared railcar pool, costs would rise, impeding the continued growth of intermodal transportation. More cargo would shift to the highway, increasing the cost of consumer products we use every day.

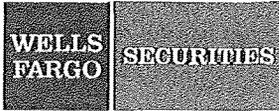
United Arab Agencies, Inc. considers the approval of TTX's application to be of great importance to the continued growth of our business.

Sincerely,

A handwritten signature in black ink, appearing to read "Anil J. Vitarana". The signature is fluid and cursive, with a large initial "A" and "V".

Anil J. Vitarana
President

Exhibit 33



550 South Tryon Street
Charlotte, NC 28202

April 17, 2014

Ms. Victoria A. Dudley
Vice President and Chief Financial Officer
TTX Company
101 North Wacker Drive
Chicago, IL 60606

Re: Application of TTX Company for Reauthorization of Pooling Authority (the "Application")

Dear Ms. Dudley:

My name is John Scerri and I am a Director at Wells Fargo Securities, LLC ("Wells Fargo"). I have been employed at Wells Fargo for twelve (12) years and have previously been involved in underwriting TTX Company's debt securities offerings. I understand that this statement will be submitted for the Surface Transportation Board's consideration of a proposed extension of TTX Company's current pooling authority. Although TTX Company ("TTX") asked me to prepare this statement, the conclusions described herein are mine and have been reached based upon observations made through my participation underwriting the offering of TTX debt securities to finance flatcar acquisitions. The information, commentary and viewpoints contained herein are made without representation or warranty (express or implied) as to the accuracy or completeness of such information, commentary and viewpoints and Wells Fargo disclaims any and all liability in connection herewith.

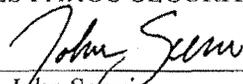
Wells Fargo has participated in the offering of debt securities for TTX in the past and I have personally been involved with those debt security offerings. Wells Fargo also works with a number of TTX's peers within the rail industry.

TTX believes that, given the long-lived nature of TTX's fleet of flatcars, it is prudent in most cases to finance its acquisitions with debt with similarly long-dated maturities.

It is my opinion that the term of TTX's pooling authority is an important element in a long-term investor's review of TTX's creditworthiness and its decision concerning acceptable financing terms. Existing and potential investors are sensitive to the term of TTX's pooling authority. Consequently, financing terms beyond the remaining life of the authority create uncertainty and perceived risks that can translate to higher funding costs and diminished funding supply. If TTX receives the minimum 15-year term that they seek in this Application, it would, in my opinion, be beneficial to TTX in its debt financing efforts. Such a term should provide debt investors with an increased degree of confidence and, as a result, debt funding costs to TTX could reasonably be expected to be lower compared to what might be available if TTX receives a shorter term extension.

Very truly yours,

WELLS FARGO SECURITIES, LLC

By: 
Name: John Scerri
Title: Director

Together we'll go far



Exhibit 34



December 11, 2013

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



235408

ENTERED
Office of Proceedings
January 16, 2014
Part of
Public Record

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

Dear Ms. Brown:

I am writing to you in support of TTX's application for a 15-year extension of TTX's flatcar pooling authority.

I am Senior Vice President, Logistics for Yang Ming (America) Corp., headquartered in Jersey City, NJ. Yang Ming (America) Corp. is a global transportation carrier that is heavily involved in the movement of containers to and from North America. We handle a wide variety of consumer and industrial goods, primarily between overseas locations and points throughout North America.

Rail-oriented intermodal is integral to our business activities in North America. Over 40% of our international container traffic moves via rail through the U.S. and Canada. We serve every major market in the U.S. and Canada by rail from many different ports. Yang Ming (America) Corp. owns or charters the vessels it operates, but contracts with the railroads for services in the U.S. Railcar supply is a critical service component, as we offer a scheduled product that requires a reliable flow in order to support production line and distribution demands.

We understand that TTX is applying with the STB to extend its flatcar pooling authorization for 15 years. As in 2004, Yang Ming (America) Corp. strongly supports an extension of TTX's pooling authority. A reliable, efficient supply of railcars is essential for our customer's supply chains and the stability of the intermodal product.

The TTX railcar pool has provided stability due to TTX's ability to react to rapid market demand shifts through effective fleet management and capital investment. TTX's structure ensures that cars flow freely between the railroads, car quality is maintained, and sufficient capacity is available to support fluctuating demand. Without a shared railcar pool, costs would rise, impeding the continued growth of intermodal transportation. More cargo would shift to the highway, increasing the cost of consumer products we use every day.

Yang Ming (America) Corp. considers the approval of TTX's application to be of great importance to the continued growth of our business.



Sincerely,

A handwritten signature in cursive script, appearing to read 'C.T. Tun', written in dark ink.

Capt. C.T. Tun
Senior Vice President, Logistics
Yang Ming (America)