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Maersk Line Agency  
9300 Arrowpoint Blvd  
Charlotte, NC 28273

Phone: 704-571-2000  
maerskline.com

November 19, 2013

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

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 Craig Mygatt, Senior Vice President of Country Operations for Maersk Line. I have 24 years experience with ocean shipping and have served as a Board member of Maersk agencies throughout the Americas. I have held this latest position for nearly 3 years and hold a Master of Science degree in Transportation from the University of Denver.

A.P. Moller - Maersk was established in 1904 and Maersk Inc was established in New York in 1943 as the General Agent in North America for the A.P. Moller-Maersk Group. Maersk Line is the container shipping segment of A.P. Moller – Maersk group handling over 600 vessels, of which the new 18,000 teu 'Triple E' ships are a part of. Maersk Line has over 3.4 million containers in the fleet and makes a port call every 15 minutes.

As part of the container shipping activities, Maersk Line serves the majority of significant cities in North America with 600,000 containers annually moving to inland destinations. We work closely with every class 1 railroad and collaborate with over 1,000 truckers. We serve important markets such as Chicago, Columbus, Ohio, Memphis, TN, Dallas, TX, Kansas City, Kansas, St. Louis, Missouri along with the port portfolio. We also have dedicated services and a U.S. Flag company, Maersk Line Limited, to serve the U.S. Government activities such as military goods, food aid and embassy stores.

Our rail cargo moves throughout the rail network with railcars primarily supplied and managed through the TTX pooling arrangements. With the volume handled through the Maersk Line activities, it is important that we have reliable, consistent, economical and an environmentally friendly service. TTX's management of the rail flatcar fleet is the best option in rail car management to support our achievement of these goals in rail transportation.

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.

The benefits we see include

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- ❖ TTX has been able to respond rapidly to shifts in equipment demand with increased investment in particular equipment types. Over the last decade, TTX has cut down thousands of 48-foot intermodal cars to more efficiently handle the 20-foot and 40-foot containers used in international shipping.
- ❖ Since TTX takes the capital and ownership risk, expansion of the intermodal fleet with new and modified equipment can occur more rapidly in response to market demands.
- ❖ TTX pool cars move across the railroad network without restrictions.
- ❖ The TTX pool accommodates seasonal, competitive, and other shifts in demand for intermodal flatcars.
- ❖ The availability of a shared pool of intermodal cars ensures that, whichever railroad we use, and whichever lanes we use, we will have access to a supply of railcars that are tailored to our needs, particularly double-stack cars with 40-foot wells.
- ❖ TTX has demonstrated its commitment to provide a fleet of high-quality, well-maintained intermodal cars.
- ❖ Intermodal transportation has grown dramatically, and its future expansion is critical to a healthy, productive economy.
- ❖ Increased use of intermodal transportation conserves fuel and reduces congestion and wear on our nation's highways.
- ❖ The continued growth of intermodal transportation and the continuation of the TTX flatcar pool will increase our company's ability to operate successfully.

In conclusion, Maersk Line support's 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. Maersk Line continues to see growth in the North American intermodal market and believe that TTX pooling is the best option to support the growth and management of rail flatcars.

Sincerely,

Maersk Line Agency North America

A handwritten signature in black ink, appearing to read "Craig Mygatt".

Craig Mygatt  
Senior Vice President  
Country Operations