

EXPEDITED CONSIDERATION REQUESTED
PUBLIC VERSION
BEFORE THE SURFACE TRANSPORTATION BOARD

239424

ENTERED
Office of Proceedings
October 23, 2015
Part of
Public Record

Docket No. FD 35964

**AMERICAN CHEMISTRY COUNCIL, THE CHLORINE INSTITUTE,
AND THE FERTILIZER INSTITUTE**

**-PETITION FOR DECLARATORY ORDER—
POSITIVE TRAIN CONTROL**

**COMMENTS OF MILLIKEN AND COMPANY IN SUPPORT OF
PETITION**

Milliken and Company (“Milliken”) submits the following comments in support of the petition of the American Chemistry Council, the Chlorine Institute, and the Fertilizer Institute (“Petitioners”) in the above captioned matter.

Milliken is a global specialty chemical company with a manufacturing base in the United States. The current uncertainty as to whether Congress will extend the deadline by which the main line railroads must implement positive train control is already disrupting Milliken’s operations. Suppliers have notified Milliken that they cannot guarantee shipment of key materials past December, 2015. To ensure that Milliken is able to meet customer commitments and not significantly disrupt key consumer products ranging from home comfort and cleaning to automotive, Milliken has been forced to execute higher cost contingency plans outside of the United States. Milliken is spending substantial sums today because of the uncertainty about the deadline for positive train control implementation.

Respectfully submitted on behalf of Milliken and Company

By 

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POSTIVE TRAIN CONTROL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Comments of Milliken and Company in support of Petition was electronically submitted to the Surface Transportation Board, Department of Transportation via http://www.stb.dot.gov/stb/Other_Submissions.nsf/wCorrespondence?OpenForm on October 23, 2015 and copies were provided by U.S. Mail, postage prepaid, to the following:

Name	Address	Filed for
Raymond A. Atkins	1501 K Street, NW Washington, DC 20005	Association of American Railroads
Laura Chambers	1560 Wilson Blvd # 1250 Arlington, VA 22209	National Association of Chemical Distributors
Timothy Gaffney	100 Sunny Sol Blvd. Caledonia, NY 14423	Jci Jones Chemicals, Inc.
Jennifer Gibson	1560 Wilson Blvd., Suite 1250 Arlington, VA 22209	National Association of Chemical Distributors
Patrick H. Hawkins	2381 Rosegate Roseville, MN 55113	Hawkins, Inc.
Chris Henney	President And Ceo 5151 Reed Rd. Suite 126-C Columbus, OH 43220	Ohio Agribusiness Association

Name	Address	Filed for
Howard Kaplan	Us Magnesium Llc 238 North 2200 West Salt Lake City, UT 84116	Us Magnesium Llc
Jeffrey O. Moreno	Thompson Hine Llp 1919 M Street, Suite 700 Washington, DC 20036	American Chemistry Council, The Chlorine Institute, And The Fertilizer Institute
Robert Namoff	Allied Universal Corporation 3901 NW 115 Avenue Miami, FL 33178	Allied Universal Corporation



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ON BEHALF OF
MILLIKEN AND COMPANY