



# The Fertilizer Institute

Nourish, Replenish, Grow

October 23, 2014

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The Honorable Daniel R. Elliott  
Chairman  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423

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Office of Proceedings  
October 24, 2014  
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Public Record

RE: Surface Transportation Board Docket No. EP 724 (Sub-No. 3), United States  
Rail Service Issues – Data Collection, October 8, 2014

Dear Chairman Elliott:

On behalf of The Fertilizer Institute's members, I am writing concerning the Board's October 8 decision in the above referenced proceeding. The Fertilizer Institute (TFI) is the leading voice of the fertilizer industry, representing the public policy, communication and statistical needs of producers, manufacturers, retailers and transporters of fertilizer. The Institute's members play a key role in producing and distributing vital crop nutrients, such as nitrogen, phosphorus and potassium, which are used to replenish soils throughout the United States that in turn produce healthy and abundant supplies of food, fiber and fuel. Fertilizers make it possible for farmers to grow enough food to feed the world's 7 billion people. 40 to 60% of global food production is made possible by effective use of fertilizer.

TFI commends the Board for its efforts to increase transparency when it comes to the recent rail service problem in this country by requiring Class I rail carriers to provide key service metrics. We are particularly appreciative of the Board's attention last Spring to fertilizer shipments on BNSF Railway and the Canadian Pacific Railroad. However, we are concerned that the October announcement by the Board does not require separate reporting for fertilizer shipments which are critical to the placement of fertilizer for next year's Spring planting, as well as the fertilizer needed for farmers this Fall.

The Board's new reporting requirements focus extensively upon grain shipments. To the extent the order mentions other commodities, it does not include fertilizer shipments. While we agree that the Fall grain harvest is crucial, next year's harvest will be impacted without timely application of fertilizer this Fall and next Spring.

Several of the Board's key service metrics for commodities other than fertilizer will impact the delivery of fertilizer. Fertilizers, especially phosphate, potash and urea are unit train shipments. Items 4, 5, and 6 should include fertilizers.

Additionally, large amounts of fertilizers and grain are a shared fleet. Item 7, among the data requirements, requires rail carriers to report the total number of grain cars loaded and billed. TFI

and its members are concerned that this emphasis on grain car loadings will provide incentives for rail carriers to prioritize grain shipments over fertilizer shipments when allocating rail cars because the Board is monitoring the former, not the latter. Therefore, Item 7 is critical and should include fertilizers.

TFI believes the omission of fertilizer from the order was an oversight and we request the Board to take immediate and appropriate steps to address this unintended omission.

Thank you again for the attention you have directed to these critical rail service issues. Your oversight is most helpful. Please do not hesitate to contact me at (202) 962-0490 to address any questions you may have regarding TFI's perspectives on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Jahn', with a long horizontal flourish extending to the right.

Chris Jahn  
President  
The Fertilizer Institute