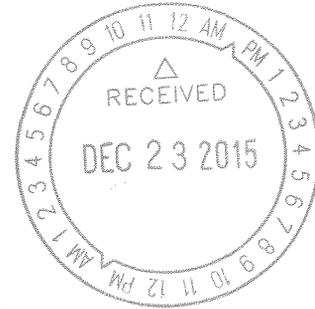


*The*  
**Fertilizer Institute**  
Nourish, Replenish, Grow



December 21, 2015

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

239772

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Office of Proceedings  
December 23, 2015  
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Public Record

Re: *Docket No. EP 724 (Sub-No. 4)*

Dear Ms. Brown:

Thank you for the opportunity to participate in *ex parte* communications with Surface Transportation Board (STB) staff on railroad performance data reporting. I write in reference to Docket No. EP 724 (Sub-No. 4) and to follow-up on the Nov. 23rd meeting between The Fertilizer Institute (TFI) and Board Staff.

TFI represents companies that are engaged in all aspects of the fertilizer supply chain. Our members play a key role in producing and distributing vital nutrients that nourish crops to meet the global demand for food, fiber, and fuel. Rail service challenges, perhaps most starkly experienced in 2013 and 2014, can greatly impact the timely delivery of these necessary crop nutrients to farmers. Forty to sixty percent of crop yields are attributable to fertilizer. Without fertilizer, it is impossible for our nation's farmers to produce \$225 billion worth of crops that they provide for us annually.

The Nov. 23rd discussions included a question regarding fertilizer industry train movements on unit and manifest trains. Overall for the fertilizer industry, the vast majority of train movements are manifest. The most recent data for 2014 and 2015 shows that 86 percent of movements were in manifest trains and 14 percent were in unit trains.

As noted in the Nov. 23rd meeting, the fertilizer industry depends year-round on a safe, reliable, and efficient railroad transportation marketplace. Rail shipments of fertilizer are equally distributed across the year: 24 percent in the Winter; 27 percent in the Spring; 24 percent in the Summer; and 25 percent in the Fall.

As a necessary crop input, the safe and timely delivery of fertilizer to the farmer is an issue of critical importance to the entire agriculture sector. With this in mind, TFI respectfully urges the STB to make fertilizer a permanent part of its railroad performance data reporting requirements of Docket No. EP 724 (Sub-No. 4).

Thank you for again for the opportunity to engage with Board Staff on this important matter.

Sincerely,

Chris Jahn  
President  
The Fertilizer Institute