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October 13, 2016

Mr. Daniel Elliott
Chairman
U.S. Surface Transportation Board
395 E Street SW
Washington, DC 20423

Mrs. Deb Miller
Vice Chairman
U.S. Surface Transportation Board
395 E Street SW
Washington, DC 20423

Mrs. Ann D. Begeman
Board Member
U.S. Surface Transportation Board
395 E Street SW
Washington, DC 20423

Dear Chairman Elliott, Vice Chairman Miller and Member Begeman:

The Ohio Chamber of Commerce is Ohio's oldest and most diverse business organization. On behalf of our nearly 8,000 business members, I am writing to express our concern with the U.S. Surface Transportation Board's proposed new regulations on freight railroads.

The heart of our nation's freight rail system runs through the Buckeye State. With the fourth largest freight rail infrastructure in the nation, Ohio's role as a cargo transportation hub is a major driver of the state's economy. Across Ohio, railroads are a crucial component in transporting almost 144 million tons of cargo that originate or terminate in the state every year. They also employ thousands of Ohioans in well-paid, community sustaining jobs.

Presently, Ohio manufacturers and farmers have access to some of the greatest logistical options and efficiencies in the nation – and their ability to continue to access affordable, efficient freight rail transportation is vital.

That is why we are deeply concerned by the U.S. Surface Transportation Board's aggressive and unprecedented effort to implement burdensome new rules. Over time, the result of these rules would be to shrink the size of the rail network and impede the efficient flow of commodities to and from our factories and ports. In short, the proposed rules would undermine the financial health and stability of our nation's rail network.

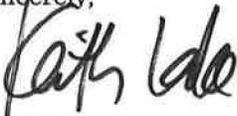
The Staggers Rail Act of 1980 created a balanced regulatory framework that allowed railroads to run like businesses and earn enough capital to invest back into their network – which they have. As freight railroads invest record amounts in their infrastructure, Ohio will continue to be a major beneficiary of these private sector enhancements.

Conversely, the ripple effect of regulations which impede the efficient flow of commodities and chill railroad's investment in a highly effective freight rail network would be disastrous to a state like Ohio. Without a well-maintained rail network to rely on, Ohio businesses are less likely to find new customers, hire new workers, or invest in their facilities.

Further, the small businesses, service providers, and others who rely on freight rail's connections to domestic and international markets will wither without these essential services.

For these reasons, and because these burdensome new rules would undermine the existing economic regulatory framework under which the nation's rail network operates, the Ohio Chamber urges the Board to substantially modify or abandon these pending regulations. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Lake". The signature is written in a cursive, somewhat stylized font.

Keith Lake

Vice President, Government Affairs