



The Dow Chemical Company  
Midland, Michigan 48674  
USA

April 12, 2011

via e-filing

229199

Rachel Campbell  
Chief of the Section of Administration, Office of Proceedings  
Surface Transportation Board  
395 E Street, SW  
Washington, D.C. 20423

**RE: Ex Parte No. 705, *Competition in the Rail Industry***

Dear Ms. Campbell:

The Dow Chemical Company ("Dow") submits this letter in response to the "Notice" served by the Surface Transportation Board ("STB" or "Board") on January 11, 2011, in Ex Parte No. 705, *Competition in the Railroad Industry*. Dow is a member of the American Chemistry Council, which is filing Joint Comments in this proceeding as part of coalition of trade associations and industry organizations, under the moniker of the "Interested Parties." In those Joint Comments, the Interested Parties detail the multitude of substantial changes that have occurred in both the state of competition in, and the financial health of, the rail industry. Furthermore, they clearly lay out the Board's authority to create greater rail competition through existing statutory provisions and urge the Board to adopt policy changes to the way it historically has implemented those statutory provisions. Dow, in particular, supports changes that would greatly expand access to reciprocal switching and bottleneck rates.

Dow's competitive position is handicapped by the fact that so much of its U.S. production is captive, and to a single railroad. Greater rail competition will enhance the competitiveness of Dow.

Sincerely,

Global Logistic Purchasing Director

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