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Public Comments on Competitive Switching and Reciprocal Switching: =====

Title: Competitive Switching and Reciprocal Switching

**EP 711 (Sub-No. 1)**

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Category: Public Comment(s)

Comment: Reviewing Docket No. EP 711, PETITION FOR RULEMAKING TO ADOPT REVISED  
COMPETITIVE SWITCHING RULES I find reason to make comment.

First, my general impression is that this change is not being proposed because of any overt problem that exists for either the shippers or the railroads. Next, why might it be offered? I recall back to the mid 1970s before even the Staggers Act, back to 3RA and 4RA. (For a time 1975-76, I was director of Railroad Planning for the State of Indiana.) At that time many shippers supported the retention of many extraneous rail segments even though they seldom if ever used rail at all. The motivation was premised on competition with other modes of travel particularly motor truck. EP 711 comes close but I think never introduces other competitive modes. Second, the use of R/VC pricing seems to ignore relevant shipper differentials. If a shipper is moving flammable liquid the costs are substantially different than if they are moving grain. Insurance will be different, speeds might be different, and the comparisons will be dramatically more complex than suggested. Also, the entire NITL petition seems premised on interchange between Class I rail carries and any other carrier (p20). This sounds similar to my question above about motor trucks. The question of what is a reasonable distance? is raised but measurement of these arbitrary distances seems vague. Is it 30 miles as the crow flies or 30 miles over the shortest rail segments? I remember an issue with what in 1976 we called the Duff Junction running track which connected the PennCentral with the B&O and ran from Duff Junction to Washington. The question occurs to me that a change in the switching rules would require negotiations for at least 2 switches adding distance and time. It seems changing something that isn't broken or wrong is counterproductive.

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