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ENTERED
Office of Proceedings
April 8, 2014
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Public Record



April 3, 2014

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

RE: Finance Docket No. 27590 (Sub-No. 4)
TTX Company – Application for Reauthorisation of TTX Flatcar Pool

Dear Ms. Brown,

We are writing to you concerning the above captioned matter, which we understand is currently under review by the Board. Please give consideration to the contents of this document during your review process.

National Steel Car is a railroad freight car manufacturing company that has provided TTX with many of the railcars it utilizes in its railcar pool. National has provided TTX with the following car types:

- i. articulated all-purpose double stack well cars, which carry ocean and domestic containers as well as highway trailers;
- ii. articulated double stack well cars, which carry ocean and domestic containers;
- iii. stand alone well cars, drawbar connected or coupled, which carry ocean and domestic containers;
- iv. articulated spine cars which carry ocean and domestic containers, as well as domestic highway trailers; and
- v. 89' flat cars which carry highway trailers and are also outfitted with auto-racks for the domestic delivery of new finished automobiles. These cars are also used for the transportation of specialty goods such as pipe and heavy steel sheet and plate.

National Steel Car supports TTX's Application for three reasons, set forth below:

- Productivity of the fleet,
- Financial benefit to America's railroads; and
- The U.S. national interest.

Productivity

Pooling railroad freight equipment provides the opportunity to obtain high productivity, compared to equipment that is not pooled. Because the equipment can be loaded and moved in any direction, the unproductive empty movement of cars is reduced saving the railroads substantial operating costs. The efficiency of the pool allows TTX to provide flat cars at reduced rates, as TTX can pass on the results of its higher productivity, allowing the railroads to market them more effectively and grow intermodal service for the benefit of the shipping public. In our view, the presence of the TTX flatcar pool has been a key contributor to the success and growth of intermodal.

Financial Benefit to America's Railroads

The American railroad industry is among the most highly capital-intensive in the country. Large carriers are responsible for thousands of miles of track, bridges, trestles, tunnels, road crossings, terminals and equipment. With these demands, it is clear that the industry could not fund all of its demands for equipment, especially in high growth markets like intermodal and finished vehicle transport. By shouldering the capital burden of the railcars that support these markets, TTX allows the railroads to continue to expand these markets, while not having to extend the capital investment within their own industrial organisations, fostering growth system-wide. This is to the benefit of companies like ours and, more important, to the benefit of the shipping public which enjoys the access to a supply of needed equipment that might not be as large without TTX's participation.

U.S. National Interest

TTX deploys substantial resources to analyze the need for new equipment on a system-wide basis to be sure that it has adequate equipment to meet the needs of all of its owners. While no railroad is prevented from supplying its own fleet, the presence of TTX means that there will be a ready supply of cars that is adequate to the needs of the member carriers based on predicted growth. It also has enhanced competition because the railroads have been able to establish marginal services and grow them without having to invest the capital in new equipment, since TTX has done that.

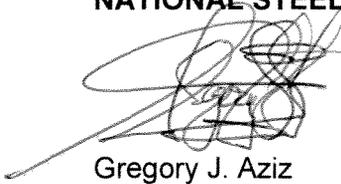
Moreover, TTX's cars have been increasingly standardised to improve efficiency. This has served to foster a mature and stable market in which the participants – the car builders, steamship lines, trucking companies and railroads – have been able to achieve enormous efficiencies. The resulting system has been a great benefit to the shipping public and to the economy generally. And, the more goods travel by rail, the fewer trucks and trailers travel the Nation's highways, saving in highway repair costs.

Conclusion

Although this submission provides only a brief overview of the activities and benefits of the TTX pool, in our view there is only one conclusion that, upon reflection, the Board can reach. As a model both in theory and in practice, the TTX railroad car equipment pool is unique in its efficiency and productivity. National Steel Car supports, most vigorously, the immediate re-authorisation of the TTX Company flatcar pool as submitted in its Application.

Very truly yours,

NATIONAL STEEL CAR LIMITED

A handwritten signature in black ink, appearing to read 'Gregory J. Aziz', is written over a faint, illegible printed name. The signature is fluid and somewhat stylized, with a long horizontal stroke extending to the left.

Gregory J. Aziz
Chairman & CEO