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

Dear Chairman Elliott, Vice Chairman Miller and Member Begeman:

On behalf of the freight railroads who operate in the Great Lakes State, the Michigan Railroads Association respectfully submits significant concerns with the proposed Surface Transportation Board's rules that would negatively impact customers and families in our state.

The proposed rules regarding changes to the regular and efficient operations of freight railroads threatens the viability of companies throughout Michigan who rely on dependable and safe rail service. It should also be noted that there is no evidence that the STB proposal will have a positive effect on the railroad industry and communities throughout Michigan.

The ability of the freight railroad industry to deliver affordable, efficient rail services is vital. The small businesses, service providers and others – from Monroe to Iron Mountain – rely on freight rail's connections to domestic and international markets will. The vast regulatory burdens on customers and the economy produce unnecessary roadblocks. We should not add more hurdles for the rail industry and businesses here in Michigan – especially when data is lacking to support additional regulations.

The STB's overreach and in this area will surely undermine the financial health and stability of Michigan's rail network – and will impact the nation's entire rail system. The results of re-regulating the rail industry will most certainly have a devastating effect on the vibrant auto industry which depends on an efficient rail system to move finished automobiles across the country. Michigan's agricultural industry, which exports various products not just across the eastern half of the U.S., but internationally as well, will experience negative results from these new rules and regulations.

The Michigan Railroads Association strongly urges the Surface Transportation Board to substantially alter or abandon these pending regulations. It is our position that the broad economy in Michigan will experience diminished and disappointing results from the STB's proposed changes.

Regards,



Jon Cool, President  
Michigan Railroads Association