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HUNTSMAN

May 19, 2011

Brian V. Ridd
Senior Vice President
Purchasing and Distribution

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Ms. Cynthia Brown
Chief of the Section of Administration
United States Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

RE: Ex Parte No. 705

Dear Ms. Brown:

Huntsman Corporation is a manufacturer and marketer of differentiated chemicals used in a wide variety of industries, with approximately 12,000 employees worldwide and 2010 revenues of over \$9 billion. We understand that the Surface Transportation Board is reviewing the level of rail competition in the national rail system. Our company appreciates the opportunity to register our support for increased competition for rail dependent shippers such as Huntsman.

Huntsman depends on reliable and affordable shipments of products via rail to remain competitive in an increasingly competitive global market place. Huntsman has six plants that are captive to one railroad. These six locations in three U.S. gulf coast states account for over 6200 tankcar shipments per year and represent over \$33MM in rail freight spending. We have two other Huntsman locations in Texas and Louisiana that are not captive due to trackage rights provided to another carrier. However, the trackage rights, as currently structured at these locations, do not provide a truly competitive alternative for the incumbent railroad.

Competition is the cornerstone of our national economy and the nation's freight rail policy - and what the freight railroads sought in 1980 when they advocated the enactment of the Staggers Rail Act. The irony today is that foreign products imported into our nation in containers enjoy the benefits of rail competition while many domestic rail dependent shippers do not when moving freight around our nation on the national freight rail system. Thus, our current freight rail policy acts to undermine the competitiveness of American manufacturing.

A competitive national rail system is essential to American competitiveness, the creation of American jobs, increased American exports and a healthy national economy. We encourage the Board to revise its policies to ensure the maximum rail-to-rail competition possible in our current consolidated freight rail system, as intended by the enactment of the Staggers Rail Act.

Sincerely,

