



**Supporting
Organizations**

Alliant Energy
American Chemistry Council
Checker Logistics, Inc.
Chippewa Valley Bean Co.
Citizens Utility Board
Cooperative Network
Customers First! Coalition
Dairyland Power Cooperative
Domtar Industries
ERCOWorldwide (USA) Inc.
Georgia Pacific
Great Lakes Timber Professionals
Assoc.
Green Bay Area Chamber of
Commerce
Green Bay Packaging
IBEW Local 2150
Lake States Lumber Assoc.
Leicht Transfer & Storage
Louisiana-Pacific
Madison Gas & Electric
Manitowoc Grey Iron Foundry
Manitowoc Public Utilities
Menasha Utilities
Midwest Food Processors Assoc.
Municipal Electric Utilities of WI
Neenah Foundry
NewPage
Ort Lumber
Packaging Corporation
of America
Procter & Gamble
Sadoff Iron & Metal Company
Tomahawk Regional Chamber of
Commerce
Wausau Paper
We Energies
WI Agri-Service Association
WI Cast Metals Association
WI Corn Growers Association
WI Farm Bureau Federation
WI Farmers Union
WI Crop Production Assoc.
WI Industrial Energy Group
WI Manufacturers & Commerce
WI Paper Council
WI Public Service Corp.
WI Utilities Association
WPPI Energy
Wolf River Lumber, Inc.

April 16, 2014

BY E-FILING

Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E Street S.W.
Washington D.C., 20423-0001.

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ENTERED
Office of Proceedings
April 16, 2014
Part of
Public Record

Re: STB Docket No. EP 724, United States Rail Service Issues

Dear Ms. Brown:

On behalf of the Wisconsin businesses and organizations of Badger CURE (Consumers United for Rail Equity), we appreciate the opportunity to comment on rail service issues in Docket EP 724. Wisconsin businesses that rely on freight rail have not been immune to the recent, and serious, rail service problems that have impacted much of the country over the last few months. While these issues deserve a thorough investigation, we also urge the Surface Transportation Board to look at the recurring service issues many shippers are experiencing, and which cannot be blamed on the weather. Any investigation into the adequacy of freight rail service, therefore, should consider the lack of competition in the freight rail industry as a significant underlying factor.

Wisconsin is served by four Class 1 railroads, BNSF, UP, CP, and CN, yet the vast majority (over 80 percent) of rail stations in the state has access to only one railroad. The lack of adequate rail service has been a problem for some Wisconsin shippers for many years. The recent increase in service issues in the state seem to be related to rail movements from the western part of the United States. Wisconsin businesses that rely on western rail, such as electric utilities and metal casting foundries, have been hit particularly hard by inadequate freight rail service the last few months.

Most of the coal used by Wisconsin electricity providers is delivered by rail from the Powder River Basin in Wyoming. Significant delays and disruptions in coal deliveries have been reported by some of the state's electricity providers. Dairyland Power Cooperative only received about one half of their normal coal deliveries during the winter period which required them to truck coal to ensure their generators continued to operate. There is considerable concern about the potential impact on electric reliability if these service issues are not addressed before summer when electricity demand is at its highest.

Surface Transportation Board
Docket No. EP 724
Comments of Badger CURE
4/16/14

Wisconsin's foundry industry has also been severely affected by the recent service problems with freight rail. Many companies were close to shutting down last month because they could not get raw materials delivered on rail from the West Coast. One foundry owner called it the worst crisis his company ever faced.

The current and future economic well-being of many of our state's leading industries is tied to dependable and economically reasonable rail service. The Board must hold the rail industry accountable for its failure to provide adequate service. The Board should also pursue policy changes to promote a more competitive freight rail industry that would lead to higher level of service from the railroads.

On behalf of Badger CURE,

Sincerely,



Matt Bromley
Coordinator, Badger CURE

Executive Director
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