



The Dow Chemical Company
Midland, Michigan 48674
USA

July 25, 2011

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

Re: Ex Parte No. 711 – Petition of The National Industrial Transportation League for
Rulemaking To Adopt Revised Competitive Switching Rules

Dear Ms. Brown:

On July 7, 2011, The National Industrial Transportation League filed with the Surface Transportation Board a Petition asking the agency to initiate a rulemaking to adopt revised rules on competitive switching. The Petition follows the Board's general consideration of competition issues in Ex Parte No. 705, Competition in the Railroad Industry and meets the Board's request for proposals to address competitive problems faced by shippers.

The Dow Chemical Company strongly urges the Board to grant the National Industrial Transportation League's Petition and to issue a Notice of Proposed Rulemaking on the proposal detailed by the League. Issuance of a Notice of Proposed Rulemaking on the League's proposal would permit all interested parties to provide comment and guidance on the proposal to improve the state of competition in the rail industry.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Gray", with a long, sweeping underline.

Brad Gray
Global Director, Logistics Purchasing