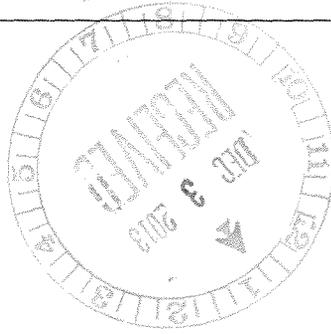




**SUBARU**



**Subaru of America, Inc.**

Subaru Plaza  
P.O. Box 6000  
Cherry Hill, NJ 08034-6000  
856.488.8581

235402

November 27, 2014

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

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

RE: Finance Docket No. 27590 (Sub-No. 4)  
TTX Company-Application For Pooling Reauthorization

Dear Ms. Brown:

My name is Larry Strug; I am the National Transportation Manager for Subaru of America. I have been in this position for over 13 years. Prior to working at Subaru, my past experience was as the Director of International Automotive Marketing for Conrail and previous to Conrail I worked in Logistics for Volkswagen of America and prior to that I worked for Nu-Car Carriers in the trucking industry. Overall I have over 37 years experience in the automotive logistics industry. Additionally I earned a Bachelor of Science Degree in Business Logistics from the Pennsylvania State University.

Subaru of America, markets and distributes Subaru automobiles and parts to a network of over 600 retailers throughout the United States. Our automobiles are manufactured both in the United States and imported from Japan. Our distribution from our U.S. manufacturing is reliant on rail transportation for over 60% of our volumes and over 50% for our imported vehicles. Additionally we utilize rail for the importation of our parts and accessories via intermodal service. Rail provides a predictable, efficient, reliable means to move our products.

TTX provides a vital information link for the supply of empty multi-levels for both our U.S. manufacturing plant and our port facilities. We depend upon TTX and their management skills to support our supply-chain. We understand that TTX is seeking reauthorization of its flatcar pool. We strongly support an extension of TTX's flatcar pooling authority, because we rely on the smooth functioning of the TTX flatcar pool for the growth and success of our continued business.

Sincerely,

Larry Strug  
National Transportation Manager  
Subaru of America