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March 31, 2014

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

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

Dear Ms. Brown:

My name is Jim Gill and I am the Vice President for Business Development at California Cartage. We have been in business since 1944, and provide warehousing, cargo consolidation, and drayage. Currently, we operate over 4.25 million square feet of warehouse space through the United States and Mexico.

A major component of our business is transloading international freight from marine containers into 53-foot “domestic” containers. We are one of the larger firms that perform this service, and we believe that nearly one-third of all import TEUs (twenty-foot equivalent units) that discharge at the ports of Los Angeles and Long Beach transload *and* ship inland by rail. Transloading enables our customers (typically retailers), to better control their inventory and reduce costs. It also enables them to redirect inventory at the last minute. Additionally, we perform quality control inspections, product labeling, price tagging, and similar services.

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 pool flatcar pool for the growth and success of our business and because it will strengthen the intermodal transportation system that we serve.

There are a number of benefits that we, and our customers, receive from TTX. First, since 2004, there has been enormous growth in the amount of containerized imports coming into the U.S. and imports in the L.A. area increased by 50% (with a corresponding increase in intermodal volume). To support this substantial growth, TTX has consistently expanded its fleet to keep pace with the demand.

Moreover, TTX has kept pace with the right type of intermodal well car. The growth rates for imports, transloads, and intact shipments (i.e. shipping marine containers inland) are not homogeneous. TTX pays attention to the unique growth rates of these market segments and has been able to rapidly respond to shifts in demand with increased investment in particular

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equipment types. Recently, transloading has grown at a much faster rate than imports into L.A. or Long Beach and TTX expanded its fleet of 53-foot well cars to accommodate this demand.

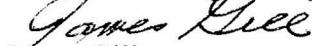
Likewise, we and our customers benefit from a pooled fleet as that helps increase rail-to-rail competition. Further, the availability of a shared pool of intermodal cars ensures that whichever railroad our customers (or their intermodal providers use), they will have access to a supply of railcars that are tailored to their needs.

Last, and again while we do not “buy” intermodal rail transportation we work on a daily basis with dozens of major retailers, steamship lines and trucking firms who do rely on it for the safe, efficient, and timely distribution of billions of dollars of goods. Part of the reason of intermodal’s success is its ability to provide low-cost and consist transportation, and TTX’s demonstrated commitment to providing high-quality, well-maintained, and low-cost cars, enables the railroads to provide that service.

In conclusion, we strongly support TTX’s application for a fifteen-year extension of its pooling authority to ensure that TTX will continue to supply efficient and economical flatcar service in the years to come. We consider approval of TTX’s application to be of critical importance to continued growth and success of California Cartage’s business.

Sincerely,

California Cartage Company, LLC



James Gill
Vice President

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