

Diversified CPC International, Incorporated

24338 West Durkee Road | Channahon, IL 60410 | 815-424-2000



October 5, 2010

Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423 – 0001

**RE: STB Ex Parte No. 698, Establishment of the Toxic by Inhalation
Hazard Common Carrier Transportation Advisory Committee.**

To Whom It May Concern:

Please accept this nomination of Sandra Dearden, Highroad Consulting, Ltd., to the above Advisory Committee. Diversified CPC International, Inc. is a manufacturer of blowing agents for the plastic foaming industry, and propellants for consumer aerosol products with manufacturing operations in Illinois, California, New Jersey, and Mississippi, and distribution operations in Florida and Ontario. While my company does not manufacture or receive TIH commodities, we have already seen indications that decisions made relative to TIH commodities will impact on shipments of non-TIH products.

Highroad is a transportation consulting firm known for its knowledge of rail transportation. Highroad's client base includes shippers and receivers of TIH commodities and I believe Ms. Dearden has unique experience and knowledge that could be valuable for this Committee.

Prior to starting Highroad in 1996, Ms. Dearden was General Manager – Marketing & Sales at Chicago & North Western Transportation Company. In that role she was responsible for marketing and sales of Agricultural Chemicals, including anhydrous ammonia. Prior to her promotion to General Manager, she was Market Manager – Chemicals where she was responsible for pricing and marketing of all chemicals including all of the inhalation hazard chemicals.

During her tenure at North Western, Sandra chaired the company's Hazardous Commodities Committee for seven years. The Committee was responsible for development of policies to ensure safe transportation and handling of shipments of hazardous commodities. Members of the Committee included representatives from Transportation (Operations), Safety, Law, and Finance (Insurance).

It is fair and reasonable to include railroad representatives on the Toxic by Inhalation Hazard Common Carrier Transportation Committee. However, railroad representatives will have access to in-house rail costing professionals that shipper representatives will not have unless they hire outside consultants. Ms. Dearden would bring the shippers' perspective to the Committee. As a consultant she has presented cost evidence in a number of proceedings before the Board, and she has earned a reputation for her knowledge of rail costing and regulatory costing.

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Finally, I believe it is important to state that railroad common carrier obligation, mandating their carriage of TIH and other hazardous commodities is not a subject that should be opened for debate. Congress recognizes the importance of common carrier obligation, and railroads are required to provide service and operate in the public interest because the public relies on safe and reliable service and delivery of all products currently shipped via railroad transportation. This is a fundamental principle that should not be questioned or open to debate.

If you have questions or require additional information, please do not hesitate to contact me.

Sincerely,

William F. Frauenheim III
Vice President – Operations
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