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:

This letter is being written on behalf of the Paper and Forest Products Industry Transportation Committee (PFITC), in support of a Petition filed on July 7, 2011 by the National Industrial Transportation League 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.*

PFITC is an association of paper, pulp and forest products logistics professional whose purpose is to work with our transportation and logistics service providers, local, State and Federal governments and other associations to ensure that our industry has access to a transportation network that can provide the services required to ensure our industry remains competitive domestically and globally.

In the Ex Parte No. 705 proceeding, the STB asked for new proposals and solutions to address the competitive problems faced by shippers. The League's Petition outlines the significant changes that have taken place in the railroad industry since the Interstate Commerce Commission adopted rules for reciprocal switching in 1985. The Petition indicates that the agency has the power to change those rules. Most importantly, the Petition sets forth a detailed proposal for a new regime of competitive switching, under which competitive switching would be made available to shippers who are served by only a single, Class I rail carrier and who lack effective inter- or intramodal competition.

PFITC strongly urges the Board to grant the League's Petition and to issue a Notice of Proposed Rulemaking on the proposal detailed by the League. PFITC believes that the League' proposal represents a fair and balanced effort to improve the state of competition in the rail transportation industry, and would provide increased competition for captive shippers without harming carriers. Issuance of a Notice of Proposed Rulemaking on the League's proposal would permit the industry as a whole to comment on the proposal and to guide the Board in its effort to improve the state of competition in the rail industry.

Sincerely,

Glen W Courtwright

Glen W. Courtwright
Director Strategic Operations
Georgia-Pacific LLC
as
President
Paper & Forest Products Transportation Committee