Paper & Forest Industry Transportation Committee

October 30, 2009

Mr. Gary Held
Director, Damage Prevention and Loading Services
AAR / TTCI
Gary.Held@Railinc.com

Subject: Solicitation for Comments: Reduction in the Maximum Allowable Vacant Aggregate Crosswise Closed Car Space from 18" to 6", Rule 5 of AAR Circular No. 42-J

Mr. Held,

This statement by the Paper and Forest Products Transportation Committee (PFITC) is in response to requests for comments regarding consideration of changes to loading rules in AAR Circular No. 42-J.

The Paper and Forest Products Transportation Committee (PFITC) is a non-profit corporation whose purpose is to increase transportation service and safety, provide for multiple transportation service modes, and to improve the quality and quantity of equipment to assure that the paper and forest products industry remains competitive domestically and globally. Safety is a core value of our membership which is comprised of companies who are actively engaged in the distribution of pulp, paper, paperboard or forest products.

Boxcars are the primary equipment type utilized by our member companies for the transportation of forest products. Though various AAR loading configurations are utilized by our member companies depending on the product shipped and/or the specifications of the equipment used, the proposed changes to AAR Circular No. 42-J are a major concern to our membership.

Implementation of the loading requirements as proposed would (1) result in safety risks in the application of lateral bracing when loading and unloading boxcars, (2) potentially increase rail freight transportation expense of some of our products as the increased weight of additional blocking and bracing will reduce the allowable lading weight to ensure that the gross weight on rail (GWR) is not exceeded, and (3) increase the expense for loading boxcars.

As shippers of hundreds of thousands of carloads of forest products annually, PFITC's members have not experienced a significant percentage of in-transit load shifts of our products when loaded in accordance with the current AAR requirements. We believe that the proposed amendment to reduce the permissible maximum aggregate lateral void from 18" to 6" in closed cars is unwarranted and that the current regulations, if properly applied, are adequate to prevent lateral shifting. If catastrophic lateral load shifts are occurring, then we respectfully request that the specific loading pattern(s) experiencing load shifts be amended instead of unilaterally imposing a rule change reducing the allowable lateral void on all box car loading configurations.

In summary, based on our current information PFITC believes that no rule changes are necessary for the loading of forest products in boxcars and that, if properly applied, the current loading rules are sufficient to ensure the safe and efficient transportation of forest products in boxcars. PFITC would be willing to engage in a joint study of the effectiveness and/or shortfalls of the current loading rules and practices of forest products in boxcars, and that until such time that a need for changes to the current loading rules has been demonstrated through additional data and analysis, we respectfully request that that the implementation of the proposed changes be postponed.

Sincerely,
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