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COMMITTEES:  
Appropriations  
Economic Development and Tourism  
Natural Resources and the Environment  
Regulated Industries and Utilities  
Transportation, Chairman

## The State Senate

Atlanta, Georgia 30334

February 11, 2022

The Honorable Martin J. Oberman, Chairman  
Surface Transportation Board  
395 E Street SW  
Washington, DC 20423

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February 14, 2022  
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Dear Chairman Oberman and Members of the Surface Transportation Board,

We write today to share our serious concern about the Board's proposed rule on forced reciprocal switching (EP 711-1).

Georgia is on the top ten list among U.S. states for both its number of freight railroads (29) and track mileage (4,521). Railroads are key arteries for our ports, which are hitting new records every month. It is our concern that this policy of forced access—compelling private rail companies to share their infrastructure with competitors—would cause network inefficiencies that harm Georgia shippers and lead to less overall investment in rail lines.

These concerns about network disruption are shared not only by freight railroads, like Atlanta headquartered Norfolk Southern, but also by rail labor groups, passenger railroads, and several major shippers. That is because rail switching is a complex process that slows rail operations, with just one switch resounding throughout the system. UPS, also headquartered in Atlanta, has opposed the policy and stated that diminished efficiency could result in them having to move containers back to highways.

In the long term, forced switching could also lead to less money invested in Georgia railways if it undermines rail carriers' ability to earn enough to invest in infrastructure. At present, railroads are the sole piece of our logistics network that is self-sustaining, taking nearly no taxpayer funds for the maintenance and growth of tracks from Alpharetta to Waycross; Columbus to Savannah.

It's hard to understate the role rail is playing in Georgia's booming industrial advancement, including the Port of Savannah, which is the 4<sup>th</sup> busiest port in the United States. The Georgia Ports Authority has completed and is now operating the second set of nine new rail tracks for a total of 18 tracks at its Mason Mega Rail Terminal. This expansion increases intermodal capacity to and from the Port of Savannah by more than 30%. Currently, Georgia's ports support almost 440,000 jobs.

The freight railroads that help move Georgia's economy have remained reliable partners despite supply chain challenges. They have moved nimbly to help the Port of Savannah address congestion, re-opening facilities and adding capacity to do what they can as our steady middle miles. We hope that they will continue to play this important role in our state and national economies— and continue to invest in rail infrastructure at high levels.

For these reasons, we hope that you do not take up the proposed rule on forced switching.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Ginn", with a long horizontal flourish extending to the right.

Frank Ginn

February 11, 2022

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Surface Transportation Board  
395 E Street SW  
Washington, DC 20423

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Sincerely,

Terri Anuelwicz  
Representative, District 42  
Georgia General Assembly

Jimmy Burnette  
Mayor  
City of Suwanee

Eric Dial  
Mayor  
Town of Tyrone

Mike Dugan  
Senate Majority Leader  
Georgia General Assembly

Terry England  
Representative, District 166  
Georgia General Assembly

Steve Fuller  
Commissioner  
Carroll County

Frank Ginn  
Chairman  
Senate Transportation Committee  
Georgia General Assembly

Liz Hausmann  
Commissioner  
Fulton County  
Chair, Naco Transportation Committee

Seth Millican  
Executive Director  
Georgia Transportation Alliance

Billy Mitchell  
Representative, District 88  
Georgia General Assembly

CC: Members of the Georgia Congressional Delegation