

RICHARD F. TIMMONS  
PRESIDENT  
AMERICAN SHORT LINE AND REGIONAL RAILROAD ASSOCIATION  
50 F STREET, N.W., SUITE 7020  
WASHINGTON, D.C. 20001-1564  
(202-585-3442)

July 22, 2005

Mr. Roger Nober  
Chairman  
Surface Transportation Board  
1925 K Street, N.W.  
Washington, DC 20423-0001

Dear Chairman Nober:



Attached you will find responses to your request for information concerning preparation of the Class II and Class III railroads for the Fall Peak Season. I focused on port and terminal roads and major interchange locations with the Class I railroads as important locations that might experience congestion. Almost without exception the small railroad industry does not have capacity constraints so specific points in the rail network were the areas of primary concern.

As you will see from the letter responses and the summary matrix, a number of initiatives have been taken to defeat the possibility of congestion. I am confident that the proactive and collaborative approach of the smaller railroads will make a substantial contribution in this regard.

If I may be of further assistance please do not hesitate to contact me.

Respectfully,



Richard F. Timmons  
President

Attachments



## Short Line Preparations for the Peak Shipping Season Fall 2005



	Action Taken											
	Enforcing demurrage and store rules more aggressively	Improving hump operation efficiency	Relocating industry bound traffic	Turning locomotives closer to origin	Increasing communication with customers	Increasing communication with Class I's	Assisting Class I's with their capacity problems	Hiring additional personnel	Crew training	Purchasing additional locomotive power	Capital improvements	Not anticipating problems
<b>Belt Railway Company of Chicago</b>												
<b>Genesee &amp; Wyoming, Inc.</b>					Attending shipper and rail industry forums	Attending shipper and rail industry forums	Increasing traffic flow in some areas to mitigate					Not capacity constrained
<b>Indiana Harbor</b>												
<b>New Orleans Public Belt Railroad</b>								Hiring new switchmen to ensure dwell time of 15 to 17 hours				Upgrading Main Line to 115 pound welded rail; upgrading all Main Line turnouts; rehabbing main switching yards
<b>Omnitrax</b>												
<b>Pacific Harbor Line</b>	X				By establishing road locomotive service operation for BNSF on property			Hiring more intermodal switch crews in conjunction with BNSF and UP				Ports of Los Angeles and Long Beach extended the signaling
<b>RailAmerica</b>						Co-locating on-dock intermodal operations planning of PHL, BNSF and UP						

**South Carolina  
Public Railways**

Has excess capacity; has an excellent relationship with CSX and NS

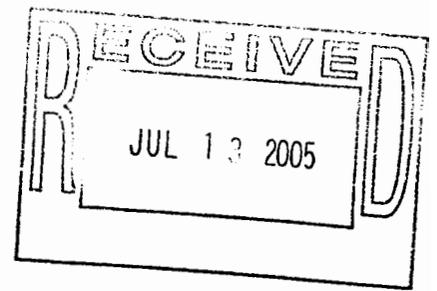
Daily conference calls; sending reports on dwell time, etc.; employee working full-time with freight customers; customer workshops with discussion of Tacoma Rail's plans for coming year and customers' freight forecasts	Daily conference calls; sending reports on dwell times, etc.; working to move interchange points; establishing joint partnership center with Port of Tacoma, UP and BNSF that will develop and execute train slot plans	X	ng daily field tests of all crews; developed operation rules compliance program to ensure efficiency and	X	Performing daily field tests of all crews; developed operation rules compliance program to ensure efficiency and safety
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**Tacoma Rail**

	Relocating to an isolated satellite yard for classification				TRRA Planning Committee is reviewing the physical plant, identifying opportunities to expand the infrastructure and to use capital dollars to solve capacity issues
<b>Terminal Railroad Association of St. Louis</b>	Eliminating re-humps, cars over 24 hours and trip-plan execution	. This allows for more efficient handling of intermediate traffic	Adjusts operations to ensure service requirements are met	Discusses areas of concern within the main corridors	

**Watco**

FYI



Mortimer B. Fuller, III  
Chairman and Chief Executive Officer

July 11, 2005

Richard F. Timmons  
President  
American Short Line and Regional Railroad Association  
50 F Street, N.W.  
Suite 7020  
Washington, D.C. 20001-1564

SUBJ: Fall Peak Service Demands and Infrastructure Improvements

Dear Mr. Timmons:

I was pleased that you afforded me the opportunity to respond on behalf of Genesee & Wyoming railroads to Chairman Nober's concerns regarding potential problems and related preparations by the nation's railroads for the upcoming Fall Peak. I think it's important that we identify potential problems and corresponding courses of action candidly to our shippers so that the transportation community can produce the best possible service outcome.

First, from a G&W perspective, the short line railroad industry is not capacity constrained at this time. In fact, we view the current railroad capacity issues as an opportunity to increase our menu of services offered to assist our Class I connections with this recurring problem. For example, we have offered to assume the transfer responsibility for the interchange of traffic between the Class I connections and our short line operations in Oregon, Utah, New York, Florida and elsewhere. We are working with Class I's to increase the flow of overhead traffic between Meridian, MS and Montgomery, AL in an effort to ease potential congestion in New Orleans, Memphis and Birmingham. I might add these are very positive, cooperative initiatives that will also help ease the strain on manpower and equipment in these regions.

As you may be aware, G&W railroads serve five port operations in the Southeast and four on the Gulf. We do not expect to experience rail service problems at any of these operations this fall. Having said that, we operate timber and forest products-dependent railroads in Oregon and Arkansas and serve over twenty large paper mill complexes across the country. We are concerned that any slowing in the velocity of the US rail

Richard F. Timmons  
July 11, 2005  
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network this fall will create spot equipment shortages, thus adversely impacting our ability to furnish suitable empty equipment to our many customers. For this reason, I think it is important the short line railroad industry differentiate its service problems from those of the Class I railroad during peak season, while continuing to emphasize our willingness and ability to be part of the solution.

Regarding Chairman Nober's rail - shipper communication concerns, G&W will continue to communicate with its customers and connections this fall to assist each in meeting the projected demand. We feel that the ability of short lines to reach out and personally touch on-line shippers is an effective communication tool. Also, as a member of the ASLRRRA and the AAR, we have sent representatives to many of the various shipper and rail industry forums that have taken place recently. We are involved in the planning of and will participate as needed, in the upcoming 2005 North American Railroad Customer Forum sponsored by AAR's NEMC and are represented on the Rail Shipper Transportation Advisory Council.

In summary, while I am concerned about potential spot equipment shortages this fall, I remain confident that the G&W railroads are prepared for the upcoming Fall Peak and each is willing to assist in handling this demand, as is appropriate.

Very truly yours,

A handwritten signature in black ink that reads "Mort Fuller". The signature is written in a cursive, slightly slanted style.

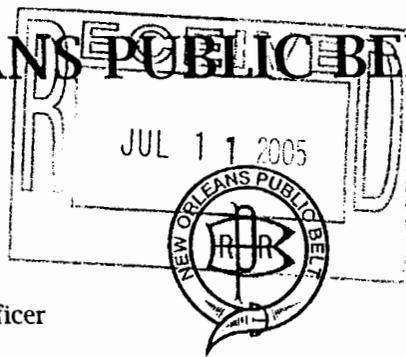
Mortimer B. Fuller, III

MBF:vmr/05104  
cc:James W. Benz

# NEW ORLEANS PUBLIC BELT RAILROAD

Jim Bridger  
General Manager  
896-7410

J. A. Morrow, Jr.  
Chief Financial & Mechanical Officer  
896-7430



T. F. Lobello, Jr.  
Chief Operating Officer  
896-7410

A. C. Marinello, Jr.  
Chief Engineer  
896-7420

June 29, 2005

Richard F. Timmons, President  
American Short Line and Regional Railroad Association  
501 F Street, N.W., Suite 7020  
Washington, D.C. 20001-1564

Dear Mr. Timmons:

The New Orleans Public Belt Railroad is unique in that we interchange daily with all six of the Class 1's. We are in constant communication with all of our Class 1 partners. We have three (3) conference calls a day at 0815, 1515 and 2315 to discuss our operating plan for the entire New Orleans gateway and what affects we will have on each other. We also have a monthly meeting with all of the local Superintendents. Here we also discuss our individual operations and any changes to our respective T-Plans that may affect how we are doing business with each other. The local guys also keep each other informed about any new business or any sudden influx of business or any diversions that may take place that would possibly alter our daily plans.

The New Orleans Public Belt maintains an average dwell of 13.17 hours on all traffic coming on and off our railroad. We handle approximately 18,000 cars a month. We have recently implemented new systems to ensure that this goal is met through 2005 and beyond.

As far as capital plans we are continuously upgrading our plant to accommodate the ever changing way we are made to do business. We are in the process of completing a three (3) year project of changing our main line (25 miles from 90 lb jointed rail to 115 lb welded rail). While this upgrade was in process we also changed all of the main line turnouts from no. 7's and no. 8's to all no. 9's with back saver switches and steel ties. We have also installed our new (2) main switching yards with all new rail and the new back saver switches as well.

I hope this will give you the information you wanted and if I can be of further assistance please don't hesitate to call me at 504-896-7410.

Tom Lobello  
Chief Operating Officer

4822 Tchoupitoulas Street  
(504) 896-7410

(800) 524-3421

New Orleans, Louisiana 70115-1645  
Fax (504) 896-7419



# PACIFIC HARBOR LINE

July 8, 2005

Mr. Richard Timmons  
President  
American Shortline and Regional Railroad Association  
50 F Street, NW, Suite 7020  
Washington DC 20001-1564

Dear Mr. Timmons:

The following will constitute Pacific Harbor Line's response to STB Chairman Nober's request for information relating to rail carrier preparedness for the 2005 peak season.

Pacific Harbor Line (PHL) serves the ports of Los Angeles and Long Beach, which together form the busiest port complex in North America. PHL operates exclusively on trackage that is owned by one port or the other or jointly owned. PHL provides basically two services. First, we provide the switching for all carload industries in the harbor. Second, we provide intermodal traffic switching to and from the marine terminals with on-dock rail yards.

PHL essentially performs its services as agents for BNSF Railway and Union Pacific Railroad. Thus, to a large extent our plans are but a component of those carriers' much larger and comprehensive plans.

Our customers are telling us that the carload business in the second half of 2005 is projected to be very similar to the second half of 2004. On that basis, we have sufficient crews and motive power to meet the demand. In 2004, we were plagued with an overaccumulation of received traffic which exceeded certain customers' ability to process. In 2005, by working with BNSF and UP to aggressively enforce demurrage and storage rules, we anticipate an improvement of this condition.

Our intermodal operations, which form the preponderance of our activity, responds to the specific requests by BNSF and UP for PHL-provided crews. Responding to previous requests, PHL increased the number of intermodal switch crews in the second half of 2004 and first half of 2005. BNSF and UP have advised us they do not anticipate increasing the compliment of PHL crews required for the balance of 2005. It should be pointed out that PHL crews are a supplement to and work in conjunction with BNSF and UP crews to meet the international intermodal demand.

Among the tasks now performed by PHL crews is to assemble and air test outbound trains with Class I road power, enabling UP and BNSF road crews to board a ready-to-depart train and leave with a minimum amount of time on duty, thus serving to reduce hours of service tie ups further down the line.

Besides the number of crews, a major PHL/BNSF/UP initiative in the first half of 2005 has to been to co-locate the on-dock intermodal operations planning of all three railroads into the PHL office building. Previously, that function for each railroad was conducted in separate locations. By co-locating, communication between all entities is enhanced, resulting in more efficient crew and infrastructure utilization and having the effect of increasing capacity.

340 Water Street • Wilmington, CA 90744  
Telephone (310) 834-4594 • Fax (310) 834-1342

BNSF, with the assistance of PHL, established a road locomotive servicing operation on PHL trackage on Terminal Island, which is the hub of on-dock intermodal operations for both ports. UP is in the process of implementing something similar. Establishing the ability to "turn" locomotives closer to the origin and destination yards improves locomotive utilization and decreases the number of light engine moves to and from other servicing facilities which has a positive impact on PHL line capacity.

With respect to capital improvements, neither PHL nor the Class I carriers control capital expenditures in the harbor. The owners, the Ports of Los Angeles and Long Beach, make the capital improvements. In the second half of 2005, the ports, acting through the Alameda Corridor Transportation Authority, will be extending Centralized Traffic Control (CTC) on PHL tracks an additional 3.2 miles. By extending the signaling, trains will be able to operate at higher speeds, thus increasing line capacity, as well as enable trains to transit certain highway grade crossings more quickly which has the added benefit of reducing port truck congestion and pollution.

Please let me know if you have any questions.

Very Truly Yours,

Andrew Fox  
President

340 Water Street • Wilmington, CA 90744  
Telephone (310) 834-4594 • Fax (310) 834-1342



## **SOUTH CAROLINA PUBLIC RAILWAYS**

**540 East Bay Street  
Charleston, South Carolina 29403  
(843) 727-2067 \* FAX (843) 727-2005**

June 30, 2005

Mr. Richard F. Timmons, President  
ASLRRA  
50 F Street, N.W.  
Suite 7020  
Washington, DC 20001-1564

Dear Rich:

In response to your letter of June 21, 2005, South Carolina Public Railways does not anticipate any problems in handling the fall and holiday peak period for rail shipments. We currently have excess capacity on all three of our operating companies and with minor changes this capacity could be easily expanded.

In regard to CSX and NS, our interchange connections in the Charleston area, sufficient capacity exists, with on-time train performance, to meet the expected fall and holiday peaks. Both carriers have experienced significant growth in the Charleston area and have made service adjustments to meet the increased demands. South Carolina Public Railways enjoys an excellent local working relationship with both carriers and adjusts operating plans to meet changing service requirements.

If you need additional information, please feel free to contact me.

Sincerely,

Daniel S. Green  
President

lgl



2601 SR 509 North Frontage Road  
Tacoma, Washington 98421

TACOMA PUBLIC UTILITIES

July 20, 2005

Mr. Richard F. Timmons, President  
American Short Line and Regional Railroad Association  
50 F Street  
Suite 7020  
Washington, D.C. 20001-1564

Dear Mr. Timmons,

I received your letter requesting information regarding Tacoma Rail's operating plan with the Port of Tacoma. Tacoma Rail has planned for and will continue to manage the unprecedented growth we are experiencing. The following are the components of our Planning for Peak (P4P) program.

**Planning for Peak:**

**Safety:**

- Perform daily field tests on all crews.
- Developed operation rules compliance program that ensures efficiency and safe movements of trains.

**Transportation:**

- Purchase additional locomotive power.
- Hire additional crew members.
- All partners participate in multiple daily conference calls regarding train arrivals and departures.

**Technology:**

- Tacoma Rail has created reports for all partners; i.e. dwell time, footage capacity and car location.
- Reports are sent automatically to all partners and customers.

**Customer Service:**

- Work with the mainline railroads to move the interchange points.
- Develop parameters for a joint partnership center with the Port of Tacoma, Union Pacific, Burlington Northern Railway and Tacoma Rail.
- Joint center will have the responsibility 24/7 to develop train slot plans and execute the plan.
- Tacoma Rail has assigned a full time employee to work with all freight customers.
- Inform all customers of their demurrage bills and car dwell times.

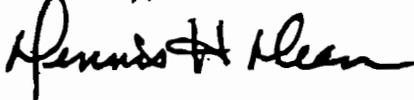
In addition to the above activities, Tacoma Rail's Planning for Peak program has been shared with our customer base during a series of workshops which are conducted each year. During these customer workshops Tacoma Rail outlines activities from the previous year and plans for the coming years. Each customer is provided an opportunity to communicate their issues and freight forecasts. These workshops are well attended and the exchange of information is invaluable.

Our largest customer, the Port of Tacoma, is our strongest partner. Both Tacoma Rail and the Port of Tacoma jointly plan the design and operating plans of the rail infrastructure. We jointly fund and participate in rail capacity studies.

Tacoma Rail and its rail partners/customers recognize the need to jointly address service and infrastructure demands in order to be poised for the future. The Pacific Northwest region has become and will continue to be a key player to the nation's railway system fluidity and performance.

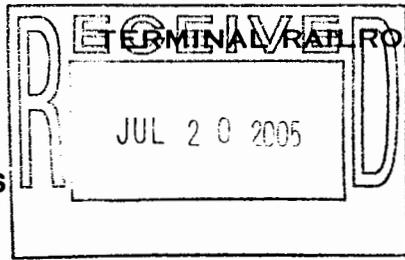
Thank you for the opportunity to share how Tacoma Rail has been planning for peak service and infrastructure demands. If you have any questions regarding our planning activities, you may reach me at 253-405-0765.

Yours truly,



Dennis H. Dean  
Superintendent

Cc: P Henry  
ASLRRRA file



TERMINAL RAILROAD ASSOCIATION OF ST. LOUIS

**BILL J. BROYLES**  
ACTING PRESIDENT



1000 ST. LOUIS UNION STATION, SUITE 200  
ST. LOUIS, MISSOURI 63103  
(314) 539-4704  
FAX: (314) 621-3673  
CELL: (618) 973-1483  
bbroyles@terminalrailroad.com

July 15, 2005

Mr. Richard F. Timmons, President  
American Short Line and  
Regional Railroad Association  
50 F Street, N. W., Ste. 7020  
Washington, D.C. 20001-1564

Dear Mr. Timmons:

In response to your letter of June 21, 2005, I offer the following:

Terminal Railroad Association of St. Louis handles traffic through the St. Louis Gateway and is owned by five Class I Railroads; Norfolk Southern Railway Company, Burlington Northern Santa Fe Railway Company, Canadian National, CSX Transportation, and Union Pacific Railroad. Fall peak is a big challenge for the TRRA as traffic volumes rise across the Midwest, especially in the absence of available capital funding to add to infrastructure needs.

In an effort to increase capacity and traffic flows during this period, the TRRA has identified and focused on several key areas in operations, planning and communications that work to attack the pitfalls of this heavy time frame. Following is a brief outline:

1. Hump Operation Efficiency Improvements
  - Elimination of re-humps
  - Cars over 24 hours
  - Trip-plan execution
2. Relocation of Industry Bound Traffic
  - During peak times, industry bound traffic is relocated to an isolated satellite yard for classification, this movement of local traffic off of the inbound and outbound leads of the hump operation allows for more efficient handling of intermediate traffic.
3. Weekly Meetings with Local Class I Operating Groups
  - Discussions held regarding areas of concern within the main corridors, i.e., heavy tonnage routes, choke points, time frames of opportunity, and splitting traffic directions to routes of lesser volume.

Mr. Richard E. Timmons  
July 15, 2005  
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4. Daily Communications with Local Industry Customers

- Working closely with local industry customers has given TRRA an advantage. Understanding their needs and concerns allows for internal adjustments in operations to ensure their service requirements are met.

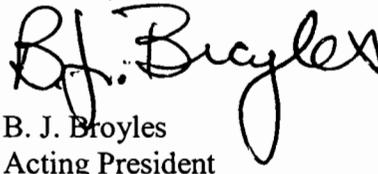
5. TRRA Planning Committee

- A review of TRRA's physical plant is currently underway, focusing on:
  - Opportunities for expansion to infrastructure.
  - Use of capital dollars for improvement to best solve capacity issues, not just short-term fixes.

In closing, the TRRA has worked diligently in the St. Louis area to prepare for and accommodate the heavy volumes during fall peak. The Class I Railroads have efficiently utilized the CTC in Chicago, Joint Dispatching facility in Kansas City, and the Operations Center in St. Louis to focus on heavy traffic volumes flowing smoothly through these gateways. The stronger and more efficient plans they have set in place are a defined improvement over the past couple of years in dealing with these traffic issues.

Please call my office at (314) 539-4708 if you have any questions.

Sincerely,



B. J. Broyles  
Acting President