

**BEFORE THE SURFACE TRANSPORTATION BOARD**

---

**Docket No. EP 711 (Sub-No. 1)  
RECIPROCAL SWITCHING**

---

**Comments Submitted by  
The Intermodal Association of North America (IANA)**

IANA is North America's leading multimodal transportation trade association representing the combined interests of the intermodal freight industry. IANA's membership roster of over 1,000 corporate members includes intermodal and over-the-road motor carriers, railroads (Class I, short-line and regional), water carriers, stacktrain operators, port authorities, intermodal marketing and logistics companies, and suppliers to the industry such as equipment manufacturers, intermodal leasing companies, and consulting firms. IANA's associate (non-voting) members include shippers (defined as the beneficial owners of the freight to be shipped), academic institutions, government entities, and non-profit associations.

IANA's mission is to promote the growth of efficient intermodal freight transportation through innovation, education, and dialogue. In furtherance of its mission, IANA administers the Uniform Intermodal Interchange and Facilities Access Agreement (an equipment interchange agreement adopted almost universally throughout the intermodal industry) and offers a wide variety of value-added business services and programs relating to operations, maintenance, risk management, safety, and security. These services are intended to promote intermodal productivity and operating efficiencies through the development and implementation of uniform industry processes and procedures governing the interchange of intermodal equipment (including shipping containers) among ocean carriers, railroads, and motor carriers.

Moving goods in the most efficient and cost-effective way is paramount and a shared goal of industry and policymakers. Over the course of the past two years especially, our members have navigated unanticipated challenges in moving goods on which U.S. businesses and consumers depend. An unprecedented confluence of events – including labor shortages, demand outpacing supply, and continued efforts to mitigate the spread of COVID-19 – continues to exert pressure on the people and companies that move cargo.

Therefore, I am writing to you today to encourage the Board to proceed methodically and with restraint as it contemplates a major market intervention in the form of "reciprocal switching" regulation.

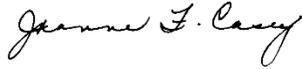
Historically, IANA has opposed policies that substantially change the current laws under which freight railroads operate – including widespread forced switching like the 2016 Notice of Proposed Rulemaking (NPRM) recommends. Absent a definitive showing of market failure and a conclusive cost-benefit analysis, the efforts contemplated under this proposed rule are unjustified.

We believe that the impact of forced switching to intermodal freight transportation would most likely be: a decline in rail infrastructure; decreased network velocity; a deterioration in domestic intermodal service; and an adverse impact on intermodal's ability to compete with over-the-road

trucking. These outcomes are troubling given the supply chain challenges that continue, both domestically and internationally.

We understand and appreciate the macro goals of the current administration, ranging from industrial decarbonization to supply chain resiliency. IANA continues to be a partner in identifying solutions to meet these and other challenges. But put simply, forced reciprocal switching only stands to weaken progress in those and other areas.

Respectfully submitted,

A handwritten signature in cursive script that reads "Joanne F. Casey".

Joanne F. Casey  
President & CEO

Intermodal Association of North America  
11785 Beltsville Drive  
Suite 1100  
Calverton, Maryland 20705  
(301) 982-3400 ext. 349

February 10, 2022