

INTERNATIONAL PORT OF MEMPHIS

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Executive Director

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OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

December 13, 2011

Ms. Karen V. Gregory
Secretary
Federal Maritime Commission
800 North Capitol Street, NW
Washington, DC 20573-0001

RE: Docket No. 11-19, U.S. Containerized Cargo Flows – Response to NOI

Dear Madam Secretary:

The Port of Memphis is writing in response to the recent posting in the Federal Register concerning a notice of inquiry. The notice requests inquiries on factors that may cause or contribute to the shift of cargo destined for the U.S. inland from U.S. to Canadian and Mexican seaports.

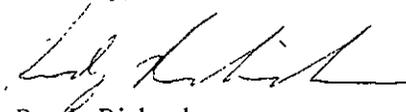
The Port of Memphis is the 4th largest inland Port in the United States. The Memphis MSA has five Class I rail carriers; 2 from the east coast, Norfolk Southern and CSX, 2 from the west coast, Burlington Northern Santa Fe and Union Pacific and 1 going north-south, the Canadian National. These five railroads have invested approximately 1 billion dollars in expanding container yard infrastructure in the Memphis MSA in the last 10 years.

I have examined the issue background information including the request letters from the west coast senators and congressmen. I would also request that the study not be limited to the Harbor Maintenance Tax as it relates to the shift in container traffic. The study should include traditional comparable expenses such as labor, environmental regulations, technology utilization, infrastructure costs, market access and delivery speed/reliability.

Canada is the number 1 trading partner of the United States and freight from Canada is a very important part of the growth of Memphis as an inland intermodal hub. Therefore, the Port of Memphis requests that the Federal Maritime Commission investigate all potential factors contributing to a shift in trade and carefully consider the ramifications of future actions on all parts of the country, not just the west coast.

Thank you for the opportunity to comment on this issue. Please include this letter in the public docket for this proceeding.

Sincerely,



Randy Richardson
Executive Director

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