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October 27, 2020

Canadian Transportation Agency
15 rue Eddy
Gatineau, QB K1A 0N9

Via email: ferroviaire-rail@otc-cta.gc.ca

RE: Canadian Transportation Agency Consultation regarding Regulated Interswitching: Proposed Changes to Rate-Setting and Billing.

The Saskatchewan Mining Association (SMA) is the voice of the mining industry in Saskatchewan and has the role of liaison and consultant with government and public to advance a safe, sustainable, and globally competitive mining industry in Saskatchewan. Our members produce over 30% of the world's supply of potash and are high volume shippers on Canada's Class 1 railways. Shipping rates are a significant cost to our members, so we appreciate the opportunity to provide comments on these proposed changes to interswitching rates. As price takers on global markets, any price increase decreases our global competitiveness.

We support the comments that Fertilizer Canada provided to you in their October 14, 2020 submission including:

Proposal 1: One Zone and Rate

SMA members currently do not support this proposed change, which has not been asked for by shippers.

Proposal 2: New Block Car Category

SMA members support the creation of a new block category for 100+ cars with reduced rates that reflect the cost efficiency of moving larger blocks. If the data supports it, a revision of the new block category starting at 90+ cars, rather than the proposed +100 cars is recommended.

Proposal 3: A Clear, Accurate Definition of "Car"

SMA members have no comment on the new proposed definition of "car".

Proposal 4: More Transparent Billing

SMA members support increased transparency on shipping rates, including specifying the interswitching rate separated from line items on the invoice. This will help shippers ensure the accuracy of the billing.

Sincerely,

A handwritten signature in black ink that reads "P. Schwann".

Pam Schwann, MSc. P. Geo.
President

cc. Daniel Kelter, Fertilizer Canada
SMA Infrastructure Committee Members

