

May 6, 2008

Ms. Helena Borges, Director General, Surface Transportation Policy (ACG), 27<sup>th</sup> Floor, Tower C, Place de Ville 330 Sparks Street, Ottawa, Ontario K1A 0N5

Dear Ms. Borges:

RE: Response to Terms of Reference of Transport Canada Rail Freight Service Review

The Halifax Chamber of Commerce makes the following recommendations to the terms of reference for the rail freight service review:

- 1) Concerning the proposed shippers' survey and any future information-gathering exercises, absolute confidentiality must be assured and delivered. Some shippers may not wish to render candid opinions if confidentiality cannot be ensured.
- 2) As it is expressed, the document now relates only to rail service. Since a relationship exists between rail service and pricing, the terms of reference should be expanded to include matters of rail service pricing.
- 3) Because this rail freight review is a national exercise, all attempts should be made to ensure that a cross-section of regional interests is heard. Keeping that in mind, there is a definite need to ensure that the opinions of Atlantic shippers are sought and well-considered, along with those of their counterparts in other regions.
- 4) Concerning Phase 2: The Recommendations Stage, there should be Atlantic Canadian representation on the three-person eminent persons panel. The Chamber could put forward names of such eminent persons, if such names were required.
- 5) The review objectives seem to be addressed only to Canadian shippers and customers. Since a great deal of rail business in Canada involves international shipping, we recommend that international and intermodal rail shipping should necessarily be considered in the terms of reference.
- 6) Even though not directly involved in rail transport, non-shipping companies and different levels of government (including municipal, provincial and territorial governments) are also affected by the process. Because of this, they are stakeholders and their views should be sought and considered in the review.

In addition, the Halifax Chamber of Commerce's Transportation Committee recently drafted a policy statement recommending that the federal government embark on developing a new National Transportation Strategy. It is our hope that processes such as the rail freight service review would form part of a newly minted national strategy for transportation. For your consideration, we have attached our policy statement.

Finally, the Halifax Chamber of Commerce offers to assist the proposed rail freight review by acting as a facilitator to help review officials in the information-gathering process. Services offered could range from assembling a list of local shippers and stakeholders to hosting a meeting between review officials and interested stakeholders in the Halifax area.

Any further questions or inquiries can be directed to me or Nancy Conrad, Senior Vice-President Policy, Halifax Chamber of Commerce. e-mail: nancyc@halifaxchamber.com Phone: (902) 481-1231.

We are pleased to offer this input and we welcome the opportunity to provide comment and feedback on the draft recommendations when they become available.

Sincerely,

Valerie A. Payn President & CEO

The Halifax Chamber of Commerce is a best practice business organization that continuously strives to make Halifax an even more attractive location in which to live, work and play. The 1700 Chamber Members employ approximately 75,000 people in Halifax - over one quarter of Metro-Halifax's labour force. It is the first North American Chamber to be certified to the ISO 9001:2000 International Standard of Quality, and it is the oldest Chamber on the continent, with roots dating to 1750.

The Transportation Committee of the Halifax Chamber of Commerce consists of stakeholders from all facets of the local transportation sector. This volunteer committee is mandated to monitor transport policy that affects the region and the business environment for members of the Halifax Chamber of Commerce.