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U.S. Department of Justice
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To: John Roberts

From: Roger Clegg

Per my conversation today with your charming secretary.

file -
Conrail

U.S. Department of Justice

Antitrust Division

Office of the Assistant Attorney General

Washington, D.C. 20530

January 29, 1985

Honorable Elizabeth H. Dole
Secretary
Department of Transportation
Washington, D.C. 20590

Dear Secretary Dole:

This letter sets forth the Department of Justice's analysis of the competitive implications of a proposed sale of Consolidated Rail Corporation ("Conrail") to Norfolk Southern Corporation ("Norfolk Southern"), as you requested on September 11, 1984. As explained below, on the basis of our independent investigation, we have concluded that, without appropriate divestitures, the proposed merger would violate both Clayton Act and Interstate Commerce Act merger review standards. The merger would have a significant adverse effect on competition for the transport of commodities to and from a number of locations in several states, with the greatest adverse effect occurring at locations along an east-west rail corridor running between Buffalo and Pittsburgh in the east and St. Louis and Chicago in the west. The merger would likely enable the merged entity to achieve certain efficiencies. These efficiencies do not appear, however, to be sufficiently great to offset all of the competitive effects in all of the affected markets.

The Department of Justice therefore would oppose the proposed merger unless its competitive problems are remedied through a prior or concurrent divestiture of assets 1/ that is approved by the Attorney General. Appropriate divestiture must include divestiture of Conrail and/or Norfolk Southern rail assets along the designated corridor to one or more independent acquirers, other than CSX or any entity owned or controlled by CSX, that would provide long-term, viable, and competitive rail service to locations along the corridor. Such divestiture would preserve the vast bulk of the competition that would

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1/ "Divestiture" means the conveyance or other transfer by sale, lease, or otherwise of rail tracks and facilities or the right to use rail tracks and facilities.

have been eliminated by the merger. While there may be some possible anticompetitive consequences remaining in some isolated markets after the divestiture, these anticompetitive consequences are likely to be insignificant relative to the merger's expected efficiencies. This precondition to approval of the merger has been set forth in language agreed to by the Departments of Justice and Transportation (attached to this letter as Appendix A) which is to be included in the Agreement of Sale between Norfolk Southern and the Department of Transportation.

Our analysis is explained in detail below.

I. Competitive Analysis

A. Analytical Approach

Although mergers play a beneficial role in our economy, they sometimes may harm competition by creating, enhancing, or facilitating the exercise of "market power." "Market power" is the power of a firm or firms to raise the price of a product or service in a specific market above a competitive level for a significant period of time without fear that existing competitors or new entrants will make such a price increase unprofitable by expanding their output or charging a lower price. When only a few firms in a market into which entry is difficult account for most of the sales of a product, they may either explicitly or implicitly coordinate their actions to eliminate rivalry on price and non-price variables. When firms exercise market power in this way, the result is a transfer of wealth from buyers to sellers and a misallocation of resources that harms the economy. Therefore, a merger that would eliminate a significant competitor in an already highly concentrated market into which entry is difficult may enhance the ability of the remaining firms to exercise market power. Such a merger normally would be challenged by the Department under Section 7 of the Clayton Act unless other economic factors or some appropriate divestiture indicate that the merger should be permitted. 2/

2/ See, U.S. Department of Justice, Merger Guidelines, June 14, 1984. The standards used by the Department to analyze mergers under the Clayton Act are substantially the same as those used by the Interstate Commerce Commission, which is directed by statute to approve only transactions that are "consistent with the public interest." 49 U.S.C. § 11344. In applying this standard, the Commission disapproves transactions that would "substantially reduce the transport alternatives available to shippers unless there are substantial and demonstrable benefits to the transaction that cannot be achieved in a less anticompetitive fashion." General Policy Statement for Merger on Control of at Least Two Class I Railroads, 49 C.F.R. § 11801(a).

We analyzed this proposed merger according to the same standards and principles that we apply to mergers generally. As with any merger, our first step was to identify economically relevant markets--product-location combinations which could be subject to the exercise of market power--in which both Conrail and Norfolk Southern operate. Our next step was to identify "problem" markets (i.e., product-location combinations) with respect to which the merger would result in significantly high post-merger concentration and where entry by new firms (for example, trucking companies) would be difficult or unlikely in response to the exercise of market power following the merger. Once we identified the markets in which the merger would likely have a significant anticompetitive effect, we then considered whether these anticompetitive effects might be offset by efficiencies resulting from the merger. Finally, we considered what would be required to resolve any competitive problems that might be raised by the merger--that is, to prevent a reduction in the number of competing rail alternatives in highly concentrated markets where considerable revenues are involved and where the merger would otherwise be likely significantly to diminish competition.

B. Methodology

We defined two types of economically relevant markets for the purpose of analyzing this proposed merger--
(1) transportation of a commodity to a location ("destination markets") and (2) transportation of a commodity from a location ("origin markets"). 3/ In addition to railroads, non-rail

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3/ We identified commodity and location combinations using the five-digit Standard Transportation Commodity Codes ("STCCs") and four-digit Standard Point Location Codes ("SPLCs"), respectively, designated in the 1983 ICC 1% Waybill Sample. Five-digit STCCs were used because, for the most part, the products in a single five-digit group are close substitutes for one another and have similar transportation characteristics. A four-digit SPLC is in most cases a county, although, in a significant number of cases, a single county may contain two or more four-digit SPLCs.

Usually, the relevant geographic market will be as small as a county. However, even if in some cases the market may be broader, the competitive analysis would be the same because in markets located along the east-west corridor towards which our proposed remedy is directed, there are at most four competing railroads before the merger. In addition, where we knew with some certainty that the market was broader than a county, we incorporated this into our analysis. For example, we analyzed separately outbound shipments of corn, wheat, and soybeans, as well as the movement by rail of coal to utility plants. Producers of these commodities tend to be able to select among transportation alternatives that extend beyond county lines through the use of a combination of rail and nonrail movements.

transportation modes, such as truck and barge, were considered to be in the market to the extent they appeared to be close substitutes for rail transportation.

To identify those markets in which the merger might have a significant adverse effect (i.e., would result in high post-merger concentration and would significantly increase pre-merger concentration), we first identified markets (product-location combinations) where in 1983 Conrail and Norfolk Southern each participated (independently of one another) in at least 10 percent of the rail movements and where together the two railroads accounted for at least 50 percent of all rail movements in the market. 4/ Using 1977 Census of Transportation data, supplemented by surveys and interviews with over 200 shippers concerning approximately 700 facilities, we then eliminated those markets where non-rail competition appeared to be significant. Finally, we employed a number of other screens designed to eliminate from further consideration those markets in which over a significant portion of the route into the destination or out of the origin market in question, a single carrier other than Conrail or Norfolk Southern provides rail service, in which the total revenues affected were small, or in which the major shipper in the market supported the merger.

Using this screening procedure, we identified more than one hundred markets located in 39 counties in 21 states in which it appeared that a merger between Conrail and Norfolk Southern could have a significant anticompetitive effect. With respect to these markets, Conrail and Norfolk Southern participated in movements involving $516.1 million in rail revenues in 1983. Of the 39 counties, 15 had "problem" markets in which Conrail or Norfolk Southern participated in movements involving less than $5 million of revenues. If these 15 counties had been the only locations potentially affected by the merger, we would not oppose the merger, given the likely efficiencies that would

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4/ Although in some of the markets shippers can now be served only via the tracks of either Conrail or Norfolk Southern, but not both, many of these shippers nevertheless consider other carriers identified on the Waybill to be competitive alternatives because of "reasonable" reciprocal switching arrangements currently in place. One factor that probably keeps the switching rates of Norfolk Southern and Conrail low enough to allow competition in these markets is the fact that the two carriers rely on each other for switches into different markets and each might feel constrained from unilaterally exercising its full market power (by raising the switching rates at locations it alone controls) for fear that the other railroad would retaliate in other locations. Thus, even where shippers can be reached only by the tracks of Conrail or Norfolk Southern, the merger may eliminate competition that resulted from reciprocal switching.

result from the merger and given the fact that the commerce affected as to these 15 counties is so small compared to the actual overall volume of commerce involved in the merger. Even after eliminating these counties, however, a number of others remain and the potentially affected revenues in these counties are substantial enough to be of significant concern. The remaining counties include, among others, Wayne and Washtenaw counties in Michigan; Allen and Marion counties in Indiana; Erie county in New York; and Cuyahoga, Jefferson, Lucas, Stark, and Lorain counties in Ohio, as well as several counties in the southern United States that originate shipments of pulp, paper, and fiberboard products destined for locations served by Norfolk Southern and/or Conrail in the Midwest and Northeast. 5/ In two of these counties, Jefferson county in Ohio and Allen county in Indiana, our concern is particularly acute because the number of competing railroads would be reduced from two to one. In the other counties, the competitive situation would not be much better, because the number of rail alternatives would be reduced either from three to two or from four to three. We have determined that, although they are used by shippers to some limited extent, non-rail transport alternatives are inadequate substitutes for rail transport in these markets.

We also considered the argument that following the merger, the combined entity would divert so much interchange traffic from regional railroads in the northeast and midwest that some of these railroads would be unable to compete effectively in the markets they currently serve and that the resulting loss of competition would reduce consumer welfare. We find, however, that, as a general matter, it is extremely difficult to estimate the size of future diversions. 6/ It may be even more difficult to determine whether such diversions would be so substantial as to render otherwise viable regional railroads incapable of providing competition in markets where they currently operate and where their exit would reduce competition significantly. Because diversions often result from lower costs to railroads of providing single-line, rather than interline, service and because single-line service is often attractive to shippers, any potential harm in markets currently served by regional carriers

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5/ A complete listing of the product-location combinations identified through our screening methodology is attached to this letter as Appendix B. This listing is limited to counties in which in 1983 the potential problems identified involved Norfolk Southern's and Conrail's participation in rail revenues exceeding $2 million.

6/ While we have received diversion estimates from a number of sources, including the Department of Transportation, Norfolk Southern, Conrail, and some regional carriers, these estimates vary considerably and it is very difficult to draw firm conclusions from them.

must be weighed against possibly substantial benefits. Hence, even if we knew with certainty that such diversions would significantly impair the operations, or even the viability, of regional railroads, this would not demonstrate that the diversions are, on balance, harmful to the economy. To the extent that they may be harmful, however, the divestiture that we have proposed in Section II of this letter would address that problem by ensuring that there will be an opportunity for regional carriers to continue receiving interline traffic from independent carriers other than Norfolk Southern or Conrail.

C. Efficiencies

The primary benefit of mergers to the economy is their efficiency-enhancing potential, *e.g.*, their ability to lower overall production costs to the benefit of society. Some mergers that would significantly increase concentration in a market nevertheless result in significant real efficiencies. Therefore, if the parties to a merger establish by clear and convincing evidence that a merger will achieve such efficiencies, the Department considers those efficiencies in evaluating the merger.

As stated in the Department's Merger Guidelines, 7/ cognizable efficiencies include, but are not limited to, economies of scale, better integration of operating facilities, and similar efficiencies relating to specific operations of the merging firms. The Department also considers claimed efficiencies resulting from reductions in general administrative and overhead expenses, and other efficiencies that otherwise do not relate to specific operations of the merging firms, although, as a practical matter, those types of efficiencies are more difficult to demonstrate and to quantify. The Department does not give weight to claimed efficiencies if comparable savings reasonably could be achieved by the parties through means short of a merger likely to reduce competition.

We have reviewed efficiency claims made by Norfolk Southern. We believe that some of these claims are overstated, 8/ while others, such as abandonment of unprofitable track, would probably occur even in the absence of a merger. Nevertheless, we believe, based in part on interviews with affected shippers, that substantial benefits are likely to

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7/ U.S. Department of Justice, Merger Guidelines, June 14, 1984, at Section 3.5.

8/ For example, Norfolk Southern's estimated annual savings of $139 million due to the elimination of redundant personnel and facilities is highly speculative given the unpredictable results of union labor negotiations.

result from increased single-line service, an option that is in many cases both less costly to railroads and more desirable to shippers.

On balance, we have concluded that the possible benefits of the proposed merger are not sufficiently great to outweigh the very serious anticompetitive effect the merger would have, particularly in the designated east-west corridor. The potential efficiency gains--particularly relating to the offering of single-line service--are, however, likely to be sufficiently great to offset the less significant adverse competitive effects that would remain after the divestiture outlined in Section II of this letter is effected.

II. Proposed Remedy

As discussed above, although the proposed merger would have an anticompetitive effect in a number of markets, the markets of primary concern are located along a rail corridor bounded on the east by Buffalo and Pittsburgh and on the west by Chicago and St. Louis. Accordingly, we believe that a sale of Conrail to Norfolk Southern must be expressly conditioned on the prior or concurrent divestiture 9/ of rail assets to an independent entity or entities capable of providing long-term, viable, and competitive rail service along this corridor. For these purposes, "divestiture" means the conveyance or other transfer by sale, lease, or otherwise, of rail tracks and facilities or the right to use rail tracks and facilities.

To ensure competitive service, the divestiture must satisfy three conditions. First, the acquirer or acquirers (hereinafter "acquirer") must demonstrate to the satisfaction of the Attorney General that it possesses the managerial, operational, and financial capability necessary to compete effectively, and to remain a viable entity providing long-term rail service along the designated corridor.

Second, the divestiture should provide the acquirer direct connections in Buffalo, Chicago, Toledo, and East St. Louis to one or more railroads other than the the merged carrier or CSX Corporation or any railroad controlled by either of them. This condition is essential to the competitive viability of an alternative rail line because traffic to and from the affected markets moves not only on Conrail and Norfolk Southern lines, but also, to a significant extent, off those lines to or from

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9/ Concurrent divestiture may involve a transaction such as a contract between Norfolk Southern and a purchaser to transfer assets acquired from Conrail. Such a contract could become effective as at the closing of the sale of Conrail to Norfolk Southern.

connections with other railroads in Buffalo, Chicago, Toledo, and East St. Louis. Therefore, an independent connection to other railroads at each of these gateways would have to be available so as to remove the acquirer's need to rely upon the merged carrier or CSX to make these connections. 10/

Third, following the divestiture, in each of the designated counties in the east-west corridor, the merged Norfolk Southern/Conrail entity must switch cars between its tracks and facilities and the tracks and facilities of any shipper served by Norfolk Southern, Conrail, or Norfolk Southern/Conrail on customary terms and conditions whenever switching is practicable and necessary in order to provide a shipper with effective competitive access to the track and facilities of the acquirer.

The specific rail tracks and facilities to be divested and the consideration to be paid should be determined by agreement between the parties to the divestiture so that the market, rather than the Department of Justice, can determine the most suitable divestiture alternative. Because the divestiture would be subject to the Attorney General's approval, however, to assist him in evaluating the divestiture the Department of Justice should be supplied with complete information concerning all offers and inquiries received in connection with the divestiture, including those that are rejected by either the Department of Transportation or Norfolk Southern. 11/

This proposed divestiture addresses the vast majority of the larger "problem" markets we identified. While several markets are not affected by the proposal, these markets are either located in areas where a divestiture would be impractical or are locations where the amount of commerce shared by Conrail and Norfolk Southern was less than $5 million. When an independent rail alternative able to maintain competition within the designated corridor is found, such divestiture would resolve at least $371.4 million of potential problems out of a total of $516.1 million in the markets we have identified. In addition, this remedy would benefit some shippers, such as pulp, paper, and fiberboard producers located in 11 "problem" counties in the South, whose goods pass through or terminate in this corridor.

10/ The Toledo gateway would give shippers in Wayne and Washtenaw counties in Michigan access to a railroad other than Norfolk Southern/Conrail and CSX that provides a direct link to eastern and western destinations via Buffalo, Chicago, and East St. Louis.

11/ These terms and conditions are set forth in Appendix A and, we understand, will be included in the Agreement of Sale between the Department of Transportation and Norfolk Southern.

Finally, as discussed above, we have determined that the efficiencies that are likely to result from the proposed merger would be substantial enough to offset the potential anticompetitive effect in markets that are not directly addressed by the proposed divestiture.

III. Conclusion

I trust that this letter is responsive to your request for the Department's advice concerning the competitive impact of a sale of Conrail to Norfolk Southern. I would like to thank you and your staff for the competent and willing assistance that has been provided to us throughout our review process.

Sincerely,

J. Paul McGrath /R.G.

J. Paul McGrath
Assistant Attorney General
Antitrust Division

Attachment A

"Divestiture" means the conveyance or other transfer by sale, lease, or otherwise of rail tracks and facilities owned or operated by CR or NS or the right to use such rail tracks and facilities.

"NS" means Norfolk Southern Corporation, its subsidiaries, affiliates, successors and assigns.

"CR" means Consolidated Rail Corporation, its subsidiaries and affiliates.

"CSX" means CSX Corporation, its subsidiaries, affiliates, successors and assigns.

1. This Agreement of Sale is contingent upon prior or concurrent Divestiture sufficient to enable an acquirer or acquirers ("acquirer(s)"), not controlled as control is defined in 49 U.S.C. §10102 by NS/CR or CSX, to provide rail service along a rail corridor bounded on the West by Chicago and E.St. Louis and on the East by Buffalo and Pittsburgh, with service to, from, and between the following counties in that rail corridor: Erie, New York; Cuyahoga, Lorain, Jefferson, Lucas, and Stark, Ohio; and Allen and Marion, Indiana. Subject to the requirements of paragraph (5) with respect to Marion County, Indiana, such rail service may be limited to service along those sold or leased rail lines where prior to divestiture shippers had service by both NS and CR. Such rail service shall include direct connections in Buffalo, E.St. Louis, Toledo and Chicago to a railroad or railroads not controlled by NS/CR or CSX as control is defined in 49 U.S.C. §10102.

2. The rail tracks, rights and facilities divested pursuant to paragraph (1) and the consideration paid therefor shall be determined by agreement between NS and the acquirer(s).

3. The Divestiture required by paragraph (1) shall be made to acquirer(s) who shall have demonstrated to the Department of Justice that they will be able to provide long-term, viable, competitive rail service along the rail corridor(s) and to, from and between the counties enumerated in paragraph (1), as indicated by their having managerial, operational, and financial capability necessary to compete effectively in the provision of such rail service. The Divestiture required by paragraph (1) may not be accomplished without the prior approval by the Attorney General of its terms and conditions and of the acquirer(s).

4. Following the execution of this Agreement of Sale, NS shall promptly solicit offers to purchase, lease, or operate upon property to be divested in accordance with paragraph (1). NS shall keep records of its efforts to accomplish the Divestiture required by paragraph (1), including the identification of any person or persons expressing an interest to any officer or official of NS, and the terms and conditions of each offer, and shall allow the Department of Justice access to such records. NS shall immediately notify the Department of Justice of the details of any offer related to the Divestiture required by paragraph (1). If NS rejects any such offer, it shall promptly notify the Department of Justice and fully describe the reasons for such rejection.

5. It is further agreed that following Divestiture NS, CR, or NS/CR shall switch cars, on terms and conditions customary at other locations within the region of the Divestiture, between the tracks and facilities of the acquirer(s) and the tracks and facilities of any shipper physically served by NS, CR, or NS/CR and open to service by both as of the date hereof, at each of the counties specified in paragraph (1) whenever such switching is practicable and necessary in order to provide a shipper with effective competitive access to the tracks and facilities of the acquirer(s). Following Divestiture, in Marion County, Indiana, NS, CR or NS/CR shall establish switching charges at levels no higher than those customarily charged at other locations within the region of the Divestiture for switching cars between the tracks and facilities of the acquirer(s) and the tracks and facilities of any shipper served by NS, CR or NS/CR as of the date hereof. If there is a dispute as to whether such switching is practicable and necessary, or as to such customary conditions and compensation for such switching, such dispute shall be resolved within six months by an arbitration procedure governed by the rules of the American Arbitration Association. In respect of such requirements for practicable and necessary switching of cars, the acquirer(s) and the directly affected shipper(s) shall be entitled to enforce this paragraph, in each such instance, for their sole benefit.

Attachment B

MARKETS IN COUNTIES WITH REVENUE PROBLEMS OF $2 MILLION OR MORE

--- ST=AL ---

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	4759	DALLAS	26111	PULP
ORIG	4783	WILCOX	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD

--- ST=AR ---

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	6118	JEFFER	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD

--- ST=FL ---

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	4936	TAYLOR	26111	PULP

--- ST=GA ---

	SPLC	COUNTY	STCC5	PRODUCT
DEST	4685	DOUGHE	26111	PULP
ORIG	4655	GLYNN	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD
ORIG	4637	MACON	26111	PULP

--- ST=IL ---

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	3877	CHAMPA	20921	SOYBEAN OIL,CRUDE OR REFINED
ORIG	3922	MACON	20419	FLOUR OR OTHER GRAIN MILL PRODUCTS,NE
ORIG	3922	MACON	20463	CORN SUGAR
DEST	3876	VERMIL	28712	SUPERPHOSPHATE
DEST	3876	VERMIL	40211	IRON OR STEEL SCRAP,WASTES OR TAILING
ORIG	3876	VERMIL	20413	CORN MEAL OR FLOUR
ORIG	3876	VERMIL	20419	FLOUR OR OTHER GRAIN MILL PRODUCTS,NE
ORIG	3876	VERMIL	20923	SOYBEAN CAKE,FLOUR,GRITS,MEAL OR OTHE

--- ST=IN ---

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	3642	ADAMS	20923	SOYBEAN CAKE,FLOUR,GRITS,MEAL OR OTHE

ST=IN

	SPLC	COUNTY	STCC5	PRODUCT
DEST	3618	ALLEN	11212	PREPARED BITUMINOUS COAL
DEST	3618	ALLEN	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD
DEST	3618	ALLEN	26471	SANITARY TISSUES OR HEALTH PRODUCTS
DEST	3618	ALLEN	40211	IRON OR STEEL SCRAP,WASTES OR TAILING
DEST	3618	ALLEN	41114	ARTICLES, USED
ORIG	3618	ALLEN	37149	MOTOR VEHICLE ACCESSORIES OR PARTS,NE
ORIG	3618	ALLEN	40211	IRON OR STEEL SCRAP,WASTES OR TAILING
ORIG	3682	CLINTO	20923	SOYBEAN CAKE,FLOUR,GRITS,MEAL OR OTHE
DEST	3687	MARION	11212	PREPARED BITUMINOUS COAL
ORIG	3687	MARION	20411	WHEAT FLOUR
ORIG	3687	MARION	20413	CORN MEAL OR FLOUR
ORIG	3687	MARION	20462	CORN STARCH
ORIG	3687	MARION	20923	SOYBEAN CAKE,FLOUR,GRITS,MEAL OR OTHE
ORIG	3623	ST JOS	37112	MOTOR TRUCKS OR TRUCK TRACTORS,ASSEMB

ST=KY

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	2865	JEFFER	28212	SYNTHETIC RUBBERS
ORIG	2865	JEFFER	36321	HOUSEHOLD REFRIGERATORS OR HOME OR FA

ST=LA

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	6451	ASCENS	49057	FLAMMABLE COMPRESSED GASES
ORIG	6451	ASCENS	49066	FLAMMABLE LIQUIDS, THERMALLY UNSTABLE

ST=MA

	SPLC	COUNTY	STCC5	PRODUCT
DEST	1482	HAMPDE	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD

ST=MI

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	3167	INGHAM	37149	MOTOR VEHICLE ACCESSORIES OR PARTS,NE
DEST	3193	KALAMA	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD
DEST	3193	KALAMA	33123	IRON OR STEEL SHEET OR STRIP
ORIG	3194	WASHTE	37149	MOTOR VEHICLE ACCESSORIES OR PARTS,NE

---------- ST=MI ----------

	SPLC	COUNTY	STCC5	PRODUCT
DEST	3181	WAYNE	20841	WINE,BRANDY OR BRANDY SPIRITS OR FRUI
DEST	3181	WAYNE	26213	PRINTING PAPER,COATED OR UNCOATED,
DEST	3181	WAYNE	37149	MOTOR VEHICLE ACCESSORIES OR PARTS,NE
DEST	3181	WAYNE	41114	ARTICLES, USED
ORIG	3181	WAYNE	37111	MOTOR PASSENGER OR AIR CARS,ASSEMBLED
ORIG	3181	WAYNE	37149	MOTOR VEHICLE ACCESSORIES OR PARTS,NE
ORIG	3181	WAYNE	41114	ARTICLES, USED
DEST	3183	WAYNE	41114	ARTICLES, USED
ORIG	3183	WAYNE	37111	MOTOR PASSENGER OR AIR CARS,ASSEMBLED
ORIG	3183	WAYNE	37112	MOTOR TRUCKS OR TRUCK TRACTORS,ASSEMB
ORIG	3183	WAYNE	37142	MOTOR VEHICLE ACCESSORIES
ORIG	3183	WAYNE	37147	MOTOR VEHICLE BODY PARTS
ORIG	3183	WAYNE	41114	ARTICLES, USED

---------- ST=MO ----------

	SPLC	COUNTY	STCC5	PRODUCT
DEST	5675	ST LOU	33125	STRUCTURAL SHAPES OR PILING,STEEL MIL
DEST	5675	ST LOU	37149	MOTOR VEHICLE ACCESSORIES OR PARTS,NE
ORIG	5675	ST LOU	37149	MOTOR VEHICLE ACCESSORIES OR PARTS,NE

---------- ST=MS ----------

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	4893	ADAMS	26111	PULP

---------- ST=NC ----------

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	4033	WASHIN	24211	LUMBER,ROUGH OR DRESSED,OR SOFTWOOD C
ORIG	4033	WASHIN	26213	PRINTING PAPER,COATED OR UNCOATED,
ORIG	4033	WASHIN	26311	FIBERBOARD, PAPERBOARD OR PEGBOARD

---------- ST=NY ----------

	SPLC	COUNTY	STCC5	PRODUCT
DEST	1854	ERIE	1195	POTATOES, OTHER THAN SWEET
DEST	1854	ERIE	20411	WHEAT FLOUR
DEST	1854	ERIE	20452	PREPARED FLOUR MIXES
DEST	1854	ERIE	20995	MIXED LOADS OF FOOD OR KINDRED PRODUC
DEST	1854	ERIE	24321	PLYWOOD OR VENEER OR BUILT-UP WOOD
DEST	1854	ERIE	26311	FIBERBOARD, PAPERBOARD OR PEGBOARD
ORIG	1854	ERIE	33123	IRON OR STEEL SHEET OR STRIP
ORIG	1854	ERIE	37149	MOTOR VEHICLE ACCESSORIES OR PARTS,NE

----------------------------------- ST=OH -----------------------------------

	SPLC	COUNTY	STCC5	PRODUCT
DEST	3418	CUYAHO	11212	PREPARED BITUMINOUS COAL
DEST	3418	CUYAHO	24321	PLYWOOD OR VENEER OR BUILT-UP WOOD
DEST	3418	CUYAHO	26213	PRINTING PAPER,COATED OR UNCOATED,
DEST	3418	CUYAHO	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD
DEST	3418	CUYAHO	26471	SANITARY TISSUES OR HEALTH PRODUCTS
DEST	3418	CUYAHO	41114	ARTICLES, USED
ORIG	3418	CUYAHO	33121	STEEL INGOT OR SEMI-FINISHED SHAPES
ORIG	3418	CUYAHO	40211	IRON OR STEEL SCRAP,WASTES OR TAILING
ORIG	3418	CUYAHO	40241	PAPER WASTE OR SCRAP
DEST	3419	CUYAHO	20431	COOKED CEREALS,FLAKED,GRANULATED,POPP
DEST	3419	CUYAHO	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD
DEST	3419	CUYAHO	26471	SANITARY TISSUES OR HEALTH PRODUCTS
DEST	3419	CUYAHO	41114	ARTICLES, USED
DEST	3461	HANCOC	20621	SUGAR,GRANULATED OR POWDERED,SUGAR CU
ORIG	3461	HANCOC	36311	HOUSEHOLD RANGES,OVENS OR SURFACE COO
DEST	3472	JEFFER	10111	IRON DIRECT-SHIPPING ORES, CRUDE
DEST	3472	JEFFER	11212	PREPARED BITUMINOUS COAL
DEST	3472	JEFFER	32741	LIME OR LIME PLASTER
DEST	3472	JEFFER	40211	IRON OR STEEL SCRAP,WASTES OR TAILING
ORIG	3472	JEFFER	33121	STEEL INGOT OR SEMI-FINISHED SHAPES
ORIG	3472	JEFFER	33123	IRON OR STEEL SHEET OR STRIP
ORIG	3472	JEFFER	33127	TIN MILL PRODUCTS
ORIG	3472	JEFFER	40211	IRON OR STEEL SCRAP,WASTES OR TAILING
ORIG	3422	LORAIN	29914	COKE PRODUCED FROM COAL
ORIG	3422	LORAIN	33124	IRON OR STEEL BARS,BAR SHAPES OR RODS
ORIG	3422	LORAIN	33126	IRON OR STEEL PIPE,TUBES OR FITTINGS
ORIG	3422	LORAIN	40211	IRON OR STEEL SCRAP,WASTES OR TAILING
ORIG	3422	LORAIN	41114	ARTICLES, USED
DEST	3431	LUCAS	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD
ORIG	3431	LUCAS	1139	GRAIN,NEC
ORIG	3431	LUCAS	20411	WHEAT FLOUR
ORIG	3431	LUCAS	20412	WHEAT BRAN, MIDDLINGS OR SHORTS
ORIG	3431	LUCAS	20419	FLOUR OR OTHER GRAIN MILL PRODUCTS,NE
ORIG	3431	LUCAS	20431	COOKED CEREALS,FLAKED,GRANULATED,POPP
ORIG	3431	LUCAS	28125	POTASSIUM COMPOUNDS
ORIG	3431	LUCAS	29914	COKE PRODUCED FROM COAL
ORIG	3431	LUCAS	49057	FLAMMABLE COMPRESSED GASES
DEST	3449	STARK	40211	IRON OR STEEL SCRAP,WASTES OR TAILING
ORIG	3449	STARK	33124	IRON OR STEEL BARS,BAR SHAPES OR RODS
ORIG	3459	WYANDO	32959	NONMETALLIC MINERALS OR EARTHS,GROUND

----------------------------------- ST=PA -----------------------------------

	SPLC	COUNTY	STCC5	PRODUCT
DEST	2162	BUTLER	40211	IRON OR STEEL SCRAP,WASTES OR TAILING

----------------------------------- ST=SC -----------------------------------

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	4478	CHARLE	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD

----------------------------------- ST=TN -----------------------------------

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	4273	MCMINN	26212	GROUND WOOD PAPER, UNCOATED

----------------------------------- ST=TX -----------------------------------

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	6847	HARRIS	28151	CYCLIC INTERMEDIATES FROM BENZENE,
ORIG	6847	HARRIS	28212	SYNTHETIC RUBBERS
ORIG	6847	HARRIS	49122	COMBUSTIBLE LIQUIDS, POLYMERIZABLE
DEST	6848	HARRIS	26212	GROUND WOOD PAPER, UNCOATED
DEST	6848	HARRIS	33126	IRON OR STEEL PIPE,TUBES OR FITTINGS
ORIG	6848	HARRIS	26213	PRINTING PAPER,COATED OR UNCOATED,

----------------------------------- ST=VA -----------------------------------

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	2624	HOPEWE	26311	FIBERBOARD, PAPERBOARD OR PULPBOARD
ORIG	2624	HOPEWE	28191	AMMONIA OR AMMONIUM COMPOUNDS

----------------------------------- ST=WI -----------------------------------

	SPLC	COUNTY	STCC5	PRODUCT
ORIG	3231	DOUGLA	20411	WHEAT FLOUR
ORIG	3231	DOUGLA	26613	WALLBOARD