



**American Short Line and  
Regional Railroad Association**

*The Voice of America's Independent Railroads*

June 3, 2013

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Ms. Cynthia T. Brown  
Chief, Section of Administration  
Surface Transportation Board  
395 E St., S.W.  
Washington, D.C.

Re: Docket No. EP 707: Demurrage Liability

Dear Ms. Brown:

In its Decision dated May 21, 2013 in the above Docket, the Board invited the American Short Line and Regional Railroad Association (ASLRRA) to provide specific data about the numbers of railroads who would find electronic communication of notice more difficult than by telephone and why. It also seeks similar information about small carriers that deliver rail cars but are unaware of the receiver's identity. ASLRRA very much appreciates the interest of the Board in the effect of its proposed demurrage rule on small railroads and the opportunity to provide more specific data.

While it does not currently have any aggregate data on those subjects, ASLRRA views demurrage liability as a serious concern that deserves dependable data. After careful consideration it proposes to do an industry survey to get the data the Board requests and to follow up as necessary to obtain sufficient participation. Given its limited staff it is impossible for ASLRRA even to conduct the survey, much less organize the resulting data in presentable form and draft a report, within the stated Comment deadline of June 27, 2013. Therefore, ASLRRA requests an extension of the Comment deadline until August 30, 2013, which is the minimum time period it will need to prepare its report.

Respectfully,

Keith T. Borman  
**Vice President & General Counsel**