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BEFORE THE  
SURFACE TRANSPORTATION BOARD

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Ex Parte No. 542 (Sub-No. 18)

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REGULATION GOVERNING FEES FOR SERVICES

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REPLY COMMENTS OF  
CONSUMERS UNITED FOR RAIL EQUITY

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**REPLY COMMENTS OF CONSUMERS UNITED FOR RAIL EQUITY**

In its Notice served February 15, 2011 in this proceeding, the Surface Transportation Board ("Board") sought comments on its proposal to lower the filing fee for complaints. Consumers United for Rail Equity ("CURE") filed Initial Comments in response to that proposal.

According to the Board's website, six Comments (from a total of eight parties) were filed on the Board's proposal, including those of CURE. All supported the Board's proposals. No party opposed the proposals.

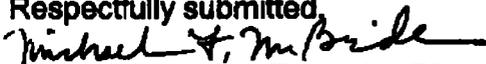
Most notably, the U.S. Department of Agriculture supported the proposal. Also, in addition to CURE's Comments, the American Public Power Association, the National Grain and Feed Association, the National Industrial Transportation League, the National Rural Electric Cooperative Association, The Fertilizer Institute, and the Western Coal Traffic League all supported the Board's proposal in all respects.

CURE commends the views of the Department of Agriculture to the Board. The Department of Agriculture is of course charged with responsibility for an enormously important sector of our society. For that reason, CURE believes that its views should be given great weight. CURE also endorses the views of the other organizations and associations that filed comments, each of which represent broad sectors of the U.S. economy. This sort of broad consensus in support of the Board's proposed actions should convince the Board, if it needed convincing, that its proposals are clearly in the public interest.

In particular, CURE wishes to emphasize that, although the Board had already reduced the filing fee for rate complaints filed under "stand-alone cost" methodology, to \$350, as Congress had directed in recent years, CURE of course supports the Board's proposal to make that \$350 filing fee "cap" permanent for all complaints filed with the Board.

Conclusion

CURE thanks the Board for its proposals to reduce the filing fee for all complaints to no more than \$350 and urges the Board to adopt that proposed reduction in filing fees as soon as possible.

Respectfully submitted,  
  
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