

BEFORE THE
SURFACE TRANSPORTATION BOARD

STB Ex Parte No. 431 (Sub-No. 4)

ENTERED
Office of Proceedings
March 4, 2013
Part of Public
Record

REVIEW OF THE GENERAL PURPOSE COSTING SYSTEM

JOINT REQUEST FOR AN EXTENSION OF TIME
TO FILE OPENING AND REPLY COMMENTS

On February 4, 2013, the Surface Transportation Board (“Board”) issued a Notice of Proposed Rulemaking (“NPR”) in the above captioned docket proposing certain changes to its general purpose costing system, the Uniform Railroad Costing System (“URCS”). Specifically, the NPR proposes to eliminate the so-called “make-whole” adjustment that accounts for the economies of scale realized from larger shipment sizes in the URCS Phase III calculation. The NPR proposes to replace the make-whole adjustment with changes to URCS Phase II and Phase III and would require modification of related reporting requirements. Pursuant to the NPR, opening comments are due on March 21, 2013 and reply comments are due on April 22, 2013.

The Association of American Railroads (“AAR”), the American Chemistry Council, the National Industrial Transportation League, and the Fertilizer Institute respectfully request that the Board extend the procedural time schedule until May 6, 2013 for the filing of opening comments and July 22, 2013 for the filing of reply comments to enable interested parties sufficient time to evaluate the proposed rule changes and meaningfully comment on them.

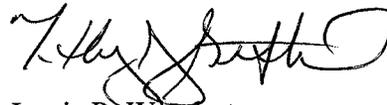
Due to the technical nature of the NPR, the AAR and other parties commenting on the proposed rule changes will need to engage expert consultants to evaluate the changes. There are a limited number of such qualified expert consultants and they are currently engaged in work related

to other Board proceedings, including the Board's request for empirical data in EP 711, *Petition for Rulemaking to Adopt Revised Competitive Switching Rules*. Such an extension would allow parties to develop a more complete record for consideration by the Board.

Counsel for the AAR has contacted counsel for the National Grain and Feed Association ("NGFA") and is authorized to state that NGFA supports the request for an extension of time to file opening and reply comments.

In addition, by a petition filed separately today, the AAR is seeking clarification of the Board's NPR and requesting that the Board make additional information available to the public to allow for better understanding of the proposed rule changes. The extension of time would also allow for the Board to rule on that request.

Respectfully submitted,



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Dated: March 4, 2013