

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

**ENTERED
Office of Proceedings
August 18, 2016
Part of
Public Record**

STB Docket No. EP 711 (Sub-No. 1)

RECIPROCAL SWITCHING

**REPLY TO PETITION FOR EXTENSION OF TIME
OF THE ASSOCIATION OF AMERICAN RAILROADS**

The National Grain and Feed Association ("NGFA") hereby replies to the Petition for Extension of Time of the Association of American Railroads ("AAR") filed in this proceeding on August 10, 2016. The NGFA commends the Board for issuing this Notice of Proposed Rulemaking ("NPRM"). The NGFA, its members and other interested agricultural parties anticipate continuing their active participation in this critically important matter. In response to the AAR's proposed schedule, the NGFA does not object to the October 26, 2016 date for Opening Comments proposed by the AAR, as the NGFA will need time to thoroughly discuss and receive input from its members on the NPRM, most importantly its Rail Shipper Receiver/Committee. Given pre-harvest logistics preparations, this large committee will not be able to meet until late September or early October.

Regarding the appropriate date for Reply Comments, the NGFA does not agree with AAR's January 13, 2017 proposal, for the reasons expressed by the National Industrial Transportation League ("NITL") and American Chemistry Council ("ACC") in their replies to AAR's filing. The NGFA suggests, however, instead of the November 30, 2016 date proposed by NITL, the date for Reply Comments should be December 5, 2016. The NGFA proposes that

the other dates in the schedule for requests for Ex Parte meetings with Board members and staff, and for the meetings themselves, should be adjusted accordingly, such that the modified schedule proposed by the NGFA would be as follows:

| | |
|---------------------------------|-------------------------------------|
| Opening Comments: | October 26, 2016 |
| Reply Comments: | December 5, 2016 |
| Requests for Ex Parte meetings: | November 4, 2016 |
| Ex Parte meetings occur: | December 5, 2016 to January 6, 2017 |

Respectfully submitted,



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August 18, 2016

CERTIFICATE OF SERVICE

I do hereby certify that on this 18th day of August, 2016, I have served a copy of the foregoing Reply to Petition for Extension of Time of the Association of American Railroads by email and first class mail on the following persons or entities:

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