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ASSOCIATION OF AMERICAN RAILROADS
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Office of Proceedings
July 14, 2015
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July 14, 2015

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

Re: EP 701, *Accelerating Reporting Requirements for Class I Railroads* and EP 720, *Accounting and Reporting of Business Combinations, Security Investments, Comprehensive Income, Derivative Instruments and Hedging Activities*

Dear Ms. Brown:

On July 8, 2015, the Surface Transportation Board ("Board") separately issued two notices of proposed rulemaking in the above captioned proceedings. Both proceedings relate to proposed changes to the reporting of financial and accounting information by Class I railroads required by the Board. Comments are due in both proceedings on August 7, 2015 and replies are due on September 8, 2015.

In light of the fact that comments are due shortly after the end of the period that publicly traded railroads will report their second quarter earnings and shortly after the Board's two-day hearing in EP 722 and EP 664 (Sub-No. 2), the railroad finance, accounting, and legal personnel that will be involved in these proceedings will be substantially burdened to comply with the current schedules. The Association of American Railroads ("AAR"), on behalf of its Class I freight railroad members, respectfully requests a modest two-week extension of time to the schedule to provide comments and replies. The AAR asks that comments be due on August 21, 2015 and replies be due on September 22, 2015.

Sincerely,

Timothy J. Strafford
Counsel for the Association
of American Railroads