

SLOVER & LOFTUS LLP

ATTORNEYS AT LAW

1224 SEVENTEENTH STREET, N.W.
WASHINGTON, D.C. 20036-3003

WILLIAM L. SLOVER
C. MICHAEL LOFTUS
JOHN H. LE SEUR
KELVIN J. DOWD
ROBERT D. ROSENBERG
FRANK J. PERGOLIZZI
ANDREW B. KOLESAR III
PETER A. PFOHL
DANIEL M. JAFFE
KATHERINE F. WARING
BRADFORD J. KELLEY

TELEPHONE:
(202) 347-7170

FAX:
(202) 347-3619

WRITER'S E-MAIL:

OF COUNSEL
DONALD G. AVERY
CHRISTOPHER A. MILLS

October 19, 2016

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

ENTERED
Office of Proceedings
October 19, 2016
Part of
Public Record

Re: Docket No. EP 736, *InterVISTAS Study* – Supporting
Workpaper Request

Dear Ms. Brown:

On September 22, 2016, the Board released a study prepared by its contractor, InterVISTAS Consulting LLC, entitled “*An Examination of the STB’s Approach to Freight Rail Rate Regulation and Options for Simplification*” (“InterVISTAS Report” or “Report”).

Subsequently, the Board announced that it plans to “hold an economic roundtable regarding the issues and conclusions presented in the [InterVISTAS Report]” on October 25, 2016, followed by “a public hearing on [InterVISTAS Report] for all stakeholders and interested parties to participate in this important discourse” at a future date. *InterVISTAS Study*, EP 736, slip op. at 1-2 (STB served Oct. 12, 2016).

The Western Coal Traffic League (“WCTL”) respectfully requests that the Board provide its undersigned counsel with copies of the workpapers and data supporting, and sufficient to replicate: (i) the Three-Benchmark Analyses calculations shown in Figure 5-1 (p. 64), Figure 5-2 (p. 65), Table 5-2 (p. 66), Table 5-3 (p. 67), Figure II-1 (p. 141) and Figure II-2 (p. 142) of the Report (including the derivation of the R/VC_{comp} ratios used in making these calculations); and (ii) the Simplified Stand Alone Cost Analyses calculations shown in Table 5-5 (p.70), Table 5-6 (p.72) and Figure 5-3 (p.73) of the Report (including URCS Phase II Modified data referenced at p.70, the

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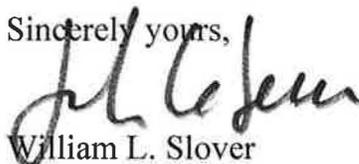
inputs used to develop the simple regression set forth at p.71, and the DCF model referenced on p. 72).

Provision of the requested workpapers and data will facilitate WCTL's review of the Report and is consistent with the Board's stated desire to consider the Report findings and analyses "in open and transparent fora." STB Press Release No. 16-25, *Independent Study on Rate Case Methodology Alternatives Released* (Sept. 22, 2016).

If the Board determines that any of the requested material contains confidential information, WCTL counsel is amenable to entering into standard arrangements with the Board to protect the confidentiality of this information.

Thank you for your consideration of this request.

Sincerely yours,

A handwritten signature in black ink, appearing to read "JL Slover".

William L. Slover

John H. LeSeur

Daniel M. Jaffe

Attorneys for WCTL