



August 23, 2016

241376

Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E. Street, SW
Washington, DC 20423-0001

ENTERED
Office of Proceedings
September 1, 2016
Part of
Public Record

Subject: Docket Number ISM 35008
Transportation and Logistics Council
Petition for Suspension and Investigation

Docket Number ISM 35008 was filed by the Transportation and Logistics Council regarding amendments made to the Uniform Straight Bill of Lading by the National Motor Freight Traffic Association.

ODW LTS is a freight broker (MC-679673) and as such we have 250+ shipper clients who depend on us for support. The majority of our clients are small to mid-size businesses who count on us to protect their interests. These amendments, so effectively presented by the Transportation and Logistics Council (TLC), place an undue burden on all of our clients that was certainly not intended when the Carmack Amendment (40 USC 14706) was enacted.

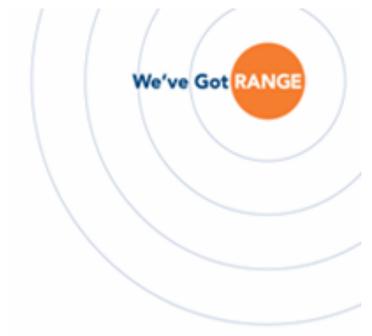
Please note that we fully support, on behalf of our clients, the position that TLC has taken and urge the STB to use the authority it is empowered with to suspend STB NMF 100-AP, Supplement 2 in its entirety and proceed with the appropriate investigation.

Sincerely,

A handwritten signature in black ink that reads "Dave Giblin". The signature is written in a cursive, slightly slanted style.

Dave Giblin
ODW LTS, LLC

c: Transportation and Logistics Council
Paul Levine
John M. Cutler Jr.
John Bagileo
George Carl Pezold



I certify that I have this day served copies of document upon all parties of record in this proceeding, by U.S. Mail.

Signature

David M. Hill

Date

September 1, 2016