

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

**ENTERED
Office of Proceedings
August 15, 2016
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Public Record**

STB Ex Parte No. 711 (Sub-No.1)

Reciprocal Switching

**PETITION OF THE AMERICAN SHORT LINE AND REGIONAL RAILROAD ASSOCIATION
FOR AN EXTENSION OF TIME TO COMMENT**

The Notice of Proposed Rulemaking published by the Board on July 27, 2016 presents issues of existential importance to all participants in the rail industry. Despite nominal exemptions it is clear that these rules would have known and presently unknown effects on even the smallest carriers. Ascertaining and then understanding these effects will be a particularly complex task with reference to the very diverse 450 railroads that constitute the membership of the American Short Line and Regional Railroad Association (ASLRRA). In order to survey the membership, assemble a team of experienced analysts, review the data and prepare informed Comments on this matter, ASLRRA believes that an extension of time to comment is imperative.

ASLRRA has reviewed the Petition for an Extension of Time filed by the Association of American Railroads in the proceeding and concludes that the period of extension it has requested is appropriate and necessary and urges the Board to adopt that procedural schedule:

October 26, 2016	Opening Comments due
January 13, 20-17	Reply Comments due
January 13, 2017	Requests for ex parte meetings with Board members due.
January 30, 2017	Ex Parte meetings with Board members begin

ASLRRA concurs with the observation that an extended reply period is in the best interest of a full and carefully considered record. The Thanksgiving and year-end holiday period makes it difficult to convene during those weeks and could necessitate shortcuts not consistent with a strong record just to meet holiday-constrained deadlines.

Respectfully submitted,

A handwritten signature in cursive script that reads "Keith T. Borman".

Keith T. Borman
Vice President and General Counsel
American Short Line and Regional Railroad Association
Suite 7020
50 F Street NW
Washington, D.C. 20001

August 15, 2016