



**AMERICAN SHORT LINE AND  
REGIONAL RAILROAD ASSOCIATION**

*The Voice of America's Independent Railroads*

233916

February 28, 2013

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Surface Transportation Board  
395 E Street, S.W.  
Washington, D.C. 20423

RE: Opening Submission in re Ex Parte 711: Petition for Rulemaking to Adopt Revised  
Competitive Switching Rules

Dear Members of the Board:

The American Short Line and Regional Railroad Association (ASLRRA) and its approximately 450 member Class II and Class III railroads are vitally concerned about the impact of the rule changes proposed in Ex Parte 711. Although exempted by express provision the proposal contains several provisions whose implications for small railroads are at best uncertain.

ASLRRA understands that at this stage of the proceeding the Board has called for in-depth studies of the effect of the proposed rule on Class I railroads. Because ASLRRA did not conduct a study it will not offer an substantive Opening Submission at this time. Nevertheless, the studies that other interested parties submit may include data or conclusions which have relevance for small railroads in the context of this rulemaking. Therefore, ASLRRA submits this letter to the docket in order to preserve its right to submit a Response on or before May 30, 2013 or at such other time as the Board may designate.

Respectfully,

Keith T. Borman  
Vice President & General Counsel