

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Proceedings
May 29, 2015
Part of
Public Record

Docket EP 665-1

RAIL TRANSPORTATION OF GRAIN, RATE REGULATION REVIEW

**NOTICE OF INTENT TO PARTICIPATE IN PUBLIC HEARING
OF THE NATIONAL GRAIN AND FEED ASSOCIATION**

The National Grain and Feed Association ("NGFA") hereby provides notice pursuant to the Decision served in this proceeding on May 8, 2015, that it desires to participate in the public hearing to be held on June 10, 2015. The NGFA's presentation will be made by four individuals: (1) Mr. Kevin Thompson, Chairman of its Rail Shipper/Receiver Committee; and Assistant Vice President and Transportation Lead for Cargill Incorporated, Minneapolis, MN; (2) Mr. Bruce Sutherland, Vice President, Michigan Agricultural Commodities, Lansing, Michigan, who is immediate past Chairman of the NGFA's Country Elevator Committee and a current member of the NGFA Board of Directors; (3) Mr. Thomas D. Crowley, President, L.E. Peabody & Associates, Inc., and (4) Mr. Thomas W. Wilcox, Principal, GKG Law, P.C.

The NGFA requests that the Board allot a total of 55 minutes for the NGFA's presentation, with 5 to 7 minutes of the total time reserved for rebuttal, if it is permitted by the Board. As for the key points the speakers intend to present:

Mr. Thompson will provide an overview of the reasons for the NGFA's participation in this proceeding, and will highlight key aspects of the NGFA's specific

rate rule proposal. He also intends to provide comments on the requirement that carriers file agricultural contract summaries under 49 C.F.R. Part 1313.

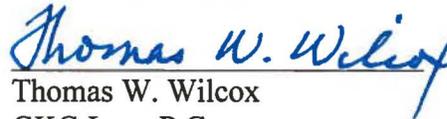
Mr. Sutherland will provide the Board with testimony on some of the practical market impacts on shippers and agricultural producers from current Class I railroad rate setting practices in the absence of effective rate review rules.

Mr. Crowley will summarize the specific components of the NGFA's proposed Ag Commodity Maximum Rate Methodology ("ACRM"), the economic and policy justifications for it, and how the methodology would work in practice, including the expected economic impact on the railroads. He will also address the issue of making movement specific adjustments to URCS in rate cases involving grain shipments.

Mr. Wilcox will address certain legal issues associated with the NGFA's ACRM proposal and the topics listed in the Board's May 8 Decision.

Finally, given previously existing schedule conflicts for Messrs. Thompson and Sutherland on June 11, NGFA respectfully requests that its testimony be scheduled for June 10 rather than June 11 if at all possible. We appreciate the Board's indulgence in this regard.

Respectfully submitted,



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May 29, 2015