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September 15, 2016
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By E-Filing

September 15, 2016

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

**Re: Docket No. EP 704 (Sub-No. 1), Review of Commodity,
Boxcar, and TOFC/COFC Exemptions**

Dear Ms. Brown:

On September 12, 2016, a letter from SA Recycling was made part of the public record in the reference docket. In its late-filed letter, SA Recycling makes several vague claims about its experience with rail transportation of ferrous scrap, and it urges the Board to revoke the commodity exemption applicable to transportation of iron and steel scrap.

Union Pacific provides rail transportation for at least some of the scrap shipped by SA Recycling. If SA Recycling had filed its comments on a timely basis, Union Pacific would have submitted reply evidence establishing that SA Recycling's claims are not consistent with that company's experience on Union Pacific. Union Pacific works with SA Recycling to establish competitive rates, fills approximately 99% of SA Recycling's car orders, and has an excellent record of on-time performance at SA Recycling's facilities.

If the Board intends to give SA Recycling's comments any weight, Union Pacific asks that it be given an opportunity to respond in detail to those comments.

Sincerely,



Michael L. Rosenthal
*Counsel for Union Pacific
Railroad Company*