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July 16, 2014

Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

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Office of Proceedings
July 16, 2014
Part of
Public Record

RE: Docket No. NOR 42130, SunBelt Chlor Alkali Partnership v. Norfolk Southern Railway Company

Dear Ms. Brown:

SunBelt Chlor Alkali Partnership ("SunBelt") is in receipt of the "Reply to Complainant's Motion for Extension of Page Limit," filed today by Norfolk Southern Railway Company ("NS"). NS seems to believe that SunBelt has requested the right to file a second technical corrections petition, and to do so individually rather than jointly with NS. SunBelt explained its intent on page 3 of its Motion. Nevertheless, NS may have been confused by SunBelt's use of the phrase "technical corrections supplement." Therefore, I write solely for the purpose of clarifying the scope of SunBelt's Motion, which appears to have confused NS, in the event it may also have confused the Board.

SunBelt agrees with NS that technical corrections are solely the province of a joint petition to which both parties agree. If both parties do not agree that an issue is a technical correction, then the party raising the issue may only do so in a petition for reconsideration. Due to the timing concerns described in SunBelt's Motion, the parties will not know until just before the filing deadlines for both technical corrections and reconsideration petitions what, if any, issues exist that the parties might not agree are technical in nature, and thus, in which pleading to address those issues. SunBelt's request for a "technical corrections supplement" to the petitions for reconsideration is a request to extend the page limits of the reconsideration petitions by an additional 20 pages (for a total of 50 pages) solely for the purpose of addressing those matters that the parties are unable to agree are technical in nature, if any, and only those matters. Because SunBelt's 30 page request (to which NS does not object) assumes complete agreement among the parties as to whether an issue is technical in nature, additional pages will be necessary for a petition for reconsideration if that assumption proves incorrect.

Sincerely,



Jeffrey O. Moreno

cc: Counsel for Defendant Norfolk Southern Railway Company