

BEFORE THE
SURFACE TRANSPORTATION BOARD

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

RECIPROCAL SWITCHING

REPLY OF THE AMERICAN CHEMISTRY COUNCIL
IN OPPOSITION TO THE AAR PETITION FOR EXTENSION OF TIME

The American Chemistry Council (ACC) opposes the Association of American Railroads' (AAR) petition for an extension of time for opening and reply comments in *Ex Parte* 711. AAR's proposed procedural schedule would add unnecessary delays to this important matter, which has been pending for more than five years. ACC does not oppose the more limited time extension proposed by the National Industrial Transportation League (NITL).

ACC commends the Board for issuing a proposal to update its outdated reciprocal switching rules and urges the Board not to prolong the procedural schedule any longer than necessary. The Board has already established an extensive record on the core issues of reciprocal switching. ACC believes that the specific new issues presented in the Board's proposal are not overly complex and can be reasonably addressed without the extension proposed by AAR.

ACC does not object to the alternative procedural schedule proposed by NITL. This limited extension would provide stakeholders with sufficient additional time to prepare comments on the Board's proposals and allow the Board to conduct *Ex Parte* meetings and receive opening and reply comments by the end of 2016.

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