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April 29, 2015

VIA E-FILING

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

**RE: United States Rail Service Issues – Performance Data Reporting
STB Docket No. EP 724 (Sub-No. 4)**

Dear Ms. Brown:

In response to the Board's Notice of Proposed Rulemaking ("NPR") issued December 30, 2014 in the above proceeding, The Kansas City Southern Railway Company ("KCS"), on March 2, 2015, filed its initial individual comments in this proceeding ("Comments"). KCS also joined in the concurrently-filed comments of the Association of American Railroads ("AAR").

KCS's Comments specifically endorsed the Board's proposal to exempt KCS from filing state-specific information in response to Request nos. 7 and 8. Other than KCS, no party addressed the Board's proposal to exempt KCS from filing state-specific information in response to Request nos. 7 and 8.

For the reasons set forth in KCS's Comments, there are good policy and statutory reasons for the proposed KCS partial exemption. Accordingly, if the Board adopts the proposed rules - which, for the reasons articulated in AAR's April 29, 2015 Reply Comments, the Board should not do - the Board should at the very least adopt the proposed exemption for KCS from filing state-specific information in response to Request nos. 7 and 8.

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Mr. Cynthia Brown

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If there are any questions, please do not hesitate to contact me.

Sincerely,



William A. Mullins
Attorney for The Kansas City Southern
Railway Company

cc: Parties of Record
Warren K. Erdman
W. James Wochner
David C. Reeves