



**AMERICAN SHORT LINE AND
REGIONAL RAILROAD ASSOCIATION**

The Voice of America's Independent Railroads

August 10, 2013

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

234660
ENTERED
Office of Proceedings
August 12, 2013
Part of
Public Record

Re: Grafton & Upton Railroad Co.--Petition for Declaratory Order
Finance Docket No. 35752

Dear Ms. Brown:

The American Short Line and Regional Railroad Association submits this letter in support of the petition for a declaratory order filed by Grafton & Upton Railroad in the above captioned proceeding.

As explained in the petition, Grafton & Upton proposes to complete the construction of and to operate a propane transloading facility in its yard in Grafton, Massachusetts. Transloading facilities are vitally important to short lines like Grafton & Upton and its customers in order to provide transportation of various bulk commodities that require transfer from rail to truck for final delivery. ASLRRA believes that the Board should continue to foster such transloading facilities and service by confirming that federal preemption applies to efforts by state and local authorities to restrict or prohibit such rail transportation.

ASLRRA also supports the request by Grafton & Upton for expedited handling of the petition. The project, which contemplates the completion of construction of the facility on property owned by Grafton & Upton and operation with its own employees, has been subject to a lengthy delay due to State and local regulatory efforts. The issues now before the Board are straightforward and hopefully can be resolved promptly.

For the reasons outlined above, therefore, ASLRRA respectfully urges the Board to act on an expedited basis and to grant the petition. Thank you very much for your consideration of this letter of support.

Respectfully,

Keith T. Borman
Vice Pres. & General Counsel

cc: Parties of record