

**PATTON BOGGS LLP**  
ATTORNEYS AT LAW

2550 M Street, NW  
Washington, DC 20037-1350  
202-457-6000

Facsimile 202-457-6315  
www.pattonboggs.com

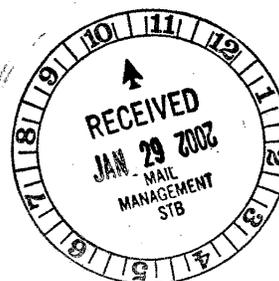
January 29, 2002

Docket Number		
SSM	22	8 204614
SSM	25	9 -204615
SSM	34	10 -204616
SSM	45	16 -204617
SSM	46	21 -204618
SSM	55	2 -204619
SSM	58	4 -204620
SSM	60	11 -204621
SSM	63	4 -204622
SSM	70	12 204623
SSM	116	1 204624

Scott N. Stone  
202.457.6335  
sstone@pattonboggs.com

**Via Hand Delivery**

Office of the Secretary  
Case Control Unit  
Attn: §5a Application No. 118  
Surface Transportation Bureau  
1925 K Street, NW  
Washington, DC 20423-0001



Re: Sec. 5A Application No. 118 (Sub-No. 2) 204613

Gentlemen:

Attached is an original and ten copies of the corrected first page of the Reply of the Halogenated Solvents Industry Alliance, Inc. to Petitions for Reconsideration. This petition was filed with the Board on January 22, 2002, and has been amended to correct the Sub-No. in the above-captioned proceeding.

Please acknowledge receipt of this correction by date-stamping the enclosed duplicate copy and returning it with our messenger. Thank you.

Sincerely,

*Scott N. Stone / ds*

Scott N. Stone

ENTERED  
Office of the Secretary  
JAN 29 2002  
Part of  
Public Record

cc: All Parties of Record

ENTERED  
Office of the Secretary  
JAN 29 2002  
Part of  
Public Record

BEFORE THE  
SURFACE TRANSPORTATION BOARD



Sec. 5A Application No. 118 (Sub-No. 2), et al.,  
EC-MAC MOTOR CARRIERS SERVICE ASSOCIATION, INC., ET AL.  
(and embraced dockets)

Reply of the  
Halogenated Solvents Industry Alliance, Inc.  
to Petitions for Reconsideration

The Halogenated Solvents Industry Alliance, Inc. ("HSIA") respectfully submits this reply to the petitions submitted by various parties seeking Board reconsideration of the decision served November 20, 2001 in this docket and embraced cases.

Statement of HSIA's Interest

HSIA is a non-profit trade association representing companies that manufacture, distribute and use halogenated solvents such as dichloromethane and trichloroethylene. Such solvents are often shipped by motor carrier, both in bulk tanker and, in packaged form, in truckload or less-than-truckload shipments. Several HSIA members formulate industrial and commercial products (e.g., aerosols, adhesives, and coating removers) with chlorinated solvents and ship these products exclusively by motor freight, often by common carrier.

Summary

None of the arguments advanced by the Rate Bureaus justifies reconsideration. The "truth-in-rates" condition was a logical outgrowth of the issues noticed by the Board in its decision of February 11, 2000 inviting comments, and the need for the condition was amply established by the Board's factual findings.