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March 7, 2005



Via E-Filing and UPS Overnight

Honorable Vernon Williams
Secretary
Surface Transportation Board
1925 K Street, N.W., Room 711
Washington, D.C. 20423

ENTERED
Office of Proceedings

MAR - 8 2005

Part of
Public Record

Re: Ex Parte No. 657, Rail Rate Challenges Under
the Stand-Alone Cost Methodology

Dear Secretary Williams:

Union Pacific welcomes this opportunity for interested parties to offer comments on stand-alone cost methodology. We intend to participate in this proceeding both by filing written comments and by appearing at the hearing. I request an allotment of fifteen (15) minutes to appear on behalf of Union Pacific.

Union Pacific does not object to the shippers' request dated February 28, 2005 for an extension of time for the filing of comments and a later hearing date. The alternative dates proposed by the shippers create a conflict for Union Pacific counsel. Accordingly, if the Board is inclined to grant an extension, Union Pacific would ask the Board to schedule a hearing date in early May. The shippers have indicated in their request that they do not object to reasonable accommodation of other parties' schedules.

Sincerely,

cc: David M. Konschnik
Raymond A. Atkins
Shippers' Counsel
Railroad Counsel

Louise Anne Rinn
Associate General Counsel

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