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215702

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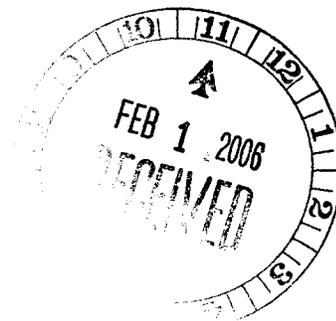
• ROBERT L. McCARTY
Associate General Counsel

• DANIEL R. ELLIOTT, III
Associate General Counsel

UPS Next Day Air

January 31, 2006

Vernon A. Williams, Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423-0001
(202) 565-1674



Re: STB Ex Parte No. 647

Dear Secretary Williams:

Please find enclosed the original and ten copies of United Transportation Union's Notice of Intent to Participate for filing in the above-captioned matter.

Thank your for your cooperation.

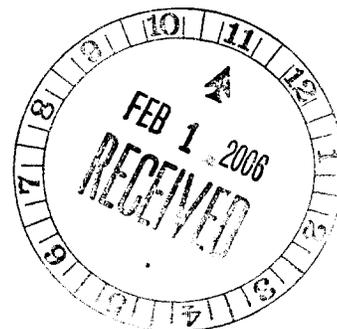
Sincerely,

Daniel R. Elliott, III
Associate General Counsel

Enclosures

215702

**BEFORE THE
SURFACE TRANSPORTATION BOARD**



STB Ex Parte No. 647

**CLASS EXEMPTION FOR EXPEDITED
ABANDONMENT PROCEDURE FOR
CLASS II AND CLASS III RAILROADS**

**UNITED TRANSPORTATION UNION'S
NOTICE OF INTENT TO PARTICIPATE**

United Transportation Union ("UTU") respectfully submits its notice of intent to participate in the above-captioned proceeding pursuant to the Surface Transportation Board's ("STB") Decision served on January 19, 2006. The STB stated therein "[b]efore deciding whether to issue a Notice of Proposed Rulemaking, the Board seeks comments from interested persons on this proposal and possible alternatives to it." UTU was one of the organizations which raised its concern about possible labor protection evasion as a result of Petitioners' revised rules. The STB sought further comments on this subject which UTU intends to address in its comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. R. Elliott, III'.

Daniel R. Elliott, III
Associate General Counsel
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