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The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423-0001

Re: STB Ex Parte No. 656 (Sub No. 1)

Dear Secretary Williams:

March 24, 2006

YRC Worldwide Inc. ("YRC"), formerly known as Yellow Roadway Corporation, Inc., responds to the late-filed joint comment, dated February 21, 2006, from Congressmen Davis, Dent, Emanuel, Gillmor, and Hall, urging the Surface Transportation Board ("STB") to eliminate the long-standing antitrust exemption from the antitrust laws the National Classification Committee possesses for its STB approved and regulated classification-setting activities.

YRC, a Fortune 500 corporation, is a holding company for a portfolio of transportation companies, including Yellow Transportation, Roadway Express, Reimer Express Lines, Meridian IQ, USF Holland, USF Reddaway, USF Bestway, USF Glen Moore, and New Penn Motor Express. This YRC enterprise provides global transportation services, transportation management solutions, and logistics management.

Headquartered in Overland Park, KS, YRC employs approximately 70,000 people worldwide. YRC's less-than-truckload ("LTL") carriers compete in an approximately 30 *billion* dollar a year market.¹

The five Congressmen have not been informed correctly about the fundamental nature and benefit associated with the National Motor Freight Classification process. As a result, they fail to understand that the classification is of mutual benefit to motor carriers and shippers alike. Both use it everyday as a tool. It provides the beginning point for motor carriers and their customers to negotiate a final net price. The net price ultimately represents individually negotiated discounts, special exceptions, accessorial, etc.

Approximately 1,000 LTL carriers and hundreds of thousands of shippers, including the YRC motor carrier family and its customers, rely upon the classification to reach final net prices for moving the tens of thousands of commodities they transport every day. Without access to this system and this

¹ Robert Baird Investments, September 2005, Transportation – Truckload and Less-Than-Truckload overview.

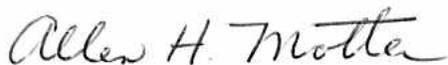
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classification as a guide, hundreds of small LTL carriers would be at a distinct competitive disadvantage. They would have to develop this expertise in-house and it would undoubtedly increase their costs. Smaller carriers and shippers lack the expertise, sophistication, and resources necessary to develop a comparable system. Once again, shippers themselves elect to use the classification system independently as a reference point for their own negotiations with motor carriers. Therefore, the classification is not only a mere starting point for arriving at a negotiated net price, it is strictly voluntary. No motor carrier or shipper has to use it, and thousands of carriers and shippers do not, preferring to use a system of rating commodities based upon density, distance, hundred-weight, or other alternatives.

The advantage of the classification system, as well as its primary objective, is that it provides a uniform basis to determine the transportation characteristics of a particular commodity, by primarily examining its density, handling, stowability, and value. Shipper participation in the process of developing the classification, now guaranteed by the STB, is essential to achieving this objective.

In summary, YRC believes that the letters from the Congressmen are not representative of the industry as a whole and certainly do not warrant the drastic action of eliminating the long-standing antitrust exemption upon which thousands and thousands of motor carriers and shippers now rely upon *every day*.

Respectfully,



Allen H. Motter
Sr. Corporate Counsel & Assistant Secretary
YRC Worldwide Inc.

cc: Congressman Danny K. Davis
Congressman Charles W. Dent
Congressman Rahm Emanuel
Congressman Paul E. Gillmor
Congressman Ralph M. Hall
Michael Kelley, VP Governmental Affairs, YRC Worldwide Inc.
Bruce Kennedy, VP Pricing, YRC Regional
Adam Blankenship, VP Pricing, Yellow Transportation
Christina F. Lauria, VP Pricing, Roadway Express