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March 30, 2007

VIA E-FILING

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

RE: STB Finance Docket Nos. 34890, 34922, 34985, and 34889
PYCO Industries, Inc. — Feeder Line Application — Lines Of South Plains Switching, Ltd. Co.; Keokuk Junction Railway Co. — Feeder Line Application — Lines of South Plains Switching, Ltd. Co.; Hanson Aggregates, Inc. and Hanson Aggregates WRP, Inc. — Alternative Rail Service — South Plains Switching, Ltd. Co.; PYCO Industries, Inc. — Alternative Service — South Plains Switching, Ltd. Co.

Dear Secretary Williams:

I am writing on behalf of Keokuk Junction Railway Co. (“KJRY”) in connection with the four above-referenced proceedings to address an issue that has arisen among South Plains Switching, Ltd. Co. (“SAW”), PYCO Industries, Inc. (“PYCO”), and Hanson Aggregates, Inc. (“Hanson”). It appears, pursuant to a filing submitted by SAW in Finance Docket Numbers 34890, 34985 and 34889 on March 16, 2007 (“SAW’s March 16 Filing”), that SAW wishes to revise its evidence concerning the property that, among other things, is included in PYCO’s “All-SAW” Feeder Line Application (“FLA”) and KJRY’s Competing Feeder Line Application (“C-FLA”). Specifically, SAW has requested leave to file a Supplemental Verified Statement of Edward W. Landreth to “correct” certain “clerical errors” contained in Mr. Landreth’s prior testimony in the Finance Docket No. 34890 proceeding in an effort to remove certain property from an inventory of tracks that Mr. Landreth evaluated on SAW’s behalf in the course of the feeder line process.

In its reply filing of March 28, 2007 (“PYCO’s March 28 Filing”), PYCO opposes SAW’s March 16 Filing, insisting that the property in question should remain part of the All-

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SAW inventory for purposes of the feeder line proceedings. Like the SAW filing to which it responds, the caption to PYCO's reply refers to the Finance Docket Nos. 34890, 34985 and 34889 proceedings but not to KJRY's C-FLA, docketed as Finance Docket No. 34922.

KJRY takes no position at this time concerning the merits of the issues presented in SAW's and PYCO's respective filings. KJRY observes, however, that the scope of the property subject to PYCO's All-SAW FLA in Finance Docket No. 34890 – which SAW and PYCO are debating through their most recent filings – is equally relevant to KJRY's All-SAW C-FLA. Accordingly, KJRY urges the Board to incorporate SAW's and PYCO's filings on this issue into the record in Finance Docket No. 34922. Likewise, whatever decision the Board makes with respect to scope of the property included in Finance Docket Nos. 34890, 34985 and 34889 should also apply to KJRY's C-FLA.

If there are any questions about this matter, please contact me directly, either by telephone: (202) 663-7823 or by e-mail: wmullins@bakerandmiller.com.

Respectfully submitted,



William A. Mullins
Attorney for Keokuk Junction Railway Co.

cc: All Parties of Record