

221881

HOGAN & HARTSON

ENTERED
Office of Proceedings

MAR 24 2008

Part of
Public Record

Hogan & Hartson LLP
Columbia Square
555 Thirteenth Street, NW
Washington DC 20004
+1 202 637 5600 Tel
+1 202.637.5910 Fax

www.hhlaw.com

March 24, 2008

George W Mayo, Jr
Partner
202/637-5679
gwmayo@hhlaw.com

Surface Transportation Board
Attn: SIB I.x Parte No. 677
395 I. Street, S.W.
Washington, D C. 20423-0001



RE: Common Carrier Obligation of Railroads

To Whom It May Concern.

Please be advised that Arkansas Electric Cooperative Corporation ("AECC") intends to participate in the public hearing to be held in this matter on April 24, 2008

AECC's proposed speaker will be Mr Steve Sharp, Principal Engineer-Fuels & Civil, AECC The topics that AECC will address are:

- service limitations resulting from a capacity constrained environment,
- carrier-imposed requirements for infrastructure investments by shippers;
- the impact of volume requirements or incentives;
- economically-motivated service reductions and metering of the demand for service;
- the proper use of rail embargoes; and
- parties to whom the common carrier obligation applies.

AECC's comments will focus particularly on the interests of unit train shippers. AECC expects to highlight interrelationships between the common carrier obligation and (a) the Board's mandate under Section 10101(9) to encourage honest and efficient management, (b) the Board's mandate under Section 10101(5) to foster sound economic conditions in transportation, (c) the public disclosure requirements imposed by Section 11101(b); (d) the attainment by rail carriers of revenue adequacy; (e) paper barriers/interchange commitments; and (f) the Board's bottleneck rule.

AECC requests 15 minutes to make its presentation at the hearing

Respectfully,

Eric A. Von Salzen
George W Mayo, Jr.
Counsel for Arkansas Electric
Cooperative Corporation