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October 7, 2010

Ms. Cynthia Brown
Chief, Section of Administration
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395 E Street, SW
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OCT - 7 2010

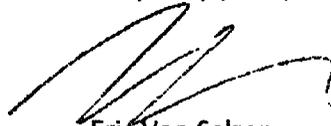
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RE: STB Finance Docket 35305
Petition of Arkansas Electric Cooperative Corporation For A Declaratory
Order

Dear Ms. Brown:

In the Reply filed by BNSF Railway Co. today in response to Arkansas Electric Cooperative Corporation's motion for stay, BNSF asserted that AECC lacks standing to seek a stay, because "AECC is not even a shipper of PRB coal." See BNSF Reply at 7. I am fully aware of the Board's prescription against the filing of a reply to a reply, but I do wish to call to the Board's attention that AECC's motion was expressly supported by the American Public Power Association, Edison Electric Institute, and National Rural Electric Cooperative Association (see AECC's motion at 1 n. 1), as well as by Western Coal Traffic League (see Coal Shipper Organizations' motion at 2 n. 1).

Very truly yours,



Eric Von Salzen

Counsel for Arkansas Electric Cooperative Corporation

cc: All Parties of Record (via electronic mail)