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November 6, 2019

The Honorable Chairman Ann D. Begeman
The Honorable Vice Chairman Patrick Fuchs
The Honorable Marty Oberman

Surface Transportation Board
395 E. Street, S.W.
Washington, DC 20423

RE: Docket EP 759, DEMURRAGE BILLING REQUIREMENTS

Dear Chairman Begeman, Vice Chairman Fuchs and Board Member Oberman:

As COO of Valley Distributing & Storage Company, I support the Surface Transportation Board's proposed changes to the regulations governing demurrage liability detailed in EP 759. I attended the Oversight Hearing on Demurrage and Accessorial Charges this past May which I believe presented evidence of unfair demurrage billing practices by the railroads. I especially support that portion of the Notice Of Proposed Rulemaking under subheading B, Issuing Demurrage Invoices directly to Shippers Instead of Warehousemen, with the agreement of Shippers.

Thank you to the Surface Transportation Board for allowing us the opportunity to voice our concerns and for your attention to this matter.

Sincerely,

Carol K. Keup

Chief Operating Officer