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Ms. Cynthia Brown, Section Chief
Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

Re: FD 36447, Lake Providence Port Commission—Feeder Line Application—
Line of Delta Southern Railroad Located in East Carroll and Madison
Parishes, Louisiana

Dear Ms. Brown:

On March 9, 2021, the Board suspended the procedural schedule in the above-referenced proceeding. By further order served June 1, the Board directed the parties to confer and report back to the Board on the status of any remaining discovery issues by June 15. By letter dated June 15, I advised the Board that the parties have thoroughly responded to DSR's Request for Production of Documents. On June 15, NLA also filed a Motion for Protective Order that would permit it to release certain confidential documents. Following the Board's grant of that motion, I released all the Confidential Documents that were filed under seal to the Board.

Today, DSR has filed a letter requesting additional time to review these documents. In considering DSR's request, the Board is asked to note that DSR has had months to review the hundreds of documents that were previously released by LPPC and SEAEDD. Furthermore, DSR has had a full opportunity since November 12, 2020 to review the evidence that was submitted with LPPC's Feeder Application. However, rather than do so, DSR delayed taking action until late January to retain new attorneys, whose firm has long been acquainted with the deplorable condition of DSR's line of railroad between McGehee, Arkansas and Tallulah, Louisiana. See various abandonment proceedings cited in LPPC's Feeder Application at pp. 6-7. Finally, as the Board will see from a review of the confidential emails and other documents, DSR's employees were parties to an overwhelming majority of them. It must be emphasized that LPPC, SEAEDD and NLA have collectively spent several hundred hours searching for these documents which DSR has had in its possession from the outset. Under these circumstances, one must question DSR's motives in seeking to extend discovery for any reason.

In closing, the Board is urged to establish a new procedural schedule that will allow the proceeding to be finalized. It is respectfully submitted that nothing is to be gained from further delay.

Respectfully submitted,

/s/ Richard H. Streeter

Richard H. Streeter
Attorney for Lake Providence Port
Commission, Southeast Arkansas
Economic Development District,
Madison Parish Port Commission; and
North Louisiana & Arkansas Railroad

RHS:rs

cc: Thomas J. Healey, Counsel for Delta Southern Railroad

All other parties of record