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March 22, 2019

Mr. William Brennan
Director, Office of Economics
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

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RE: WB17-44; Request for Renewal of Waybill Access

Dear Director Brennan:

On April 17, 2018, the Office of Economics granted in part Waybill Request WB17-44 to allow Thompson Hine LLP, Economists, Inc., and L.E. Peabody & Associates, Inc. (collectively "Requestors")¹ limited access to the confidential Carload Waybill Sample (CCWS) for the purpose of developing, evaluating, and proposing alternatives to the Board's Stand-Alone Cost (SAC) standard. The details of that request are contained in a letter addressed to you dated October 20, 2017. The access granted expires on April 30, 2019. The Requestors hereby seek an extension of this Agreement through April 30, 2020.

The requested extension is necessary to enable Requestors to continue to develop, evaluate, and propose an alternative to SAC. Specifically, Requestors are using the CCWS to develop an econometric model as part of a rate benchmarking standard that could become an alternative to SAC. They are currently testing and refining this model, which is a complex, time-consuming process. Without continued access to the CCWS, Requestors will not be able to complete development of the model.

For the foregoing reasons, Requestors request an extension of Waybill Agreement WB17-44 to April 30, 2020.

Best regards,


Jason D. Tutrone

¹ On September 10, 2018, Requestors submitted new Undertakings for individuals who had relocated from Economists, Inc. to EconOne Research. Therefore, all references to "Requestors" in this letter substitute EconOne for Economists, Inc.