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July 7, 2017

ENTERED
Office of Proceedings
July 7, 2017
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Public Record

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

Re: Alloy Property Company, LLC – Adverse Abandonment – Chicago Terminal
Railroad In Chicago, IL, Docket No. AB-1258

Dear Ms. Brown:

On July 6, 2017, Chicago Terminal Railroad (“CTR”) filed a letter in the above-referenced proceeding stating that it would be “premature” for the Board to decide the Petition for Partial Waiver of Abandonment Regulations and for Exemption (“Petition”) that Alloy Property Company, LLC (“Alloy”) filed on June 1, 2017. CTR’s argument that the Board should delay ruling on the Petition was not made in CTR’s June 21, 2017 Response to the Petition, and Alloy respectfully requests leave to submit the following response to that new argument.

Alloy does not believe there are any grounds for the Board to delay action on the Petition. On the contrary, the Board’s resolution of the Petition is a necessary first step in this proceeding; neither an abandonment application nor a notice of intent to file an application can be prepared until the Board resolves the Petition. Alloy’s willingness to meet with CTR to discuss the status of the Line is no reason for the Board to delay consideration of a Petition that has been fully briefed and is ripe for decision. The Board should decide the mostly-uncontested issues in the Petition expeditiously.

Sincerely,

Matthew J. Warren
Counsel to Alloy Property Company, LLC

cc: Service List