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

Re: Docket No. EP 745, *Petition for Investigation and Establishment of Rules to Govern Public Access and Availability of Agency Library Materials* – Letter of Support

Dear Ms. Brown:

The Western Coal Traffic League (“WCTL”)¹ submits this letter in support of Thomas F. McFarland and Gordon P. MacDougall’s *Petition for Investigation and Establishment of Rules to Govern Public Access and Availability of Agency Library Materials* (“Petition for Investigation” or “Petition”), filed on January 24, 2018. There are several reasons why the Surface Transportation Board (“STB” or “Board”) should grant the Petition and stay any current Board directives concerning the destruction of ICC records to the National Archives and Records Administration (“NARA”), pending the outcome of the requested investigation.

As Messrs. McFarland and MacDougall note, “[f]actual changes, and future threats to adequate library facilities hinder efforts to carry out the goals of STB transportation regulation.” Petition at 4. WCTL has similar concerns regarding the library’s current state, particularly: the lack of an adequately trained librarian;²

¹ WCTL is a voluntary association, comprised of shippers of coal mined west of the Mississippi River and transported by rail.

² Petition at 4-5.

discontinuance and removal of key resources and plans for continued downsizing;³ transfer in library management from the Office of General Counsel to the Office of Public Assistance, Government Affairs and Compliance (OPAGAC);⁴ and reduced public access.⁵

Because of the foregoing concerns, and others outlined in the Petition, WCTL supports Messrs. McFarland and MacDougall's request for an investigation into the Board's public library. Specifically, we ask that the Board examine:

1. The current library rules (available at 49 C.F.R. § 1001.1), particularly:
 - a. Whether such rules are presently being followed; and
 - b. Whether such rules should be revised, supplemented, or otherwise amended;
2. The ability of OPAGAC personnel to manage the library;
3. The potential negative effects of merging the library room with the public docket room; and
4. Any other features for the library that may be appropriate.

WCTL respectfully urges the Board to act promptly and grant the Petition for Investigation in all respects.

Sincerely yours,


William L. Slover
A. Rebecca Williams
Attorneys for WCTL

³ E.g., pre-1940 issues of *Traffic World* magazine, all Titles other than Title 49 of the Code of Federal Regulations, and "advance bulletins" to the ICAA issued after 1977. *Id.* Additional resources will likely be removed, as evidenced by a notice posted by NARA in the Federal Register announcing that certain ICC documents, dated 1887-1924, will not continue to be preserved. *Id.* at 6 (citing 82 Fed. Reg. 61336, 61337 (Dec. 27, 2017)).

⁴ *Id.* at 5.

⁵ *Id.* at 7; see also Inquiries: Library, STB (Jan. 31, 2018), https://www.stb.gov/stb/public/inquiries_library.html ("The [STB] Library is open to the public from 10:00 A.M. to 3:00 P.M. . . . Although the library is open on a walk-in basis, patrons are strongly encouraged to call ahead to schedule an appointment during these hours.").

CERTIFICATE OF SERVICE

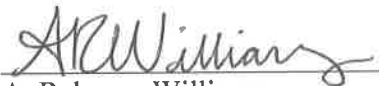
I certify that on this 22nd day of February, 2018, I served copies of the foregoing Letter of Support for Docket No. EP 745, *Petition for Investigation and Establishment of Rules to Govern Public Access and Availability of Agency Library Materials*, upon all parties of record in this proceeding by e-mail:

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