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October 31, 2019

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Allison C. Davis
Director
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Notice of Intent to Participate, *Railroad Revenue Adequacy*, Dockets
No. Ex Parte 761, Ex Parte 722

Dear Ms. Davis:

Pursuant to the Board's September 12, 2019 order in the above-captioned proceeding, Professor Joseph P. Kalt, Ford Foundation Professor (Emeritus) of International Political Economy at the Harvard University John F. Kennedy School of Government, and Raymond A. Atkins, Ph.D., of Sidley Austin LLP, submit this notice of intent to participate in the public hearing scheduled for December 12, 2019. They will present testimony on behalf of the Association of American Railroads and request thirty (30) minutes.

Professor Kalt and Mr. Atkins will address the Rate Reform Task Force's recommendations regarding revenue adequacy, including proposals regarding the calculation of long-term revenue adequacy and the proposed changes to the regulatory framework if a carrier is found to be long-term revenue adequate.

Sincerely,

/s/ Raymond A. Atkins

Raymond A. Atkins