

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

248709

ENTERED
Office of Proceedings
October 31, 2019
Part of
Public Record

Docket No. EP 760

EXCLUSION OF DEMURRAGE REGULATION FROM CERTAIN CLASS EXEMPTIONS

Notice of Proposed Rulemaking

**COMMENTS FROM THE PRIVATE RAILCAR FOOD AND BEVERAGE
ASSOCIATION (PRFBA)**

First and foremost, we would like to thank the Surface Transportation Board (Board) for the extensive work it has put into this matter, not only into the creation of these decisions but into the hearing itself.

The Board's decision on exclusion of demurrage regulations from certain class exemptions is extremely helpful to the members of PRFBA. By including boxcars and agricultural commodities in this decision the Board has provided all PRFBA members the benefits of your oversight in demurrage liability.

We thank the board for this rule making change and clarification and appreciate your efforts to pass this proposed rulemaking as quickly as possible.

Prepared October 30, 2019 by:

Herman Haksteen
President,
Private Railcar Food and Beverage Association, Inc.
hhaksteen@prfba.org