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Surface Transportation Board
395 E Street SW
Washington, DC 20423
Via e-Filing

Notice of Intent to Participate

Ex Parte No. 761 & 722– Hearing on Railroad Revenue
Adequacy

The American Chemistry Council (ACC) hereby notifies the Board of its intent to participate in the hearing to be held on December 12, 2019. As part of our testimony, ACC intends to present the details of a proposed alternative rate reasonableness methodology that is designed to implement the revenue adequacy constraint in Coal Rate Guidelines. We request 30 minutes.

The following speakers will present testimony:

- Jeffrey Sloan, ACC
- Dr. Kevin Caves, Econ One Research, Inc.
- Jeffery Moreno, Thompson Hine, LLP

ACC appreciates this opportunity to provide testimony to the Board. Please contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in grey ink that reads "Jeffrey Sloan".

Jeffrey Sloan
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