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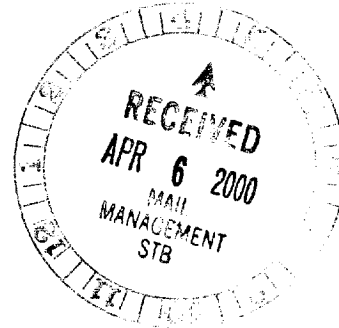
- Rubenstein Freight Transportation Consultants
- S-R-F-T-C Brokers
- Supply Chain Solutions

Bruce D. Hocum, President

April 4, 2000

Ms. Linda J. Morgan, Chairman
The Surface Transportation Board
1925 K Street, N.W., Suite 600
Washington, DC 20423-0001

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Office of the Secretary
APR 07 2000
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Re: National Classification Committee-Agreement,
Section 5a Application No. 61 (Sub No. ~~61~~).

Dear Chairman Morgan:

My name is Bruce D. Hocum, President of Rubenstein Logistic Services, Inc. at 6960 Madison Avenue West, Golden Valley, Minnesota 55427. I have been appearing before the National Classification Committee (NCC) since the mid 1970's. In the past 4-5 years there have been various shipper organizations and attorneys that have suggested that we move to a different classification system. I have personally been involved with these discussions at trade shows and other meetings and whenever I asked the question "What are we going to replace it with?" I get no answers. All we get is that there needs to be a better system. The old saying is that if the system is not broke let's not fix it. I can tell you first hand that the individuals working for this organization are extremely helpful and will bend over backwards to assist me in any way possible. Not only is the staff extremely capable, there are occasions when I will contact the NCC carriers direct and ask for their assistance. These carriers also are extremely helpful to us.

When I review the docket service that the NCC publishes every three months and I see a proposal that will affect a client, I contact my client and ask if they belong to an association. The reason being is that if they belong to an association and we can get the association involved, then we can give the NCC far better data than I can representing one client. I have found from experience that the more data we can provide to the NCC, the better the results.

One of the most frequently asked question is, "Can you make sure that this data is held in confidence". In other words since I am representing one shipper member of an association, that member does not want that data shared with other members of the association. They do not want the dimensions, weight, price or any other characteristics of their products discussed with or revealed to competing interests. Normally this is highly confidential data and in all of these past years I have never had any leaks in this information.

If the NCC is required to have shippers appear on the panel or in some format they determine, then I will not want to share my clients or associations data that shows all of this critical information. I can't possibly see how having shipper representation on the NCC can accomplish anything. This will do nothing more than muddy up the water.

I have been asked numerous times by Transportation Associations, Transportation Lawyers, and our clients what I could recommend to improve the present NCC. So far I have not been able to suggest any improvements. In my experience I have found shippers to have unrestricted opportunities to participate in the classification system. The system is fair and equitable and as long as the facts are represented, the system works great.

If I can be of further assistance, please contact me at any time.

Yours very truly,


Bruce D. Hocum
President

cc: Partial of Record

BDH/cs