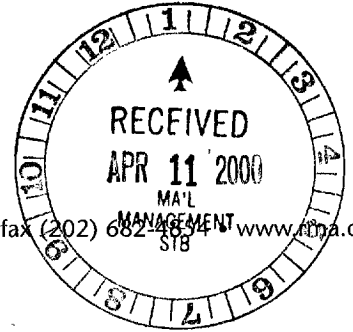




RUBBER
manufacturers
association

1400 K Street, NW • Washington, DC 20005 • tel (202) 682-4800 • fax (202) 682-4894 • www.rma.org



April 11, 2000

The Surface Transportation Board
Office of the Secretary
Case Control Unit
1925 K Street N.W.,
Washington, D.C. 20423

BY MESSENGER

ENTERED
Office of the Secretary

APR 12 2000

**Part of
Public Record**

Re: Section 5a Application No. 61 (Sub-No.6)
National Classification Committee - Agreement

The Rubber Manufacturers Association (RMA) is the national trade association for the rubber products industry, a \$50 billion manufacturing sector employing more than 650,000 people in the United States. The Association represents more than 125 companies manufacturing a wide variety of rubber products.

RMA and its individual members have had many years of experience in dealing with the National Classification Committee (NCC). Most recently RMA and its member companies responded to a proposed docket heard on November 9, 1999 concerning rubber hose and NMFC Item 100120. RMA prevailed during the hearing but the proceedings demonstrated the problems with the current classification system, and the need for reform.

RMA joins with other shipper groups including National Small Shipments Traffic Conference, Inc.(NASTRAC) and The Health and Personal Care Distribution Conference in expressing our concerns regarding the current classification process, and calling for reform. An ideal world would give shippers complete access to data and NCC analysis prior to any proceeding. As important would be the opportunity for shipper input prior to and during the proceedings. These two small steps were missing from RMA's past experience with the NCC and would be necessary to have fair and open proceedings. Additional reforms are also needed if the NCC is to be allowed to retain its antitrust immunity. The National Motor Freight Classification and the NCC can provide a useful service, but only if the current bias in favor of the trucking industry is eliminated. The comments offered by all the major shipper groups focus on the need to move toward that ideal.

RMA appreciates the opportunity to present its views to the Surface Transportation Board and will closely monitor these proceedings as they progress.

Sincerely,

A handwritten signature in cursive script that reads "Ann Wilson".

Ann Wilson

Vice President

Government Affairs

CERTIFICATE OF SERVICE

I hereby certify that I have this 11th day of April, 2000,
caused the foregoing document to be served on all parties of
record in this proceeding by first class mail, postage prepaid.

Ann Wilson
Ann Wilson

