

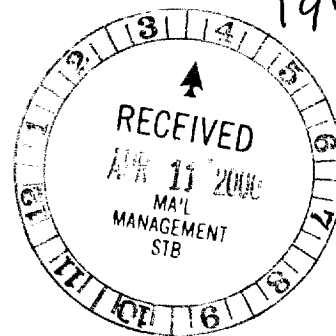
ORIGINAL

ENTERED
Office of the Secretary

APR 12 2000

Part of
Public Record

Before the
SURFACE TRANSPORTATION BOARD



Section 5a Application No. 55
(Amendment No. 2)

MOTOR CARRIERS TRAFFIC ASSOCIATION-AGREEMENT

OPENING COMMENTS

GORDON P. MacDOUGALL
1025 Connecticut Ave., N.W.
Washington DC 20036

Attorney for Motor Carriers
Traffic Association

Due Date: April 11, 2000

Before the
SURFACE TRANSPORTATION BOARD

Section 5a Application No. 55
(Amendment No. 2)

MOTOR CARRIERS TRAFFIC ASSOCIATION-AGREEMENT

OPENING COMMENTS

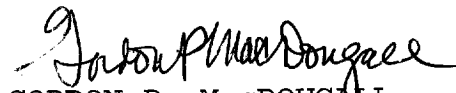
Motor Carriers Traffic Association (MCTA), which has pending a motor carrier rate bureau renewal application, submits these opening comments in response to the February 4, 2000 (served February 11) notice published by the Surface Transportation Board (Board). 65 Fed. Reg. 7099 (Feb. 11, 2000).^{1/}

MCTA has been in existence for many years, and was approved by the former Interstate Commerce Commission (ICC). Motor Carriers Traffic Assn., Inc.-Agreement, 301 I.C.C. 781 (1957). The MCTA agreement since has been amended over the years, as set forth in its pending renewal application, filed in December 1998.

The attached verified statement of B.F. Moffitt provides supplemental information in support of the renewal application.

Respectfully submitted,

^{1/} MCTA is named in the February 11, 2000 notice, although the word "Motor" is missing (apparently inadvertently) from the footnote.



GORDON P. MacDOUGALL
1025 Connecticut Ave., N.W.
Washington DC 20036

April 11, 2000

Attorney for Motor Carrier
Traffic Association

Before the
SURFACE TRANSPORTATION BOARD

Section 5a Application No. 55
(Amendment No. 2)

MOTOR CARRIERS TRAFFIC ASSOCIATION-AGREEMENT

VERIFIED STATEMENT OF B.F. MOFFITT

My name is B.F. Moffitt, with offices at 2701 S. Elm Eugene Street, Greensboro, NC 27406.^{1/} I am the same person of the same name that submitted a verified statement, dated December 18, 1998, in this proceeding in support of the request by Motor Carriers Traffic Association (MCTA) for renewal of its motor carrier rate bureau agreement. I continue to serve as President of MCTA.

The character and workings of MCTA are unchanged since my December 18, 1998 verified statement. I know of no complaints concerning MCTA since my earlier verified statement. MCTA continues to be a small organization, consisting of small and medium size carriers. An important segment of our carriers handle predominantly new less-than-truckload furniture, while other general commodity carriers handle less truckload and other freight.

I have read the notice issued February 11, 2000 by the Board inviting proposals and comments concerning "market based rates," and I have read the accompanying decision in Sec. 5a Application

^{1/} Our mailing address is: P.O. Box 1500, Greensboro NC 27402.

No. 118 (Amendment No. 1), Et al., EC-MAC Motor Carriers Service Association, Inc., ET AL. ^{2/} I have also reviewed the December 18, 1998 decision by the Board in the latter proceeding, concerning procedures looking toward the reduction of so-called "benchmark" rates.

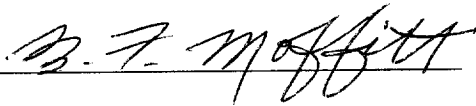
1. Class Rates. MCTA publishes a class rates tariff. (555 series). These rates for the most part, for competitive reasons, tend to be the same as the class rates published by the Southern Motor Carriers (SMC). There is a 20 percent discount in this class tariff for customers not having a discount; this is similar to that which SMC has in effect. Our carrier membership is minuscule in comparison with SMC, such that MCTA cannot deviate from the SMC rates for any substantial period of time.

2. Commodity Rates. MCTA publishes a commodity tariff for new furniture, embracing both less truckload and truckload shipments. (202 series). These rates for all practical purposes are lower than the class rates. There is no other Bureau, to our knowledge, having a new furniture tariff in our territory; however, there are a number of individual carrier tariffs which may contain rates lower or higher than our rates.

^{2/} MCTA's request for renewal is not included among the seven named applications embraced in the February 11, 2000 decision in Sec. 5a Application No. 118 (Amendment No. 1). However, MCTA is named in the February 11, 2000 notice, although the word "Motor" is missing (apparently inadvertently) from the footnote.

VERIFICATION

Under the penalties of perjury, I affirm the foregoing is true and correct as stated.


B.F. MOFFITT

Dated at
Greensboro, NC
April 11, 2000