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ORIGINAL

Before the
SURFACE TRANSPORTATION BOARD



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

MOTOR CARRIERS TRAFFIC ASSOCIATION-AGREEMENT

ENTERED
Office of the Secretary

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REPLY COMMENTS

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Attorney for Motor Carriers
Traffic Association

Due Date: May 11, 2000

Before the
SURFACE TRANSPORTATION BOARD

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MOTOR CARRIERS TRAFFIC ASSOCIATION-AGREEMENT

REPLY COMMENTS

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

1. Background. There have been no objections to MCTA's December 1998 request for renewal, and no objections against MCTA in response to the Board's February 11, 2000 invitation for the public do to so on or before April 11, 2000. Indeed, the only filing specifically addressed to MCTA is that separately filed April 11 by Raynard F. Bohman Jr., and is in support of MCTA.^{2/}

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

^{2/} Although Mr. Bohman's separately-filed verified statement represents his own comments and opinions, and do not necessarily reflect that of his clients, he serves as managing director for the International Furniture Transportation and Logistics Council, Inc. (formerly named the National Furniture Traffic Conference Inc., from June 1926 to December 31, 1999). (Bohman Stmt., p. 1).

2. Other Responses. The Board's proceeding in the rate bureau agreements involved seven principal bureaus.^{3/} Some additional seven bureaus, including MCTA, became involved at the time of the December 31, 1998 deadline.^{4/} The April 21, 2000 Board directive deleted two bureaus from this proceeding, apparently for separate handling.^{5/}

MCTA does not oppose the continued operation of the other 11 bureaus involved in this proceeding. The comments filed by these other bureaus do not mention, and do not appear directed, to the operations of MCTA. Our examination of five the non-carrier filings indicate they likewise are not directed to MCTA, except for one--Bowman Industrial Traffic Consultants--which supports MCTA.

However, the tenor of some of the non-carrier objectors, suggests that MCTA, out of an abundance of caution, clarify its situation, and make its position perfectly clear. Attached hereto is the reply verified statement of B.F. Moffitt, President of MCTA.

Respectfully submitted,


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

Attorney for Motor Carriers
Traffic Association

May 11, 2000

3/ See: EC-MAC Motor Carriers Service Association, Inc., ET AL.,
decisions served December 18, 1998, and February 11, 2000.

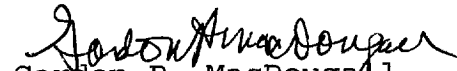
4/ See: EC-MAC Motor Carriers Service Association, Inc., ET AL.,
(served December 29, 1999).

5/ These are: Household Goods Carriers Bureau Committee; National
Bus Traffic Association.

CERTIFICATE OF SERVICE

I hereby certify I have served a copy of these reply comments upon all parties listed to be served by the Board in its April 21, 2000 decision, by first class mail postage-prepaid.

Washington DC


Gordon P. MacDougal

Before the
SURFACE TRANSPORTATION BOARD

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

MOTOR CARRIERS TRAFFIC ASSOCIATION-AGREEMENT

REPLY VERIFIED STATEMENT OF B.F. MOFFITT

My name is B.F. Moffitt. I am the same person of the same name that submitted a verified statement, dated April 11, 2000, as part of our Opening Comments.

Motor Carriers Traffic Association (MCTA) remains a small organization, consisting of small and medium size carriers, with an important segment of our carriers handling predominantly new less-than-truckload furniture, while other general commodity carriers handle less truckload and other freight.

I have read each of the opening comments and submissions made by the parties shown by the Board in the Board's April 21, 2000 decision setting forth the service list. Only one of these filings mentions MCTA--Bohman Industrial Traffic Consultants, Inc.--and it is in strong support of continued anti-trust immunity for MCTA.

However, the tenor of some of the non-carrier filings prompt this reply verified statement, so that MCTA's position may be absolutely clear.

MCTA's class rates for the most part track those of Southern Motor Carriers Rate Conference (SMC), including discounts, as set

forth in my opening verified statement, at p. 2. MCTA maintains even lower commodity rates for furniture shipments, as also described in my opening verified statement, at p. 2.

Attached as Statement A is a schedule indicating a comparison of baseline class rates in our tariff 555 series with those of SMC, which indicates a similarity of base line rates. MCTA, as does SMC, bases rates on a distance using the three-digit U.S. postal zip code areas in the class tariff. (SMC Opening Comments, Ridley Stmt. p. 4). General rate increases acted upon by the general rate committee are uniformly applied across the Board. Carriers do discount these class rates from a low of 20 percent to about 65 percent. MCTA publishes a 20 percent discount in the class tariff, for customers not having a discount similar to what SMC has in effect. As indicated in my opening verified statement, the MCTA carriers are minuscule in comparison with SMC carriers, but in order to stay in business for any length of time MCTA's class rates must be competitive with carriers in the SMC. According to my most recent available information, our MCTA carriers have an operating ratio of about 96.4%.

Attached as Statement B is a schedule concerning MCTA's Furniture tariff 202 series, a commodity tariff for which there is no other bureau in our territory to make comparisons. Statement B gives a practical comparison of baseline rates in Furniture tariff 202 with baseline rates in MCTA class tariff 555.

There are many different descriptions of furniture in the National Motor Freight Classification (NMFC), while MCTA's furniture tariff is broken down into four different descriptions. Furniture tariff 202 covers list 175 (upholstered furniture) and

list 150, naming certain types of furniture with no or minimal packing requirements, and carry the same rate.

A comparison of MCTA furniture list 175 with class 175 in the NMFC, which governs the MCTA class tariff 555, and also the SMC tariff, for representative origins of Hickory and High Point, NC, indicates the Furniture tariff 202 rates are substantially lower than the MCTA class tariff 555. This also true for furniture articles in list 125, such as buffets, etc., when compared with rating 125 in the NMFC, and also for list 100 in tariff 202 with class 100 in NMFC applied to rates in MCTA class tariff 555.

As indicated by Statement B, most of MCTA's furniture rates are much lower than the class rates.

Finally, I desire to endorse the support given MCTA in the statement of Raynard F. Bohman Jr. He correctly points out that many of the smaller carriers that the furniture industry depends upon are struggling financially, with some going out of business, and that without a bureau such as MCTA they would have a very, very difficult time in implementing needed increases or surcharges. This statement from the furniture industry comports with my everyday observations from a carrier viewpoint. I recommend that the Board give very careful consideration to Mr. Bohman's statement concerning the needs of the furniture industry, and the needs of its carriers, in continuing MCTA's anti-trust immunity.

STATEMENT A

BASE CLASS RATE COMPARISON MCTA WITH SMC
RATES IN CENTS PER HUNDRED POUNDS

FROM: CHARLOTTE, NC (282)

TO:	3 DIGIT ZIP CODE	TERRITORY	CLASS	WEIGHT GROUP	SMC	MCA
ATLANTA, GA	303	SOUTH	70	M5C	3043	3043
BALTIMORE, MD	212	EAST	100	L5C	5698	5698
BOSTON, MA	021	EAST	92.5	M1M	5066	5066
COLUMBIA, SC	292	SOUTH	85	L5C	2940	2940
JACKSONVILLE, FL	322	SOUTH	65	M2M	1998	1998
MEMPHIS, TN	381	SOUTH	100	M5M	2950	2950
PHILADELPHIA, PA	191	EAST	60	M5C	3842	3842
RICHMOND, VA	232	SOUTH	50	M10M	972	972

FROM: CHARLESTON, SC (294)

TO:	3 DIGIT ZIP CODE	TERRITORY	CLASS	WEIGHT GROUP	SMC	MCA
ATLANTA, GA	303	SOUTH	70	M5C	3287	3287
BALTIMORE, MD	212	EAST	100	L5C	6272	6272
BOSTON, MA	021	EAST	92.5	M1M	5511	5511
COLUMBIA, SC	292	SOUTH	85	L5C	3096	3096
JACKSONVILLE, FL	322	SOUTH	65	M2M	1596	1596
MEMPHIS, TN	381	SOUTH	100	M5M	3036	3036
PHILADELPHIA, PA	191	EAST	60	M5C	4019	4019
RICHMOND, VA	232	SOUTH	50	M10M	1123	1123

FROM: GREENSBORO, NC (274)

TO:	ZIP CODE	TERRITORY	CLASS	WEIGHT GROUP	SMC	MCA
ATLANTA, GA	303	SOUTH	70	M5C	3532	3532
BALTIMORE, MD	212	EAST	100	L5C	5241	5241
BOSTON, MA	021	EAST	92.5	M1M	4665	4665
COLUMBIA, SC	292	SOUTH	85	L5C	3560	3560
JACKSONVILLE, FL	322	SOUTH	65	M2M	2370	2370
MEMPHIS, TN	381	SOUTH	100	M5M	3075	3075
PHILADELPHIA, PA	191	EAST	60	M5C	3491	3491
RICHMOND, VA	232	SOUTH	50	M10M	823	823

L5C.....APPLIES ON SHIPMENTS WEIGHING LESS THAN 500 POUNDS.

M5C.....APPLIES ON SHIPMENTS WEIGHING 500 LBS. OR MORE BUT LESS THAN 1,000 LBS.

M1M.....APPLIES ON SHIPMENTS WEIGHING 1,000 LBS. OR MORE BUT LESS THAN 2,000 LBS.

M2M.....APPLIES ON SHIPMENTS WEIGHING 2,000 LBS. OR MORE BUT LESS THAN 5,000 LBS.

M5M.....APPLIES ON SHIPMENTS WEIGHING 5,000 LBS. OR MORE BUT LESS THAN 10,000 LBS.

M10M.....APPLIES ON SHIPMENTS WEIGHING 10,000 LBS. OR MORE BUT LESS THAN 20,000 LBS.

SMC.....SOUTHERN MOTOR CARRIERS RATE CONFERENCE, INC.

MCA.....MOTOR CARRIERS TRAFFIC ASSOCIATION, INC.

STATEMENT B

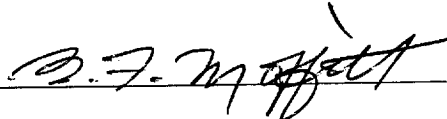
**COMPARISON OF BASING RATES IN MCTA CLASS TARIFF 555 WITH MCTA TARIFF 202 (COMMODITY)
RATES IN CENTS PER HUNDRED POUNDS**

FROM:	TO:	WT GROUP	555	202	555	202	555	202	555	202
			CLASS 175	LIST 150- 175	CLASS 150	LIST 150	CLASS 125	LIST 125	CLASS 100	LIST 100
HICKORY, NC R/B 276	ATLANTA, GA	L5C	7912	3083	6811	3083	5710	1865	4644	1784
		M5C	7280	2747	6267	2747	5254	1865	4273	1784
		M1M	5460	2682	4701	2682	3941	1865	3205	1784
		M2M	4193	2322	3610	2322	3026	1825	2461	1740
HICKORY, NC R/B 778	MIAMI, FL	L5C	11599	5460	9985	5460	8371	3216	6808	3110
		M5C	10672	4892	9187	4892	7702	3216	6264	3110
		M1M	8351	4775	7189	4775	6027	3216	4902	3110
		M2M	6843	4178	5891	4178	4939	3144	4016	3043
HIGH POINT, NC R/B 546	BIRMINGHAM, AL	L5C	10042	4456	8645	4456	7248	2635	5894	2534
		M5C	9239	4003	7954	4003	6668	2635	5423	2534
		M1M	7231	3905	6225	3905	5219	2635	4244	2534
		M2M	5925	3434	5100	3434	4276	2573	3478	2476
HIGH POINT, NC R/B 385	ATLANTA, GA	L5C	9133	3661	7863	3661	6592	2212	5361	2135
		M5C	8402	3278	7233	3278	6064	2212	4932	2135
		M1M	6302	3202	5425	3202	4548	2212	3699	2135
		M2M	4842	2750	4168	2750	3494	2156	2842	2088

L5C.....APPLIES ON SHIPMENTS WEIGHING LESS THAN 500 POUNDS.
M5C.....APPLIES ON SHIPMENTS WEIGHING 500 LBS. OR MORE BUT LESS THAN 1,000 LBS.
M1M.....APPLIES ON SHIPMENTS WEIGHING 1,000 LBS. OR MORE BUT LESS THAN 2,000 LBS.
M2M.....APPLIES ON SHIPMENTS WEIGHING 2,000 LBS. OR MORE BUT LESS THAN 5,000 LBS.
SMC.....SOUTHERN MOTOR CARRIERS RATE CONFERENCE, INC.
MCA.....MOTOR CARRIERS TRAFFIC ASSOCIATION, INC.
R/B.....RATE BASE NUMBER

VERIFICATION

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


B.F. MOFFITT

Dated at
Greensboro, NC
May 11, 2000