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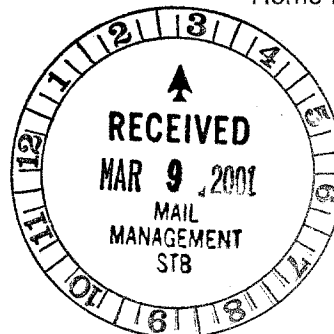
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March 9, 2001

Surface Transportation Board
 Office of the Secretary
 Case Control Unit
 1925 K Street N.W.
 Washington, DC 20423-0001

Re: Ex Parte No. 582 (Sub-No. 1) Oral Argument

Dear Sir or Madam:

I would appreciate the opportunity to participate in the oral argument scheduled on April 5 in Ex Parte No. 582 (Sub-No. 1). I request 3 minutes to offer a brief explanation of the often-significant impact of rail mergers on public port authorities and how the Commission's proposed merger guidelines can address the issue.

Sincerely,

Jean C. Godwin

Executive Vice President and General Counsel