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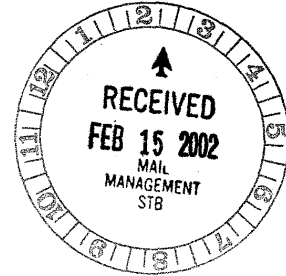
WRITER'S E-MAIL:

February 15, 2002

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BY HAND DELIVERY

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
Case Control Unit
1925 K Street, N.W.
Washington, D.C. 20423-0001



Re: STB Ex Parte No. 290 (Sub-No. 4)
Railroad Cost Recovery Procedures -
Productivity Adjustment

Dear Secretary Williams:

Enclosed please find an original and ten (10) copies of the Comments of the Western Coal Traffic League in the above-referenced proceeding.

If there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

Robert D. Rosenberg

Robert D. Rosenberg
An Attorney for Western
Coal Traffic League

ENTERED
Office of the Secretary

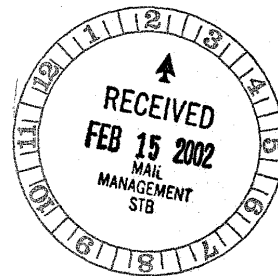
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RDR:kaw
Enclosures

cc: Service List

BEFORE THE
SURFACE TRANSPORTATION BOARD



In the Matter of:)

RAILROAD COST RECOVERY)
PROCEDURES - PRODUCTIVITY)
ADJUSTMENT)

Ex Parte No. 290 (Sub-No. 4)

COMMENTS OF THE WESTERN COAL TRAFFIC LEAGUE

WESTERN COAL TRAFFIC LEAGUE

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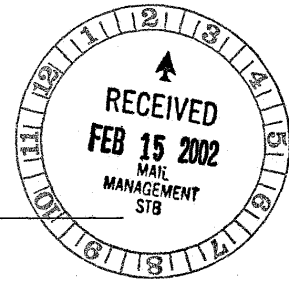
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Public Record

Dated: February 15, 2002

BEFORE THE
SURFACE TRANSPORTATION BOARD



In the Matter of:)

RAILROAD COST RECOVERY)
PROCEDURES - PRODUCTIVITY)
ADJUSTMENT)

Ex Parte No. 290 (Sub-No. 4)

COMMENTS OF WESTERN COAL TRAFFIC LEAGUE

In response to the Board's decision in the above-captioned proceeding served February 1, 2002, the Western Coal Traffic League ("WCTL")¹ states that the Board's calculation of 2000 productivity growth at 1.082 is consistent with WCTL's own calculations.

Nonetheless, WCTL remains concerned that the 1996-2000 five-year productivity average proposed for use starting with the RCAF for the second quarter of 2002 remains tainted by problems associated with recent railroad mergers. The only reason that the Class I railroad industry productivity declined by 1.3% in 1998, and by 1.2% in 1997, which years are reflected in the proposed 1996-2000 average, was the "service crisis" that UP experienced in conjunction with its acquisition of SP. WCTL specifically warned the Board of the problems posed by the UP/SP

¹WCTL is a voluntary association, whose regular membership consists entirely of utility shippers of coal mined West of the Mississippi River that is transported by rail. WCTL members presently ship and receive in excess of 100 million tons of coal by rail each year. A list of WCTL's regular members is attached as Exhibit A.

merger in light of the operational constraints that UP was already experiencing in comments filed in Finance Docket No. 32760 on March 29, 1996 (WCT-11 and 12). Similarly, 1999 showed a modest (2.5%) increase from the depressed level of 1998. That increase would have been substantially greater but for the problems of Norfolk Southern and CSXT in the Conrail transaction.

The 2000 data does shows a substantial (8.2%) increase from 1999, the largest improvement in four years. WCTL submits that, absent the problems associated with the UP/SP merger and NS/CSXT/Conrail transaction, much of the growth in 2000 would have been realized in earlier years and additional productivity growth would have been achieved in 2000 itself, to the net benefit of both shippers and carriers.

Accordingly, WCTL welcomes the return of the multiple-year productivity average (4.2%) to a more appropriate level, but urges all to note that the level would not have fallen so low absent the merger problems of the railroad industry.

Respectfully submitted,

WESTERN COAL TRAFFIC LEAGUE

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Dated: February 15, 2002

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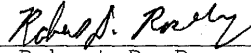
EXHIBIT A

WESTERN COAL TRAFFIC LEAGUE

Alliant Energy
Arizona Electric Power Cooperative, Inc.
Associated Electric Cooperative, Inc.
Central Louisiana Electric Company, Inc.
City of Austin, Texas
City Public Service Board of San Antonio
Kansas City Power & Light Company
Lower Colorado River Authority
MidAmerican Energy Company
Minnesota Power
Nebraska Public Power District
Northern States Power Company
NRG Power Marketing Inc.
Omaha Public Power District
Reliant Energy
Texas Municipal Power Agency
Western Resources, Inc.
Wisconsin Public Service Corporation
Xcel Energy

Certificate of Service

I hereby certify that today, February 15, 2002, copies of the foregoing Comments of the Western Coal Traffic League have been served on all parties of record in this proceeding by first class mail, postage prepaid, in accordance with the Board's Rules of Practice.



Robert D. Rosenberg

Dated: February 15, 2002