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February 20, 2002

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**Delivered by Messenger -- Original and 10 Copies**

The Honorable Vernon A. Williams

Secretary

Surface Transportation Board

1925 K Street, N.W.

Washington, D.C. 20423-0001

Re: STB Finance Docket No. 33928, Norfolk Southern Corporation and
Norfolk Southern Railway Company - Construction and Operation - In
Indiana County, PA

Dear Secretary Williams:

Applicants Norfolk Southern Corporation and Norfolk Southern Railway Company ("NS") yesterday received a copy of a "Petition" by Horst E. Kunig, Ph. D., President, Kunig, Inc., submitted to the Surface Transportation Board in connection with the NS Application for Construction and Operation - In Indiana County, PA ("Application") pending before the Board in the above-referenced docket. The Petition bears the date February 12, 2002.

All comments on the December 27, 2001 Application were required to be filed with the Board by January 31, 2002 and a copy concurrently served upon Applicants. See, STB Finance Docket No. 33928, Norfolk Southern Corporation and Norfolk Southern Railway Company - Construction and Operation - in Indiana County, PA (served January 22, 2002). Mr. Kunig's Petition was not filed within the designated timeframe and was not received by Applicants until February 19, 2002, fully 19 days after the close of the comment period established by the Board. Mr. Kunig did not previously request an extension of the deadline for submitting comments.

NS now requests that the Board grant NS until February 28, 2002 in which to review and reply to Mr. Kunig's comments. On the basis of the January 31, 2002 public comments closure date and the February 5, 2002 reply date established by the Board, NS on February 5, 2002 filed its reply to the sole set of comments submitted to the Board within the January 31, 2002 deadline. NS in-house and outside counsel have pre-existing professional obligations which will require them to be out of town for several days, and thus a reply date of February 28, 2002 is requested. Upon receipt of Mr. Kunig's Petition yesterday, NS notified the

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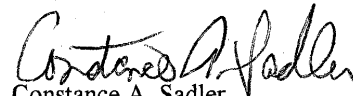
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Board's Office of Proceedings by telephone to inform it that NS would request the additional time for submission of a reply.

I may be reached at the above-listed telephone number is you have any questions regarding this request.

Respectfully submitted,


Constance A. Sadler

cc: Joseph H. Dettmar, Office of Proceedings
Victoria J. Rutson, Chief, SEA
Phillis Johnson-Ball, SEA
John V. Edwards

Service List (encl.)

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of February, 2002, I have caused to be served a true and correct copy of the foregoing request for additional time to reply to Petition of Horst E. Kunig, Ph.D. filed by Norfolk Southern Corporation and Norfolk Southern Railway Company in Finance Docket No. 33928 to the persons on the attached list by first-class mail or more expedient service.

A handwritten signature in black ink, appearing to read "Constance A. Sadler", written over a horizontal line.

Constance A. Sadler

Dated: February 20, 2002

Service and Copy List

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