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March 19, 2002

BY HAND

Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Room 715
Washington, D.C. 20423



Re: Finance Docket No. 33942 (Sub-No. 1)
USX Corporation -- Control Exemption -- Transtar, Inc.

Dear Mr. Williams:

Enclosed for filing are the original and ten copies of the Motion For An Extension Of Time of Tracks Traffic and Management Services, Inc. ("TTMS"). The motion seeks an extension of time for TTMS to file a petition for review of an arbitration award under the *New York Dock* employee protective conditions. Pursuant to the Board's regulations, 49 C.F.R. § 1002.2, I enclose my firm's check in the amount of \$150.00 to cover the filing fee for this proceeding.

An additional copy of the motion is enclosed for acknowledgment of receipt. Please date-stamp the copy and return it to our messenger. Thank you for your attention.

Very truly yours,

Krista L. Edwards

*Attorney for Tracks Traffic and
Management Services, Inc.*

ENTERED
Office of the Secretary

MAR 19 2002

Part of
Public Record

Enclosures

cc: Mitchell M. Kraus

SURFACE TRANSPORTATION BOARD

Finance Docket No. 33942 (Sub-No. 1)



USX CORPORATION--CONTROL EXEMPTION--TRANSTAR, INC.

MOTION FOR AN EXTENSION OF TIME

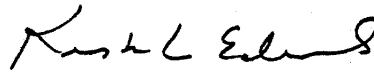
Tracks Traffic and Management Services, Inc. ("TTMS"), pursuant to 49 C.F.R. § 1115.8, requests a twenty-day extension of time, to and including April 9, 2002, in which to file a petition for review of an arbitration award rendered on February 28, 2002, under Article I, § 11 of the *New York Dock* conditions.

The arbitration proceeding arose out of a dispute between TTMS and the Transportation Communications International Union ("TCU") concerning the eligibility of certain clerical employees of TTMS for treatment as "displaced employees" under the *New York Dock* conditions as applied to the acquisition by USX Corporation of control of Transtar, Inc. The Surface Transportation Board granted an exemption from prior approval requirements for that acquisition in a decision served November 30, 2000. TTMS is a subsidiary of Transtar, Inc. TTMS and TCU agreed to submit their dispute to an arbitration board under Article I, § 11 of *New York Dock*, agreed on the selection of John C. Fletcher as chairman and neutral member of the board, and agreed that Mr. Fletcher would render an award on behalf of the board.

The February 28, 2002 award (the "Fletcher award") sustains a claim by TCU, and TTMS is aggrieved by the award. TTMS first consulted outside counsel on March 15, 2002, with respect to a possible appeal from the Fletcher award, and retained counsel yesterday, March 18, 2002. TTMS' counsel has had no prior involvement with this arbitration proceeding.

Under § 1115.8 of the Board's rules, TTMS' petition for review is due to be filed on March 20, 2002. It would not be feasible for TTMS' newly retained counsel to prepare a petition for review of the Fletcher award in this brief period. Counsel believes that an additional twenty-day period, through April 9, 2002, will be necessary. Accordingly, TTMS respectfully requests that the Board grant such an extension, as the Board regularly has done in similar situations in other cases. *E.g.*, Finance Docket No. 29430 (Sub-No. 21), *Norfolk Southern Corp. -- Control -- Norfolk & Western Ry. and Southern Ry.*, served September 9, 1999; Finance Docket No. 32479, *Caddo Antoine & Little Missouri R.R. -- Feeder Line Acquis. -- Arkansas Midland R.R.*, served August 30, 1999.

Respectfully submitted,



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*Attorneys for Tracks Traffic and Management
Services, Inc.*

Dated: March 19, 2002

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion For An Extension Of Time has been served by facsimile and first class mail on Mitchell M. Kraus, General Counsel, Transportation Communications International Union, 3 Research Place, Rockville, Maryland 20850, this 19th day of March, 2002.

