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June 13, 2002



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BY HAND DELIVERY

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423-0001

205618

ENTERED
Office of the Secretary

JUN 14 2002

Part of
Public Record

Re: STB Finance Docket No. 33697, National Railroad
Passenger Corporation under 49 U.S.C. § 24308(a) -
Petition for Declaratory Order - Weight of Rail

Dear Secretary Williams:

Enclosed for filing are an original and ten copies of
the "National Railroad Passenger Corporation's Motion for
Extension of Time."

Thank you for your assistance in this matter.

Sincerely,

George W. Mayo, Jr.
Counsel for National Railroad
Passenger Corporation

GWM:jms

Enclosures

cc (w/enc.): The Honorable Linda J. Morgan (courtesy copy)
The Honorable Wayne O. Burkes (courtesy copy)
All Parties of Record

BRUSSELS BUDAPEST LONDON MOSCOW PARIS* PRAGUE* WARSAW

BALTIMORE, MD COLORADO SPRINGS, CO DENVER, CO LOS ANGELES, CA McLEAN, VA NEW YORK, NY ROCKVILLE, MD
WDC - 65976/0002 - 1513363 v2

*Affiliated Office

EXPEDITED CONSIDERATION REQUESTED

BEFORE THE
SURFACE TRANSPORTATION BOARD



National Railroad Passenger
Corporation -- Petition for
Declaratory Order -- Weight
of Rail

STB Finance Docket No. 33697

ENTERED
Office of the Secretary

NATIONAL RAILROAD PASSENGER CORPORATION'S
MOTION FOR EXTENSION OF TIME

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Counsel for National Railroad
Passenger Corporation

June 13, 2002

BEFORE THE
SURFACE TRANSPORTATION BOARD

National Railroad Passenger	)	
Corporation -- Petition for	)	
Declaratory Order -- Weight	)	STB Finance Docket No.. 33697
of Rail	)	
	)	

**NATIONAL RAILROAD PASSENGER CORPORATION'S
MOTION FOR EXTENSION OF TIME**

The National Railroad Passenger Corporation ("Amtrak") hereby moves for a seven-day extension of time to file its rebuttal to Guilford's 1/ newly filed reply in this proceeding, which was served on Amtrak on June 11, 2002. Pursuant to this motion, Amtrak's rebuttal would be due on June 27, rather than on June 20 as provided under the Board's currently governing schedule. 2/

Amtrak's consultants advise that the requested extension is necessary in order to have time to analyze and develop a response to three expert studies included in the Guilford reply. In one, Phillip D. Brake, an Assistant Vice

1/ Springfield Terminal Railway Company, Boston and Maine Corporation, and Portland Terminal Company are referred to collectively as "Guilford."

2/ The Northern New England Passenger Rail Authority ("NNEPRA") seeks a comparable extension as to any rebuttal it may file.

President in Guilford's Engineering Department, engages in an extensive analysis of the Transportation Technology Center, Inc. ("TTCI") report submitted as part of Amtrak's opening case and in which TTCI explains the results of its track modulus testing of Guilford's Plaistow-Portland line; Mr. Brake's testimony includes detailed reliance on November 2001 dynamic deflection test data that was not used in the TTCI report and which has to date not been the focus of either Amtrak's or TTCI's analytical work (TTCI's report was based on September 2001 dynamic deflection test data). In the second, Guilford's consultant Allan Zarembski addresses certain technical issues related to TTCI's report. And in the third, Guilford's consultant Zeta-Tech Associates, Inc. reports on track modulus testing it performed at twelve locations during the period May 21-22, 2002, testing with which Amtrak has no previous familiarity and which raises a number of technical issues.

Guilford had an extended time to develop its reply to Amtrak's opening case. As explained in the verified statement of NNEPRA's Michael J. Murray (filed as part of that opening case), NNEPRA and Amtrak kept Guilford apprised of the progress of the track modulus testing being performed on Guilford's line last Fall, provided Guilford with a copy of the TTCI report on January 14, 2002 (almost five months before Guilford's reply was due in this proceeding), and gave Guilford the opportunity to discuss

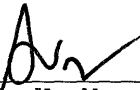
that report with TTCL, NNEPRA and Amtrak at a meeting held at Guilford's offices on March 7. Guilford had two months to review Amtrak's opening case (filed on April 12) before the due date of its reply.

Amtrak is requesting that the Board afford it fifteen days between the day it received Guilford's reply (on June 11) and the day its rebuttal would be due (on June 27). The seven-day extension being requested will give Amtrak the time needed to analyze the expert reports submitted by Guilford (and most importantly the technical data contained in those reports) and to develop an appropriate response.

CONCLUSION

For the reasons set forth above, Amtrak requests the Board to grant it (and NNEPRA) a seven-day extension to file its rebuttal to Guilford's reply submission.

Respectfully submitted,



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Counsel for National Railroad
Passenger Corporation

June 13, 2002

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of June, 2002, I caused to be served by the means indicated below a copy of the foregoing National Railroad Passenger Corporation's Motion for Extension of Time on the following:

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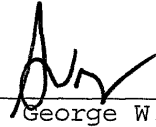
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