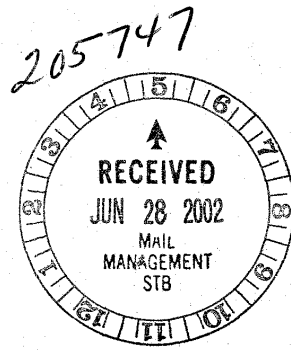


Before the
SURFACE TRANSPORTATION BOARD

Ex Parte No. 587
INFORMATION QUALITY GUIDELINES

SUPPLEMENTAL COMMENTS



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Attorney for John D. Fitzgerald

Dated: June 28, 2002

Before the
SURFACE TRANSPORTATION BOARD

Ex Parte No. 587
INFORMATION QUALITY GUIDELINES

SUPPLEMENTAL COMMENTS

John D. Fitzgerald,^{1/} for and on behalf of United Transportation Union-General Committee of Adjustment (UTU/GO-386), submits these supplemental comments, in response to Notice of Guidelines (NOG) issued April 1, 2002 (dated March 27), 67 FR 15450. (April 1, 2002).

UTU/GO-386 filed initial comments on May 1, 2002. These supplemental comments are submitted in light of developments which have transpired since May 1, 2002. Unlike other federal agencies, Surface Transportation Board (Board) did not advise the public that supplemental comments are invited.^{2/} Counsel for this commentator was advised May 9, 2002 by telephone that UTU/GO-386 could

^{1/} General Chairman for United Transportation Union on lines of The Burlington Northern and Santa Fe Railway Company, with offices at 400 E. Evergreen Boulevard, Vancouver, WA 98660.

^{2/} For example, Federal Maritime Commission, after advising that comments could be filed, 67 FR 37805 (May 30, 2002), thereafter extended the deadline to the entire public when Office of Management and Budget (OMB) notified all agencies that the time for agency draft final guidelines had been extended to August 1, 2002. 67 FR 41728 (June 19, 2002).

submit supplemental comments. Insofar as this commentor is aware, it is the only entity to have received notice.

1. The STB currently is delaying public release of filings submitted by parties by from one to two days more than the practice in effect prior to posting on the agency's website.

2. Current comment concerning the purpose of the quality guidelines may be found in O'Reilly, James T: OIRA'S Expanded Information Roles, 54 Admin. L. Rev. 835 (Spring 2002).

Respectfully submitted,


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June 28, 2002

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