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May 8, 2003



BY HAND DELIVERY

The Honorable Vernon Williams
Surface Transportation Board
1925 K Street NW
Suite 715
Washington, DC 20423-001

ENTERED
Office of Proceedings

MAY 8 2003

Part of
Public Record

Re: Docket No. AB-389 (Sub-No. 1X), Georgia Great Southern
Division, South Carolina Central Railroad Co., Inc. --
Abandonment and Discontinuance Exemption -- Between Albany
and Dawson, In Terrel, Lee And Dougherty Counties, GA
Petition To Vacate A Notice Of Interim Trail Use Or Abandonment
Pursuant To 49 C.F.R. 1152.29(c)(3)

Dear Secretary Williams:

Georgia Southwestern Railroad, Inc. ("GSRW") hereby responds to the Motion to Strike filed by South Georgia Rails to Trails ("SGRT") and Rails to Trails Conservancy ("RTC") on May 6, 2003.¹

On April 24, 2003, GSRW filed a reply to the Petition of the Association of American Railroads for Leave to Intervene and to File Comments ("Petition") and to the Motion for Leave to Intervene and Participate ("Pioneer Motion") filed by Pioneer Railcorp ("Pioneer"). On that same date, SGRT and RTC filed a reply to the Pioneer Motion. In their joint Motion to Strike, SGRT and RTC shamelessly argue that they are entitled to substantively respond to the Pioneer Motion but that GSRW does not enjoy that same right with respect to the AAR Petition. Moreover, the Motion to Strike is simply another attempt by counsel for SGRT inappropriately to interject substantive argument into the record in this proceeding.

The Motion to Strike seems to be premised on the faulty notion that a party can only respond to an intervener if the party opposes intervention. GSRW is

¹ GSRW has not yet been served with the Motion to Strike but became aware of the Motion this morning on the Board's website.

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unaware of any such Board prohibition and, consequently, requests that the Motion to strike be denied. To the extent that counsel for SGRT once again interjects in a procedural motion substantive argument that goes to the merits of the case, GSWR urges the Board to strike the Motion to Strike.

GSWR reserves the right to respond to the Joint Motion for Substitution in due course, particularly as to certain factual assertions which, most kindly, can be labeled as misleading.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karl Morell".

Karl Morell

cc: All parties of record.