

GREENVILLE CHARLESTON COLUMBIA FLORENCE

**Haynsworth
Sinkler Boyd, P.A.**

ATTORNEYS AND COUNSELORS AT LAW

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ANDREW J. WHITE, JR.
DIRECT DIAL NUMBER 864.240.3288
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August 15, 2003



Via: Federal Express

Mr. Vernon A. Williams
Surface Transportation Board
Office of the Secretary
1925 K. Street, NW
Washington, DC 20423

**ENTERED
Office of Proceedings**

AUG 18 2003

**Part of
Public Record**

Re: Verified Notice of Exemption Filed by
Greenville County Economic Development Corporation
Docket No.: AB-490X

Dear Mr. Williams:

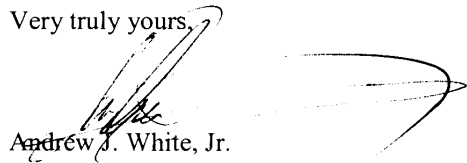
I am an attorney with Haynsworth Sinkler Boyd, P.A., attorneys for Greenville County Economic Development Corporation ("GCEDC") in the above referenced docket matter.

I have received a copy of a letter dated August 12, 2003, from John S. Simmons, Esq., regarding GCEDC's application before the Board and stating that his clients, Lee Groome and Groome Associates, Inc., have certain objections to GCEDC's application. The purpose of this letter is to address only one factual matter stated in Mr. Simmons' letter.

Mr. Simmons in the third paragraph of his letter states that his clients did not receive notice of the application. This is not correct. Enclosed is a copy of the letter I mailed to Mr. Simmons on May 13, 2003, advising him of the application and giving him a courtesy copy of the notification which GCEDC had sent to the various public agencies which by statute or regulation were entitled to notice. While we did not believe that such notice to Mr. Groome and his attorney was necessary under the statute or regulations, we nevertheless felt it was fair to give him such notice. Additionally, a public notice was printed in *The Greenville News* as shown by the documents previously filed in this matter.

Please inform me if you wish us to address the remainder of Mr. Simmons' letter in any formal reply. Needless to say, GCEDC strongly disagrees with the contentions and alleged "facts" raised by Mr. Simmons in his letter.

Very truly yours,



Andrew J. White, Jr.

AJWjr/evc

Enclosure

c: John S. Simmons

Virginia S. Lanford, Esq.

GREENVILLE

CHARLESTON

COLUMBIA

FLORENCE

Haynsworth
Sinkler Boyd, P.A.

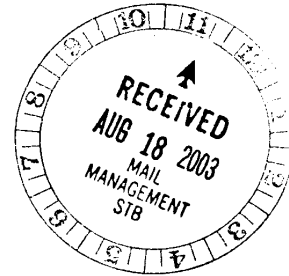
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ANDREW J. WHITE, JR.
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May 13, 2003

John S. Simmons, Esq.
Simmons Griffin & Lydon, LLP
P.O. Box 5
Columbia, SC 29202



Re: Greenville County Economic Development Corporation
HSB File No. 15159.0140

Dear Mr. Simmons:

Enclosed is a courtesy copy of the notification which Greenville County Economic Development Corporation has sent various public agencies in connection with its intention to seek authorization from the Service Transportation Board to discontinue service on the Greenville and Northern Railroad line (as more fully described in the attached documents).

Yours truly,

A handwritten signature in cursive script that reads "Andrew J. White, Jr." with a small flourish at the end.

Andrew J. White, Jr.

AJWjr/evc
Enclosure

GREENVILLE COUNTY ECONOMIC DEVELOPMENT CORPORATION

Mailing Address:

Patricia Haskell-Robinson, Secretary
c/o The Robinson Company of Greenville, Inc.
610 North Main Street
Greenville, South Carolina 29602
(864) 233-6277 Ext. 306

May 6, 2003

Board of Directors

Phyllis Henderson
Chairman & President

Patricia Haskell-Robinson
Secretary

Peter Strub
Treasurer

Joe Dill

Scott Case

South Carolina Public Service Commission
Attn: David Butler, General Counsel
101 Executive Center Drive
Columbia, SC 29210

Re: Greenville County Economic Development Corporation-Notice of Exemption

To Whom It May Concern:

This letter is to notify you that Greenville County Economic Development Corporation ("GCEDC") of Greenville, South Carolina, intends to file a verified notice of exemption under 49 CFR 1152.50 with the Surface Transportation Board for authorization to discontinue railroad service on its Greenville and Northern (G&N) Railroad Line, as described below. It is our understanding that no actual rail service has occurred on this line since 1993. GCEDC is seeking funds to repair the G&N Line, and if successful, GCEDC intends to make such repairs and to seek authorization from the Surface Transportation Board to renew rail service on the G&N Line.

GCEDC intends to discontinue service on the G&N rail line, which it purchased from Railtex of San Antonio, Texas, on May 28, 1999. The G&N Line, which was previously owned and operated by Railtex (now RailAmerica, Inc.), runs from the City of Greenville, South Carolina, at mile marker 0.0 to the northern limits of the City of Travelers Rest, South Carolina, at mile marker 11.8, for a distance of 11.8 miles.

The G&N Line runs through United States Postal Service ZIP Codes 29690, 29609, 29613, 29617, 29611, and 29601 in Greenville, South Carolina and 29690 in Travelers Rest, South Carolina.

GCEDC intends to file a verified notice of exemption with the Surface Transportation Board on or about May 20, 2003.

Based on information in our possession, the G&N line does not contain federally granted rights-of-way. Any documentation in the GCEDC's possession will be made available promptly to those requesting it.

Sincerely,



Phyllis Henderson
President, GCEDC

Cc: GCEDC Board of Directors
Andrew J. White, Haynsworth, Sinkler and Boyd, P.A.

South Carolina Public Service Commission
Attn: David Butler, General Counsel
101 Executive Center Drive
Columbia, SC 29210

The letter on the other side
was mailed to these agencies
on or about 5/7/03.

South Carolina Public Service Commission
Attn: Joseph Fianchino, Transportation Department
101 Executive Center Drive
Columbia, SC 29210

United States Department of Agriculture
Attn: Nancy S. Bryson, Esq., General Counsel
1400 Independence SW
Whitten Bldg. Rm. 107W
Washington, DC 20250-1400

United States Department of Agriculture
Chief of the Forest Service
Washington Office
201 14th & Independence, SW
P.O. Box 96090
Washington, DC 20090-6090

United States Department of Defense
Military Traffic Management Command
Attn: Robert Korpanty
MTMCTEA
720 Thimble Shoals Blvd, Suite 130
Newport News, VA 23606

United States Department of Interior
The National Park Service
Attn: Horace Clark, Esq.
Office of the Solicitor
75 Spring St. SW
Richard Russell Federal Bldg.
Atlanta, GA 30303

United States Department of Interior
Recreation Resources Assistance Division
Attn: Horace Clark, Esq.
Office of the Solicitor
75 Spring St. SW
Richard Russell Federal Bldg.
Atlanta, GA 30303

United States Department of Interior
The National Park Service
Southeast Region
Atlanta Federal Center
100 Alabama St. SW
Atlanta, GA 30303

Ms. Barbara Hines
Land Section
U.S. National Forest Service
4931 Broad River Road
Columbia, SC 29212

MILE POST 11.8
(APPROXIMATE)

TRAVELERS REST
CITY LIMITS

GCEDC RAILROAD

GREENVILLE
CITY LIMITS

MILE POST 0.0

0 3000' 6000' 9000'



GREENVILLE COUNTY ECONOMIC DEVELOPMENT CORPORATION

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