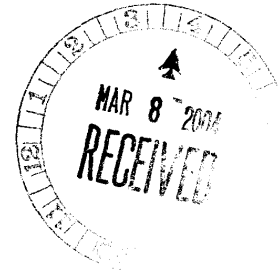


March 8, 2004

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Via Messenger

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

RE: STB Finance Docket No. 27590 (Sub-No. 3), *TTX Company, et al.—Application for Approval of Pooling of Car Service with Respect to Flatcars*

Dear Secretary Williams:

Enclosed please find the original and ten (10) copies of the National Industrial Transportation League's Petition for Extension of Time to File Comments, submitted in the above-referenced docket.

Also, enclosed is one additional copy of this Petition for stamp and return. Kindly date-stamp the additional copy for return to this office by messenger.

If you have any questions, please do not hesitate to contact me. My office telephone number is (202) 331-8800.

Sincerely,

Michael H. Higgins

Nicholas J. DiMichael
Michael H. Higgins

Attorneys for:

The National Industrial Transportation League

BEFORE THE
SURFACE TRANSPORTATION BOARD

STB FINANCE DOCKET NO. 27590 (Sub-No. 3)

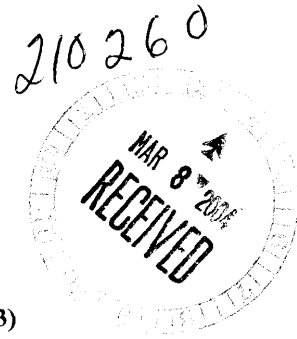
TTX COMPANY, ET AL.—APPLICATION FOR APPROVAL OF POOLING OF CAR SERVICE WITH RESPECT TO FLATCARS

PETITION FOR EXTENSION OF TIME TO FILE COMMENTS OF
THE NATIONAL INDUSTRIAL TRANSPORTATION LEAGUE

Comes now the National Industrial Transportation League ("NITL" or "the League"), by and through its attorneys, and submits this Petition for Extension of Time to File Comments in STB Finance Docket No. 27590 (Sub-No. 3), *TTX Company, et al.—Application for Approval of Pooling of Car Service with Respect to Flatcars* ("the proceeding"). For the reasons stated herein, which constitute good cause, NITL respectfully requests that the Board grant it an extension to file comments in this proceeding by April 12, 2004.

I. IDENTITY AND INTEREST OF THE LEAGUE.

The League is the oldest and largest nationwide organization representing parties concerned with the transportation of goods. NITL has over 600 separate company members who conduct industrial and/or commercial enterprises throughout the United States and internationally and use all modes of transportation to move commodities in interstate, intrastate, and international commerce. NITL members ship substantial volumes of commodities by



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railroad that travel aboard railcars. Accordingly, NITL has a substantial interest in the Board's resolution of the issues raised in this proceeding, which implicate both integrated operation of the nation's railroad system and competition within the rail industry and the transportation industry, as a whole.

II. NITL'S REASONS FOR REQUESTING AN EXTENSION CONSTITUTE GOOD CAUSE.

NITL offers three reasons in support of this Petition for Extension, which constitute good cause for the Board to grant NITL's request. First, NITL submits that it will hold its Rail Transportation Committee and Board meetings during March 22-24, 2004. At these meetings, NITL plans to review information received from its members and to develop its position on the various issues raised in this proceeding. The Board's existing procedural schedule, which requires comments by March 22, will not allow these important meetings to take place before comments are due.

Second, even after these meetings take place, the League will require time to draft a position. NITL must review its members' feedback, synthesize the information, and develop a consensus on the issues that will be reflected in its comments. This is by no means a simple undertaking, and NITL requires sufficient time to complete this process.

Third, NITL submits that its counsel has conferred with counsel for TTX and that TTX does not object to NITL's request for extension until April 12, 2004, as long as TTX is allowed 30 days from that date to submit its rebuttal. NITL notes that counsel for TTX was similarly receptive to a request submitted by the Department of Defense, which has also requested an extension from the Board until April 12, 2004.

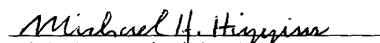
III. CONCLUSION

NITL respectfully submits that the reasons offered above constitute good cause for the Board to grant the extension sought by NITL. Accordingly, NITL requests that the Board issue an order permitting it to file comments by April 12, 2004.

Respectfully submitted,

The National Industrial Transportation League

By its attorneys,



Nicholas J. DiMichael

Michael H. Higgins

THOMPSON HINE LLP

1920 N Street, N.W.

Suite 800

Washington, D.C. 20036

(202) 331-8800

March 8, 2004

CERTIFICATE OF SERVICE

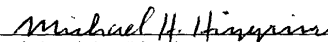
I hereby certify that on this day, March 8, 2004, I have served copies of the foregoing
Petition for Extension of Time to File Comments of the National Industrial Transportation
League by the means indicated on the parties listed below:

By hand delivery

David L. Meyer
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

By overnight mail

Patrick B. Loftus
TTX Company
101 North Wacker Drive
Chicago, IL 60606


Michael H. Higgins