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July 30, 2004

Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Suite 700
Washington, DC 20423

ENTERED
Office of Proceedings

JUL 30 2004

Part of
Public Record

RE: Ex Parte No. 647, *Class Exemption for Expedited Abandonment Procedure for Class II and Class III Railroads*

Dear Secretary Williams:

RailAmerica, Inc. ("RailAmerica") commends the Surface Transportation Board (the "Board") for beginning the process to attempt to simplify the abandonment process for Class II and Class III railroads. RailAmerica is the holding company for 33 short line railroads operating in the United States. RailAmerica is not participating in the hearing that the Board will hold on August 11, 2004, but intends to participate in any proposal that emanates from the hearings and the Board's own analysis of the abandonment process.

RailAmerica recognizes that the Board knows that many short line railroads are the last attempt to reinvigorate and preserve service on a rail line that has proven to be marginal or uneconomical for another railroad to operate. However, there are times, after a reasonable effort has been made, when a short line is unsuccessful in reinvigorating and preserving service on a rail line. RailAmerica is hopeful that as a result of this proceeding, the Board will take steps to reduce the burden and delay on short line railroads that have emerged under the existing abandonment process.

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Page 2

Enclosed for filing are the original and ten copies of this letter and three diskettes with this letter. Please time and date stamp the extra copy of this letter and return it with our messenger. If you have any questions, please contact me.

Sincerely yours,

A handwritten signature in black ink, appearing to read "L. Gitomer", written over the typed name.

Louis E. Gitomer
Attorney for RailAmerica, Inc.

cc: Parties of Record