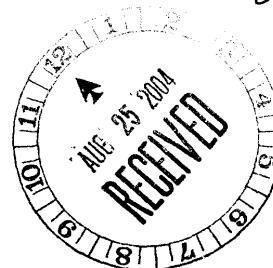


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August 25, 2004

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423

ENTERED
Office of Proceedings

AUG 25 2004

Part of
Public Record

Re: STB Ex Parte No. 646 – Rail Rate Challenges In Small Cases – Notice Of Intent To Participate

Dear Secretary Williams:

On April 22, 2004, the Surface Transportation Board ("Board") held a public hearing on the above referenced matter for the purpose of providing a forum for the expression of views and proposals by rail shippers, railroads, and other interested persons regarding rail rate challenges in small rate complaint cases to be considered by the Board. The Paducah & Louisville Railway, Inc. ("P&L") did not participate in that hearing but supported the comments and testimony of the American Short Line and Regional Railroad Association and of Mr. Larry Parsons, Chairman and CEO of the Wheeling and Lake Erie Railway Company.

After reviewing the record in this proceeding, P&L has become increasingly concerned that the various proposals and ideas that have been put forth so far in this proceeding would, if adopted, have serious adverse consequences to small and regional railroads, such as P&L. Accordingly, P&L intends to participate in all future hearings and/or rulemakings in this docket and desires to become an active party of record. Accordingly, please add the following representative as a party of record in this proceeding for the Paducah and Louisville Railway Company:

William A. Mullins
Baker and Miller PLLC
2401 Pennsylvania Ave, N.W.
Suite 300
Washington, D.C. 20037

A copy of this letter has been sent to all known parties of record. P&L respectfully requests that its representative be provided with a copy of any future filings or correspondence in this

BAKER & MILLER PLLC

Honorable Vernon A. Williams

August 25, 2004

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proceeding and in accordance with the requirements of 49 C.F.R. § 1104.12. An original and ten copies of this request to be made a party of record are also being provided to the Board for its records and in accordance with 49 C.F.R. § 1104.3.

Sincerely,

A handwritten signature in cursive script, appearing to read "William A. Mullins", is written over the printed name.

William A. Mullins

cc: J. Thomas Garrett
Parties of Record