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March 12, 2005

VIA FEDEX

Honorable Vernon A. Williams
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423-0001



Re: STB Ex Parte No. 657

Dear Secretary Williams,

Pursuant to the Board's Notice dated February 16, 2005 in Ex Parte No. 657, Rail Rate Challenges Under the Stand-Alone Cost Methodology, this letter constitutes my notice of intent to participate in the hearing scheduled for March 24, 2005.

I am an independent transportation consultant, and over the past 20 years have provided testimony before this Board and its predecessor on numerous railroad matters. In my practice, I have developed and/or evaluated several plans for the construction of new rail facilities that are in many ways analogous to the stand-alone railroads currently at issue. I have also performed extensive analyses related to railroad productivity issues. I believe this experience provides a basis from which I can make suggestions and proposals of the type sought by the Board in its Notice.

I currently expect to make as many as 6 to 8 such suggestions and proposals, which will be submitted in written testimony according to the schedule established by the Board. I request a time allotment of 15 minutes at the hearing, but would be amenable to any enlargement of that time that the Board may deem appropriate to discuss specific issues.

I take no position with respect to the shippers' request dated February 28, 2005 to modify the schedule of this proceeding. I am able to participate on the original schedule or on any modification thereof that the Board may order.

Sincerely,

Michael A. Nelson

Enclosures: 10 copies.