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CUT

BY FAX TO 565-9011

December 20, 2005



Hon. Vernon A. Williams, Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001
Attn: Mr. Melvin Clemens

RE: STB Finance Docket No. 34802, Petition of Pyco Industries, Inc., for Alternative Rail Service over the tracks and facilities of South Plains Switching Ltd.

Dear Mr. Clemens:

I am writing on behalf of my client, West Texas & Lubbock Railway Co., Inc. ("WTL") to correct an inadvertent mistake in its letter of support dated December 19, 2005, for the Pyco Industries, Inc., Petition for Alternative Rail Service faxed to you yesterday. The paragraph at the top of the letter referencing the proceeding characterized this matter as one for an emergency rail service order. That characterization is incorrect. It should have described the matter as one for Alternative Rail Service.

WTL's December 19 letter of support is included in a package that Pyco is submitting to the Board today by overnight mail. I am furnishing a corrected copy of this letter by fax along with copies to Vernon Williams by mail.

Sincerely yours,

John D. Heffner

Cc: Charles Montagne, Esq. (by fax)

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CORRECTED VERSION

December 19, 2005

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

RE: STB Finance Docket No. 34802, Petition of Pyco Industries, Inc., for Alternative Rail Service over the tracks and facilities of South Plains Switching Ltd.

Dear Mr. Williams:

I am writing on behalf of my client, West Texas & Lubbock Railway Co., Inc. ("WTL") in connection with the above-captioned proceeding. Subject to the caveats and conditions identified below and pursuant to the Board's regulations at 49 CFR 1146 (Expedited Relief for Service Emergencies), WTL is willing to provide alternative rail service for Pyco Industries, Inc. (Pyco) and other customers currently served by the South Plains Switching Ltd. (SAW) at Lubbock, TX.

WTL is a class III short line railroad owned by Permian Basin Railways, Inc. (Permian), a short line railroad holding company headquartered in Chicago, IL. WTL currently owns and operates over 100 miles of track in and around Lubbock, TX, and contiguous areas. WTL currently handles approximately 4000 carloads of traffic annually utilizing 3 engines and 10 employees. WTL connects with the Burlington Northern Santa Fe Railway (BNSF) at Lubbock. WTL's owner, Permian Basin, currently owns two other short lines in the southwestern part of the country and will be acquiring a third property on December 22, 2005. Its senior management collectively has over 125 years of experience in providing railroad service, much of it obtained through employment with either class I carriers

or other regional or short line railroads before starting Permian Basin in 2002.

Pyco seeks alternative service from WTL because its current carrier (SAW) is either unwilling and/or unable to provide service. Barring relief from the Board, Pyco and SAW's other Lubbock area customers will either be forced to turn to truck service permanently or even shut down operations. WTL has reviewed the Board's alternative service regulations and believes that Pyco and SAW's other Lubbock area customers are entitled to relief.

Briefly, the Board's regulations require that the alternative rail service provider -- WTL here -- 1) commit to providing service, 2) be able to provide service safely without degrading service to its existing customers, and 3) be able to provide service without unreasonably interfering with the incumbent carrier's ability to service the needs of its own customers.

In response, WTL states:

1. Subject to its making appropriate arrangements with BNSF for interchange of Pyco's traffic and the traffic of SAW's other Lubbock area customers and commercial arrangements with BNSF for transfer of freight and further subject to WTL's determining that it can safely operate over the subject track, WTL will commit to providing service to Pyco and other customers on the subject line of SAW. The fact that WTL has a longstanding, good relationship with BNSF generally and its people in Lubbock specifically should help to insure a smooth takeover of operations.
2. WTL represents that it can undertake to provide the requested service without jeopardizing service to its current customers. WTL has sufficient locomotives, crews, equipment, and experience that it can provide service over SAW without affecting service over its own railroad. In that regard, WTL will assign one of its own engines to serve customers on the affected trackage and is making arrangements to bring in additional power from another subsidiary. Furthermore, because WTL's railroad is physically

separate from SAW's Lubbock trackage, there should be no operating conflicts or other operational problems.

3. Because Pyco seeks alternative rail service authority covering all of SAW's trackage and operations in the Lubbock area, WTL's service would replace that of SAW entirely. Accordingly, WTL's operations should not adversely affect those of the incumbent carrier [SAW].

Please contact me if you have any questions

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. D. Heffner", with a long horizontal line extending to the right.

John D. Heffner
Counsel for West Texas
& Lubbock Railway Co., Inc.

cc: Mr. Melvin Clemens (by fax)
Charles Montagne, Esq.