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THOMAS F. McFARLAND

May 19, 2006

By e-mail

Vernon A. Williams, Secretary
Surface Transportation Board
Case Control Unit, Suite 713
1925 K Street, N.W.
Washington, DC 20423-0001

Attn: Mr. Melvin Clemens

Re: STB Finance Docket No. 34802, *PYCO Industries, Inc. -- Alternative Rail Service*
-- South Plains Switching, Ltd. Co.

Dear Mr. Williams:

This is the reply of SOUTH PLAINS SWITCHING, LTD. CO. (SAW) to a letter to you dated May 17, 2006 from West Texas & Lubbock Railway (WTLC).

SAW's response to the three issues raised by WTLC is as follows:

1. The issue raised in WTLC's Point No. 1 has been fully argued. PYCO Industries, Inc. (PYCO) requested that the Board modify the operating protocol to require SAW to move railcars that are in revenue storage off a SAW "Y" track. That request was made in PYCO's Opposition to SAW's Petition to Terminate Alternative Rail Service, filed April 6, 2006. SAW replied in opposition to that request on April 13, 2006. On May 17, 2006, PYCO reiterated that request in a Petition for Immediate Injunctive Relief. SAW intends to reply in opposition to that Petition in the near future. WTLC's May 17 filing does not contain any evidence or argument of substance that bears on the appropriate resolution of that issue.
2. SAW vehemently denies that its operations in the yard are creating a safety hazard. SAW and WTLC have joint use of the main track. SAW uses Track Nos. 2, 3, 6 and a short portion of the main track at its east end. That does not constitute a safety hazard, nor does it interfere with WTLC's service to PYCO, which is performed entirely in the west end of the yard. SAW has never blocked the main track nor caused delays for WTLC during WTLC's hours of operation.

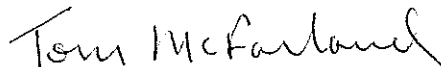
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WTLC does the very thing about which it complains. WTLC continuously uses all of the west end of the yard, including Track Nos. 2 and 3 when needed, and blocks the west end of the main track when WTLC ties up. That prevents SAW from providing service to Brite Trucking Company. That appears to be retaliatory action by WTLC and PYCO inasmuch as Brite Trucking wrote letters of support for SAW in the proceeding on alternative rail service. WTLC also continuously leaves switches misaligned and derails off.

3. Contrary to WTLC's allegation, SAW has performed inspections and maintenance of trackage used by SAW and WTLC as required. WTLC complains that SAW doesn't do enough track repair and then complains when SAW takes track out of service for repair.

Very truly yours,



Thomas F. McFarland
*Attorney for South Plains
Switching, Ltd. Co.*

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