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July 13, 2006

VIA E-FILING

Mr. Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W., Room 700
Washington, DC 20423-0001

Re: **Ex Parte No. 575**
Review of Rail Access and Competition Issues—Renewed
Petition of the Western Coal Traffic League

Dear Secretary Williams:

Enclosed for filing in the above-captioned proceeding is the Summary of Presentation of Larry R. Parsons on behalf of Wheeling & Lake Erie Railway Company. If the Board places speakers on panels, we request that Mr. Parsons appear on the same panel as the speakers from the Association of American Railroads and the American Short Line and Regional Railroad Association.

Please contact me if you have any questions.

Very truly yours,


William C. Sippel
Attorney for Wheeling & Lake Erie
Railway Company

WCS: arw

Enclosure.

BEFORE THE
SURFACE TRANSPORTATION BOARD

EX PARTE NO. 575

REVIEW OF RAIL ACCESS AND COMPETITION ISSUES--
RENEWED PETITION OF THE WESTERN COAL TRAFFIC LEAGUE

SUMMARY OF PRESENTATION OF LARRY R. PARSONS

In his presentation before the Board scheduled for July 27, 2006 in the above-captioned proceeding, Mr. Parsons will make the following points:

1. Paper barriers have allowed line sale and lease transactions to occur which otherwise could not have been accomplished. This has benefited both railroads and shippers.
2. Paper barriers in previous transactions were the subject of arms length negotiations between the railroad parties and reflected consideration being given and received on both sides.
3. Paper barriers have been instrumental in the growth of the short line and regional railroad network.
4. Regulatory interference with the opportunity for the parties to privately negotiate transactions with paper barriers would discourage further line sale and lease transactions to the detriment of short lines and regional railroads and their potential customers.
5. There is no basis for the Board to take broad action in a rulemaking proceeding that would adversely affect the current or potential use of paper barriers in line sale and lease transactions.