

LAWRENCE W. BIERLEIN
DOUGLAS M. CANTER
PHILIP L. CHABOT, JR.
JOHN M. CUTLER, JR.
ANDREW P. GOLDSTEIN
STEVEN J. KALISH
RICHARD D. LIEBERMAN
CHANNING D. STROTHER, Jr.

LAW OFFICES
McCARTHY, SWEENEY & HARKAWAY, P.C.
SUITE 600
2175 K STREET, N.W.
WASHINGTON, D.C. 20037
(202) 775-5560

217 450

FACSIMILE
(202) 775-5574

E-MAIL
MSH@MSHPC.COM

WEBSITE
HTTP://WWW.MSHPC.COM

NICOLE S. ALLEN, ASSOCIATE*
WARREN S. FELDMAN, STAFF ATTORNEY

*ADMITTED IN NY

September 1, 2006

Vernon A. Williams, Esq.
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423

Re: Ex Parte No. 646 (Sub-No. 1)
Simplified Standards for Rail Rate Cases

Dear Secretary Williams:

American Soybean Association hereby notifies the Board of its intent to participate in the above-referenced proceeding, through the following:

Mark Palmer
American Soybean Association
600 Pennsylvania Avenue, SE
Suite 320
Washington, DC 20003

Sincerely,

Andrew P. Goldstein

cc: Known Parties of Record