

SK Snavely King Majoros O'Connor & Lee, Inc.

Economic and Management Consultants

217593



September 21, 2006

By Hand Delivery

Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street NW
Room 700
Washington DC 20423

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

Dear Secretary Williams,

Snavely King Majoros O'Connor & Lee, Inc ("SK") submits this letter in regard to the request for workpapers underlying the Board's July 28, 2006 decision in this proceeding filed by Nicholas DiMichael, counsel for The National Industrial Transportation League ("NITL").

SK understands that some of requested information may be subject to protective orders adopted by the Board. In the event that some of workpapers are subject to a protective order, SK would agree to comply with a protective order issued by the Board. To the extent that the Board makes workpapers available to Mr. DiMichael and NITL, SK requests that the same information be made available to SK.

Respectfully submitted,

Kim Hillenbrand

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CC: All Parties of Record