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September 28, 2006

VIA E-FILING

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

Re: STB Finance Docket No. 34922
*Keokuk Junction Railway Co. – Feeder Line Application – South
Plains Switching, Ltd. Co.*

Dear Secretary Williams:

On September 26, 2006, PYCO Industries (“PYCO”) filed with the Board an unsigned “Request for Issuance of Sub Poena/Motion to Compel Against Pioneer Railcorp and its Subsidiary, KJRY” (“Motion”). Despite the applicable discovery provisions at 49 CFR 1114.31 providing an orderly process for resolving discovery disputes, PYCO wants the Board to ignore the rules and has requested Board action on the motion by the close of business on September 29, 2006. Keokuk Junction Railway Co (“KJRY”) and Pioneer Railcorp (“Pioneer”), a nonparty, request the Board to reject this request.

A reply to PYCO’s motion to compel is governed by 49 CFR 1114.31(a)(1) and 49 CFR 1104.13. Under those rules, KJRY and Pioneer have twenty (20) days, or until October 16, 2006, to file a reply to the Motion. As such, the Board should not issue a ruling until KJRY and Pioneer have had a chance to reply. Nonetheless, in light of the procedural posture of this case and in the interest of a prompt resolution of this dispute, KJRY and Pioneer will respond to PYCO’s Motion in half that time, on October 6, 2006.

Pioneer has, of course, objected to discovery against it, and PYCO has never formally tendered discovery to KJRY. Nevertheless, KJRY will deem all discovery served upon and directed to Pioneer as served upon KJRY effective September 20, 2006, the date that PYCO’s counsel instructed KJRY in writing that it should do so. Accordingly, pursuant to 49 CFR

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1114.26(a), KJRY will respond to PYCO's discovery requests by no later than October 5, 2006, subject to the standard objections if appropriate.

If there are any questions about this matter, please contact me directly, either by telephone: (202) 663-7823 or by e-mail: wmullins@bakerandmiller.com.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'William A. Mullins', with a long horizontal flourish extending to the right.

William A. Mullins
Attorney for Keokuk Junction Railway Co.

cc: All Parties of Record