



September 25, 2006

Surface Transportation Board
1925 K Street NW
Washington, DC 20423-0001

Via E-Filing

Ref: Ex Parte No. 661

To whom it may concern:

The proposed rules in Ex Parte No. 661 include a requirement that rail fuel surcharges be calculated based on mileage or preferably weight and mileage. In case the question arises as to the feasibility, cost, or speed to implement fuel surcharges based on mileage, ALK offers this comment.

ALK Technologies, Inc. has developed and markets an easy to use and affordable rail mileage calculation program, PC*MILER|Rail, which is widely used in the railroad industry by both carriers and shippers to calculate point-to-point rail mileage. The database that underlies that program is maintained by ALK and has been used by ALK to calculate the mileage on the STB Waybill Sample for over 25 years. PC*MILER|Rail-Connect is a companion program that allows rail mileage calculation to be easily and directly integrated into corporate information technology systems.

Additional information may be found at <http://www.alk.com/pcmiller/rail.asp>.

Sincerely,

Mark A. Hornung
Sr VP - Operations

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