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October 4, 2006

VIA ELECTRONIC FILING

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

RE: STB Finance Docket Nos. 34890 and 34922
*PYCO Industries, Inc. — Feeder Line Application — Lines Of South Plains
Switching, Ltd. Co.; Keokuk Junction Railway Co. — Feeder Line Application —
Lines of South Plains Switching, Ltd. Co.*

Dear Secretary Williams:

On behalf of Keokuk Junction Railway Co. ("KJRY"), I am writing to clarify a matter relating to discovery in the above-docketed proceedings. During the course of preparing responses to the discovery requests of Pyco Industries, Inc. ("PYCO"), KJRY has noted that PYCO's "Requests for Production of Documents and Interrogatories" ("First Requests") has an incorrect service date of "24 July 2006." See Exhibit B to PYCO's Motion to Compel filed on September 26, 2006 ("Motion"). That certificate should not have read "24 July 2006." Upon investigation, counsel for KJRY and Pioneer Railcorp ("Pioneer") first received the First Requests by facsimile on August 24, 2006 or August 25 (PYCO's Counsel's facsimile time and date stamp is unreadable). KJRY believes that the incorrect service month was probably an unintentional scrivener's error by PYCO's counsel and that PYCO's Counsel was not attempting to deliberately mislead the Board or KJRY.

Nevertheless, in its Motion, PYCO repeats the error, stating on page 1 that it is requesting, among other things, that the Board compel responses to discovery "served on 24 July 2006." Later statements in PYCO's Motion, however, confirm that the First Requests were not served until at least August 24. See Motion at 6 ("Pioneer/KJRY have been on notice of PYCO's discovery since ... August 25 for [the First Requests]") and 7 ("As to interrogatory answers, Pioneer and KJRY have been on notice since August 25 and August 30").

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KJRY brings this matter to the Board's attention merely as a matter of clarification and to ensure that the Board does not rely on the purported (and incorrect) First Requests service date of "24 July 2006" to the extent that any further Board action is deemed necessary in connection with discovery in these proceedings.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William A. Mullins", written in a cursive style.

William A. Mullins

Attorney for Keokuk Junction Railway Co.

cc: All Parties of Record