

2 18100

CHARLES H. MONTANGE
ATTORNEY AT LAW
426 NW 162ND STREET
SEATTLE, WASHINGTON 98177
(206) 546-1936
FAX: (206) 546-3739



15 November 2006

Hon. Vernon Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings
NOV 17 2006
Part of
Public Record

Re: Dr. Daniel Fiehrer -- Feeder Line Application --
BNSF's Helena to Great Falls line, F.D. 34947

Dear Mr. Williams:

This letter is submitted as a comment on behalf of Recreation Trails, Inc., Eric Grove, and Doug Monger¹ ("Commenters") in support of the position of BNSF Railway that the above-referenced feeder line application should not be accepted for filing.

49 U.S.C. § 10907 was intended to apply to "feeder lines" -- lines on which shippers received or originated shipments-- and not to trunk lines carrying overhead traffic. This is

¹ Recreational Trails, Inc., P.O. Box 553, Great Falls, MT 59401, is a non-profit trail advocacy organization which for the past 15 years has actively sponsored the Rivers Edge Trail and other trails in the Great Falls area. Mr. Grove (529 3rd St., Helena, MT 59601) is the owner of Great Divide Cyclery in Helena, which sponsors bicycle events, team members, and the creation of bicycle routes. Mr. Monger (1111 Leslie Ave., Helena, MT 59601) is the former Administrator of Montana State Parks and has long been an advocate for parks and trails in Montana. Mr. Monger and Mr. Grove while acting as individuals for purposes of this comment in order to provide it promptly to the Board, are themselves members of the Corridor of Discovery Action Committee in Helena. This Committee among other things supports creation of a rail trail along Little Prickly Pear Creek and the Missouri River should BNSF seek abandonment authority for its Helena to Great Falls railroad right-of-way located there. That line should be preserved for rail and, if not needed for rail, trail purposes in the public interest.

apparent from the legislative history,² the title to the implementing regulations in Part 1151 ("Feeder Railroad Development Program"), and the structure of the statute (to be applicable, railroad must refuse "to make necessary efforts to provide adequate rail service to shippers who transport traffic over such line," 49 U.S.C. § 10907(c)(1)(A)).

There are no shippers who transport traffic over the Helena to Great Falls line; moreover, Dr. Fiehrer presents no evidence that any potential customer even has sought to receive or to dispatch a car over that line. Dr. Fiehrer's FLA and the exhibits attached show no support from any actual or potential customer on the line for the FLA, let alone any shipper claim that existing service is inadequate, or that BNSF has failed to make necessary efforts. Indeed, despite many pages of speculation, in the end Dr. Fiehrer's FLA and exhibits do not even demonstrate the existence of a shipper for the line.³

Since there is nothing to be fed on the line, it is not a plausible candidate for a "feeder line application." Indeed, the Fiehrer FLA admits as much: the operational plan (and economics) which Dr. Fiehrer presents are inherently based on serving through (overhead) traffic that might traverse the line, but not load or unload on it. To this end, Dr. Fiehrer projects possible speculated growth in traffic from central Canada to central Mexico, which would move over the line. He also indicates that he would seek to divert overhead traffic from BNSF's current through routes to instead travel over the

² Congressman Madigan, the proponent of the feeder line program, very clearly indicated that he intended to reach branch lines, not overhead lines:

"a railroad providing inadequate service to a shipper on a branch line can lose his operating rights in that territory through a Commission proceeding. Whenever a shipper, a group of shippers, or a governmental entity finds that service is inadequate on a branch line, they may decide to take over the operation of the line themselves."

124 Cong. Rec. 24840-41 (Sept. 9, 1980).

³ The only letter by a "shipper" which Dr. Fiehrer presents is from Gwynn Lumber and Reload (Fiehrer FLA, page 116 of 125 on the STB website), but Gwynn is located in Eureka, on a shortline in the extreme northwestern corner of Montana, hundreds of miles from the Great Falls to Helena line at issue. Dr. Fiehrer also presents a letter from Excel (Fiehrer FLA, p. 107 of 125 on the STB website), but this on its face states that it does not declare company policy, and in any event, Excel is not on the line either. Commenters have examined the line for potential trail purposes; there does not appear to be a single potential shipper actually located on the line at this time.

line. Finally, he argues that BNSF has a near monopoly on Montana traffic, implying that he would break the monopoly by unlocking a new corridor from central Montana to the Union Pacific lines in Idaho.

Even if feeder line applications could be used to acquire lines without any customers, Dr. Fiehrer's proposal is speculative at best. Thus although some trend (perhaps global warming?) may stimulate enough growth in central Canada over time to necessitate a major new rail route down the east side of the Rockies to Mexico, the identity of the trend is not disclosed, let alone its scope. If one wants to keep the line available to await the effects of global warming or other trends, it makes far more sense to allow well-off BNSF to carry the burden (BNSF after all represents that after due deliberation it wishes to do so) rather than to transfer ownership to Dr. Fiehrer who, even if he were well-meaning, has less than \$ 5 million to devote to the effort (assuming arguendo he devotes his entire net worth to subsidizing the acquisition). In other words, if holding the line together for the future is the issue, Dr. Fiehrer does not show how he improves service over (i.e., is more reliable and adequate than) the holding service provided by BNSF.

Whether any Montana overhead will divert to the line depends on costs; it is not established that the line when costed out can be operated more cheaply than those BNSF currently uses. Indeed, as Dr. Fiehrer's consultant (Mr. Lande in Fiehrer FLA at page 113 of 125 of website) seems to recognize, overhead travels on existing BNSF tracks more cheaply than it would over Helena-Great Falls. Montana Rail Link basically gave Mr. Fiehrer a letter expressing no interest even in operating the line due to "little if any customer base" to support costs of operation, let alone costs both to acquire and to operate. Fiehrer FLA at p 118 of 125 at STB website.

As to link-ups with UP to break alleged BNSF monopolies, according to the BNSF system diagram map, Dr. Fiehrer's acquisition of this line would not result in a new link from Montana to Union Pacific (any more than it would create any new route from Mexico to Canada). The path from central Montana to UP is broken up with multiple ownership and control regardless of the ownership of the Helena to Great Falls line. Dr. Fiehrer has not shown how his ownership would help any off-line shipper reach UP. He would add to the segmentation of the connections needed to reach UP, not reduce the segmentation.

In short, Dr. Fiehrer's case for the line as an overhead trunk line is based on speculation, or on conditions which are not met by the facts on the ground. In any event, the Fiehrer FLA does not establish any reason to expect he would or could improve conditions from what they are. To the contrary, Montana

Rail Link stated (at FLA p. 118 of 125 of STB website) that it believed there was insufficient traffic base to break even to begin to defray operating expenses. Dr. Fiehrer's case for application of section 10907 amounts to a hypothetical at all levels, and a hypothesis demonstrates an entitlement at law no more than it establishes a theory in science. One must offer some credible evidence to support ones hypothesis in order to prove a case and not simply utter the hypothesis.

Absent a showing that some public end can reasonably be expected to result from the FLA, Dr. Fiehrer's effort seems little more than an effort to take a property for private rather than public purposes. But that is unconstitutional whether or not "just compensation" is paid.

BNSF suggests that the Fiehrer FLA is a ruse, that Dr. Fiehrer owns property adjacent to the line, that he opposes trails, and that his filing is prompted by a desire to ensure that there is never a trail on the premises. Commenters concur that Dr. Fiehrer apparently owns adjoining property and is a well-known trail opponent. Commenters can make sense of the FLA only if tendered as part of an effort to ensure that no trail can ever be located on the Helena to Great Falls line.

BNSF, however, is not seeking to turn the corridor into a trail. Instead, BNSF states that it is keeping the rail line intact for possible future rail use. Dr. Fiehrer responds in essence that it is unreasonable for BNSF to keep its assets tied up in this inactive line pending possible future reactivation for rail purposes. If by this Dr. Fiehrer means that BNSF has an alternative which accomplishes its stated end at lower cost, Commenters agree: BNSF can accomplish all its ends with less burden through application of 16 U.S.C. § 1247(d).⁴ It is Dr. Fiehrer's fear that BNSF eventually may so view the matter that motivates his FLA, not inadequate service to shippers or rail economics.

Wholly apart from the problem that Dr. Fiehrer's FLA is not for a feeder line, his FLA has a number of glaring deficiencies. It is supposed to contain estimates (and the basis of the estimates) of "net liquidation value" (NLV) and "going concern value" (GCV). 49 C.F.R. § 1151.3(a)(4). This information is necessary in part to determine financial responsibility and in part as a prima facie case for purposes of valuation of the asset for forced sale purposes. The FLA

⁴ This would preserve the line for the future and free up all BNSF assets in the interim, a good deal for BNSF and shippers (who will not be cross-subsidizing the expenses of holding an inactive line), and the public (which gets a preserved rail corridor and a trail).

ignores GCV on the ground that there is no traffic.⁵ As to NLV, the FLA argues that the line is worthless (zero or less) on the meager premise that BNSF would otherwise have sold it coupled with speculation that perhaps the costs of removal of rail, or perhaps of clean up of environmental contamination, are very high. By suggesting a zero or negative NLV, the FLA amounts to a request for a donation.

Rather than assume BNSF's failure to sell the line shows it is worthless, one could just as easily take BNSF at its word that it is holding onto the line as a future rail investment. Alternatively, one could as easily hypothesize that BNSF is delaying sale because it wishes to profit from rising values of steel and land. In other words, Dr. Fiehrer's "evidence" so far is just as consistent with BNSF perceiving the asset to be a safe and reasonable investment. The "evidence" is simply speculation that proves nothing. More specifically, Dr. Fiehrer offers no evidence for an NLV of zero. The closest the FLA comes to a number appears to be at p. 41 where the author of the FLA calculates the "scrap" value of the track and ties.⁶ The FLA seems to indorse a value of \$3,375,520 for these fixtures, but then offers no number at all for NLV (which would include a value for the land in any event). Absent a meaningful calculation of NLV, the FLA is deficient for failure to provide sufficient information to establish financial responsibility, much less a prima facie case on which this Board could eventually base a valuation decision. This incompleteness is grounds for rejection of the FLA.

Actually, the line appears to Commenters to be in reasonably good shape. Commenters obtained preliminary "net liquidation value" estimates for the track, ties and other track material in this line based on review of BNSF track charts last year. Those estimates range from \$5.5 million (all scrap) to over \$11 million (all relay) (the basic range is indicated in Exhibit A). Based on a preliminary evaluation, the line appears to contain substantial (and perhaps dominant) amounts of reroll and relay quality steel. As a result, the steel and ties alone likely would command a value in excess of \$5 million even after

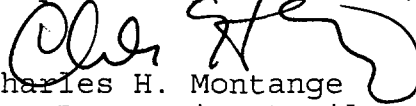
⁵ GCV is supposed to be forward looking, so presumably a GCV may still be calculated for the line based on reasonable expectations of future costs and revenues for the line. Given that the salvage value is likely high, and the traffic low (see Montana Rail Link letter, supra), Commenters believe any GCV for this line would be less than NLV.

⁶ Moreover, if the track and ties were all scrap as Dr. Fiehrer's analysis at p. 41 assumes, then Dr. Fiehrer has drastically understated operating costs elsewhere in the application, where he minimizes maintenance costs.

taking into account take-out and transportation costs. And while Commenters (like Dr. Fiehrer) certainly would appreciate a donation of the land if it ever became available for railbanking/trail purposes, Commenters anticipate a valuation of fee-owned parcels in the seven figures. Commenters would be prepared to enter into a binding contract for payment for the land alone in that range, should the line become available for trail or interim trail purposes. But Dr. Fiehrer's showing of financial responsibility is only about \$4.8 million. Fiehrer FLA, p. 121 of 125 at STB website. In short, the likely NLV of this line exceeds Dr. Fiehrer's showing of net worth for acquisition and operation.

This is an FLA for a line with no shippers and thus for no shippers, and, of course, therefore with no actual shipper support. On its face, the FLA is not for a feeder line at all. Moreover, the FLA has no calculation of NLV or GCV, and speculates the line is worth nothing. It basically seeks a donation. Due to the deficiencies in analysis of NLV or GCV, the financial responsibility of the applicant cannot be determined. There is no showing that shippers have received inadequate service; since there are no shippers, there can be no such showing. There is no showing that Dr. Fiehrer is likely to achieve an improvement over BNSF as owner of the line. In the end, there is no showing of any public purpose that would justify use of federal eminent domain powers to shift ownership of this property to Dr. Fiehrer at all. Commenters concur with BNSF's remedy: the FLA should not be accepted.

Respectfully submitted,



Charles H. Montange
for Recreation Trails, Inc.,
Eric Grove and Doug Monger

Att. Exhibit A

Certificate of Service

I certify service by deposit of copies of this letter on this date with an express service (next business day delivery) addressed to Robert Jenkins (counsel for BNSF) at Mayer Brown, et al., 199 K Street, N.W., WDC 20006, and by U.S. Mail, postage pre-paid, first class (express service not being available to P.O. Box addresses) upon M.A. Fiehrer (representative of Dr. Fiehrer) at P.O. Box 811, Helena, MT 59624-0811.

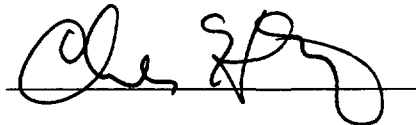


Exhibit A

TRACK CHART FOR Great Falls to Helena Jct., MT

Wt Rail	Grade	MP	MP	Distance	Tons	\$ Per Ton	Total
115	relay	116.2	118.2	2	404.8	525.00	\$212,520.00
132	relay	118.2	121.5	3.3	766.656	475.00	\$364,161.60
112	relay	121.5	121.7	0.2	39.424	475.00	\$18,726.40
132	relay	121.7	126.1	4.4	1022.208	475.00	\$485,548.80
112	relay	126.1	128	1.9	374.528	475.00	\$177,900.80
115	relay	128	134	6	1214.4	525.00	\$637,560.00
112	relay	134	153.05	19.05	3755.136	475.00	\$1,783,689.60
115	relay	153.05	153.4	0.35	70.84	525.00	\$37,191.00
112	relay	153.4	153.6	0.2	39.424	475.00	\$18,726.40
115	relay	153.6	154.2	0.6	121.44	525.00	\$63,756.00
112	relay	154.2	155.8	1.6	315.392	475.00	\$149,811.20
115	relay	155.8	155.9	0.1	20.24	525.00	\$10,626.00
112	relay	155.9	156.7	0.8	157.696	475.00	\$74,905.60
115	relay	156.7	156.9	0.2	40.48	525.00	\$21,252.00
112	relay	156.9	157.9	1	197.12	475.00	\$93,632.00
115	relay	157.9	158.2	0.3	60.72	525.00	\$31,878.00
112	relay	158.2	158.8	0.6	118.272	475.00	\$56,179.20
115	relay	158.8	159.5	0.7	141.68	525.00	\$74,382.00
112	relay	159.5	162.4	2.9	571.648	475.00	\$271,532.80
115	relay	162.4	162.6	0.2	40.48	525.00	\$21,252.00
112	relay	162.6	165.65	3.05	601.216	475.00	\$285,577.60
115	relay	165.65	166	0.35	70.84	525.00	\$37,191.00
112	relay	166	166.15	0.15	29.568	475.00	\$14,044.80
115	relay	166.15	166.35	0.2	40.48	525.00	\$21,252.00
112	relay	166.35	167.7	1.35	266.112	475.00	\$126,403.20
115	relay	167.7	168.05	0.35	70.84	525.00	\$37,191.00
112	relay	168.05	169.4	1.35	266.112	475.00	\$126,403.20
115	relay	169.4	169.65	0.25	50.6	525.00	\$26,565.00
112	relay	169.65	171.1	1.45	285.824	475.00	\$135,766.40
115	relay	171.1	171.3	0.2	40.48	525.00	\$21,252.00
112	relay	171.3	171.6	0.3	59.136	475.00	\$28,089.60
115	relay	171.6	171.7	0.1	20.24	525.00	\$10,626.00
112	relay	171.7	177.65	5.95	1172.864	475.00	\$557,110.40
115	relay	177.65	177.75	0.1	20.24	525.00	\$10,626.00
112	relay	177.75	178.2	0.45	88.704	475.00	\$42,134.40
115	relay	178.2	178.4	0.2	40.48	525.00	\$21,252.00
112	relay	178.4	178.95	0.55	108.416	475.00	\$51,497.60
115	relay	178.95	179.45	0.5	101.2	525.00	\$53,130.00
112	relay	179.45	180.5	1.05	206.976	475.00	\$98,313.60
115	relay	180.5	181	0.5	101.2	525.00	\$53,130.00
112	relay	181	181.87	0.87	171.4944	475.00	\$81,459.84
115	relay	181.87	182.35	0.48	97.152	525.00	\$51,004.80
112	relay	182.35	183.65	1.3	256.256	475.00	\$121,721.60
115	relay	183.65	184.1	0.45	91.08	525.00	\$47,817.00
112	relay	184.1	184.4	0.3	59.136	475.00	\$28,089.60
115	relay	184.4	184.55	0.15	30.36	525.00	\$15,939.00
112	relay	184.55	190.3	5.75	1133.44	475.00	\$538,384.00
115	relay	190.3	190.8	0.5	101.2	525.00	\$53,130.00
112	relay	190.8	194.5	3.7	729.344	475.00	\$346,438.40

115	relay	194.5	197.9	3.4	688.16	525.00	\$361,284.00
90	relay	197.9	198.48	0.58	91.872	210.00	\$19,293.12
112	relay	198.48	198.85	0.37	72.9344	475.00	\$34,643.84
115	relay	198.85	200.54	1.69	342.056	525.00	\$179,579.40
112	relay	200.54	200.8	0.26	51.2512	475.00	\$24,344.32
115	relay	200.8	201.64	0.84	170.016	525.00	\$89,258.40
90	scrap	201.64	201.75	0.11	17.424	210.00	\$3,659.04
115	relay	201.75	201.85	0.1	20.24	525.00	\$10,626.00
112	relay	201.85	202.19	0.34	67.0208	475.00	\$31,834.88
90	scrap	202.19	202.3	0.11	17.424	210.00	\$3,659.04
112	relay	202.3	202.51	0.21	41.3952	475.00	\$19,662.72
90	scrap	202.51	202.68	0.17	26.928	210.00	\$5,654.88
112	relay	202.68	203.3	0.62	122.2144	475.00	\$58,051.84
115	relay	203.3	203.75	0.45	91.08	525.00	\$47,817.00
112	relay	203.75	204.2	0.45	88.704	475.00	\$42,134.40
115	relay	204.2	204.7	0.5	101.2	525.00	\$53,130.00
112	relay	204.7	204.84	0.14	27.5968	475.00	\$13,108.48
90	scrap	204.84	205.35	0.51	80.784	210.00	\$16,964.64
115	relay	205.35	205.55	0.2	40.48	525.00	\$21,252.00
90	scrap	205.55	205.75	0.2	31.68	210.00	\$6,652.80
115	relay	205.75	205.95	0.2	40.48	525.00	\$21,252.00
90	scrap	205.95	206.69	0.74	117.216	210.00	\$24,615.36
115	relay	206.69	206.8	0.11	22.264	525.00	\$11,688.60
90	scrap	206.8	207	0.2	31.68	210.00	\$6,652.80
112	relay	207	207.55	0.55	108.416	475.00	\$51,497.60
115	relay	207.55	208.13	0.58	117.392	525.00	\$61,630.80
112	relay	208.13	208.25	0.12	23.6544	475.00	\$11,235.84
90	scrap	208.25	208.6	0.35	55.44	210.00	\$11,642.40
112	relay	208.6	208.88	0.28	55.1936	475.00	\$26,216.96
90	scrap	208.88	210.35	1.47	232.848	210.00	\$48,898.08
115	relay	210.35	210.68	0.33	66.792	525.00	\$35,065.80
112	relay	210.68	210.9	0.22	43.3664	475.00	\$20,599.04
				94.7	18888.78		\$9,020,377.52

OTM

relay	3658.956	400	\$1,463,582.21
scrap	594	225	\$133,650.00

TIES

\$6,500.00 per mile	\$615,550.00
TOTAL	\$11,233,159.73

TRACK CHART FOR Great Falls to Helena Jct., MT

Wt Rail	Grade	MP	MP	Distance	Tons	\$ Per Ton	Total
115	scrap	116.2	118.2	2	404.8	210.00	\$85,008.00
132	scrap	118.2	121.5	3.3	766.656	210.00	\$160,997.76
112	scrap	121.5	121.7	0.2	39.424	210.00	\$8,279.04
132	scrap	121.7	126.1	4.4	1022.208	210.00	\$214,663.68
112	scrap	126.1	128	1.9	374.528	210.00	\$78,650.88
115	scrap	128	134	6	1214.4	210.00	\$255,024.00
112	scrap	134	153.05	19.05	3755.136	210.00	\$788,578.56
115	scrap	153.05	153.4	0.35	70.84	210.00	\$14,876.40
112	scrap	153.4	153.6	0.2	39.424	210.00	\$8,279.04
115	scrap	153.6	154.2	0.6	121.44	210.00	\$25,502.40
112	scrap	154.2	155.8	1.6	315.392	210.00	\$66,232.32
115	scrap	155.8	155.9	0.1	20.24	210.00	\$4,250.40
112	scrap	155.9	156.7	0.8	157.696	210.00	\$33,116.16
115	scrap	156.7	156.9	0.2	40.48	210.00	\$8,500.80
112	scrap	156.9	157.9	1	197.12	210.00	\$41,395.20
115	scrap	157.9	158.2	0.3	60.72	210.00	\$12,751.20
112	scrap	158.2	158.8	0.6	118.272	210.00	\$24,837.12
115	scrap	158.8	159.5	0.7	141.68	210.00	\$29,752.80
112	scrap	159.5	162.4	2.9	571.648	210.00	\$120,046.08
115	scrap	162.4	162.6	0.2	40.48	210.00	\$8,500.80
112	scrap	162.6	165.65	3.05	601.216	210.00	\$126,255.36
115	scrap	165.65	166	0.35	70.84	210.00	\$14,876.40
112	scrap	166	166.15	0.15	29.568	210.00	\$6,209.28
115	scrap	166.15	166.35	0.2	40.48	210.00	\$8,500.80
112	scrap	166.35	167.7	1.35	266.112	210.00	\$55,883.52
115	scrap	167.7	168.05	0.35	70.84	210.00	\$14,876.40
112	scrap	168.05	169.4	1.35	266.112	210.00	\$55,883.52
115	scrap	169.4	169.65	0.25	50.6	210.00	\$10,626.00
112	scrap	169.65	171.1	1.45	285.824	210.00	\$60,023.04
115	scrap	171.1	171.3	0.2	40.48	210.00	\$8,500.80
112	scrap	171.3	171.6	0.3	59.136	210.00	\$12,418.56
115	scrap	171.6	171.7	0.1	20.24	210.00	\$4,250.40
112	scrap	171.7	177.65	5.95	1172.864	210.00	\$246,301.44
115	scrap	177.65	177.75	0.1	20.24	210.00	\$4,250.40
112	scrap	177.75	178.2	0.45	88.704	210.00	\$18,627.84
115	scrap	178.2	178.4	0.2	40.48	210.00	\$8,500.80
112	scrap	178.4	178.95	0.55	108.416	210.00	\$22,767.36
115	scrap	178.95	179.45	0.5	101.2	210.00	\$21,252.00
112	scrap	179.45	180.5	1.05	206.976	210.00	\$43,464.96
115	scrap	180.5	181	0.5	101.2	210.00	\$21,252.00
112	scrap	181	181.87	0.87	171.4944	210.00	\$36,013.82
115	scrap	181.87	182.35	0.48	97.152	210.00	\$20,401.92
112	scrap	182.35	183.65	1.3	256.256	210.00	\$53,813.76
115	scrap	183.65	184.1	0.45	91.08	210.00	\$19,126.80
112	scrap	184.1	184.4	0.3	59.136	210.00	\$12,418.56
115	scrap	184.4	184.55	0.15	30.36	210.00	\$6,375.60
112	scrap	184.55	190.3	5.75	1133.44	210.00	\$238,022.40
115	scrap	190.3	190.8	0.5	101.2	210.00	\$21,252.00
112	scrap	190.8	194.5	3.7	729.344	210.00	\$153,162.24

115	scrap	194.5	197.9	3.4	688.16	210.00	\$144,513.60
90	scrap	197.9	198.48	0.58	91.872	210.00	\$19,293.12
112	scrap	198.48	198.85	0.37	72.9344	210.00	\$15,316.22
115	scrap	198.85	200.54	1.69	342.056	210.00	\$71,831.76
112	scrap	200.54	200.8	0.26	51.2512	210.00	\$10,762.75
115	scrap	200.8	201.64	0.84	170.016	210.00	\$35,703.36
90	scrap	201.64	201.75	0.11	17.424	210.00	\$3,659.04
115	scrap	201.75	201.85	0.1	20.24	210.00	\$4,250.40
112	scrap	201.85	202.19	0.34	67.0208	210.00	\$14,074.37
90	scrap	202.19	202.3	0.11	17.424	210.00	\$3,659.04
112	scrap	202.3	202.51	0.21	41.3952	210.00	\$8,692.99
90	scrap	202.51	202.68	0.17	26.928	210.00	\$5,654.88
112	scrap	202.68	203.3	0.62	122.2144	210.00	\$25,665.02
115	scrap	203.3	203.75	0.45	91.08	210.00	\$19,126.80
112	scrap	203.75	204.2	0.45	88.704	210.00	\$18,627.84
115	scrap	204.2	204.7	0.5	101.2	210.00	\$21,252.00
112	scrap	204.7	204.84	0.14	27.5968	210.00	\$5,795.33
90	scrap	204.84	205.35	0.51	80.784	210.00	\$16,964.64
115	scrap	205.35	205.55	0.2	40.48	210.00	\$8,500.80
90	scrap	205.55	205.75	0.2	31.68	210.00	\$6,652.80
115	scrap	205.75	205.95	0.2	40.48	210.00	\$8,500.80
90	scrap	205.95	206.69	0.74	117.216	210.00	\$24,615.36
115	scrap	206.69	206.8	0.11	22.264	210.00	\$4,675.44
90	scrap	206.8	207	0.2	31.68	210.00	\$6,652.80
112	scrap	207	207.55	0.55	108.416	210.00	\$22,767.36
115	scrap	207.55	208.13	0.58	117.392	210.00	\$24,652.32
112	scrap	208.13	208.25	0.12	23.6544	210.00	\$4,967.42
90	scrap	208.25	208.6	0.35	55.44	210.00	\$11,642.40
112	scrap	208.6	208.88	0.28	55.1936	210.00	\$11,590.66
90	scrap	208.88	210.35	1.47	232.848	210.00	\$48,898.08
115	scrap	210.35	210.68	0.33	66.792	210.00	\$14,026.32
112	scrap	210.68	210.9	0.22	43.3664	210.00	\$9,106.94
				94.7	18888.78		\$3,966,643.30

OTM

scrap	3658.956	225	\$823,264.99
scrap	594	225	\$133,650.00

TIES

\$6,500.00 per mile	\$615,550.00
TOTAL	\$5,539,108.29