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December 11, 2006

Via HAND DELIVERY

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, NW
Washington, D.C. 20423



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

Dear Secretary Williams:

Counsel for the shippers and shipper associations who have filed joint opening and reply comments in the captioned matter have filed a motion requesting an extension of the deadline for filing rebuttal comments in this proceeding to January 18, 2007. Based on the representation that petitioners request the extension to evaluate the AAR's proposal regarding the maximum value of a small rate case, AAR and its Class I member railroads who are participating in this proceeding have no objection to the extension. AAR would also welcome discussion with petitioners to seek common ground on approaches to support the Board's objectives in this proceeding.

Sincerely,

ENTERED
Office of Proceedings

DEC 11 2006

Part of
Public Record

Samuel M. Sipe, Jr. by FJH

Samuel M. Sipe, Jr.
Counsel for Association of American
Railroads

cc: Parties of Record