



KYLE PITSOR

Vice President, Government Relations

June 4, 2007

Mr. Vernon Williams
Secretary
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Ex Parte No. 656 (Sub No. 1), Reply in Opposition to Request for Extension of Time

Dear Secretary Williams,

The National Electrical Manufacturers Association strongly opposes the May 18, 2007 request by the National Classification Committee (NCC) and the National Motor Freight Traffic Association (NMFTA) for an extension of time for compliance with the Board's May 7, 2007 decision to terminate the NCC's antitrust immunity.

NEMA is the trade association of choice for the electrical manufacturing industry. Founded in 1926 and headquartered near Washington, D.C., its approximately 450 member companies manufacture products used in the generation, transmission and distribution, control, and end-use of electricity. These products are used in utility, medical imaging, industrial, commercial, institutional, and residential applications. Domestic production of electrical products sold worldwide exceeds \$120 billion.

NEMA's position, communicated to the Board in February and December 2005, has not changed. Maintaining the special status of antitrust immunity for the NCC sets customers and other end users of the trucking industry at a competitive disadvantage. The current climate supports negotiated rates between shippers and their carriers. These market-driven competitive actions effectively negate the need for an antiquated, protected, and bureaucratic regime mandated by the NCC. NCC has failed to provide adequate arguments to support its extension request.

NEMA urges the Board to terminate the NCC's antitrust immunity as expeditiously as possible. Accordingly, NEMA urges the Board to deny NCC's extension request and retain the September 4 effective date.

**National Electrical
Manufacturers Association**

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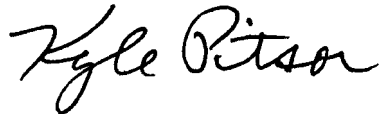
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Thank you for your attention to the comment of the National Electrical Manufacturers Association. Should you have any questions or comments with regard to this matter or other matters of interest, I may be reached at (703) 841-3274 or kyl_pitsor@nema.org. You may also contact Craig Updyke, Manager, Trade and Commercial Affairs, at (703) 841-3294 or cra_updyke@nema.org.

Sincerely,

A handwritten signature in black ink that reads "Kyle Pitsor". The signature is written in a cursive, flowing style.

Kyle Pitsor