



National Grain and Feed Association

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January 3, 2008

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
395 E. Street, S.W.
Washington, D.C. 20423

Re: Ex Parte 385 (Sub-No. 6) WAYBILL SAMPLE, Decision served December 17, 2007

Dear Secretary Williams:

The National Grain and Feed Association (NGFA) hereby joins in the December 31 petition filed by the National Industrial Transportation League ("League"), requesting reconsideration of the Board's Clarification issued on December 17, 2007 in the above-captioned proceeding. The Board determined in that Clarification that all railroads required to submit a waybill sample under 49 CFR Part 1244 shall report fuel surcharge revenue in the waybill sample field "Freight Revenue."

As stated fully in the League's petition, fuel surcharge revenue cannot be evaluated if it is simply folded into all other revenue. Some railroads already report fuel surcharge revenue separately under the waybill sample field for "Miscellaneous Charges." The Board also earlier committed to transparency in the use and reporting of fuel surcharges. NGFA agrees that reporting of revenues by the railroads in the waybill sample should be consistent, but to blend fuel surcharge revenue into all other revenue would be a significant step back. Instead, the revenue from fuel surcharges should be reported in a separate and specific field, or at least separately under the field for "Miscellaneous Charges" as it is already reported by some railroads.

Respectfully submitted,

Kendell W. Keith
President