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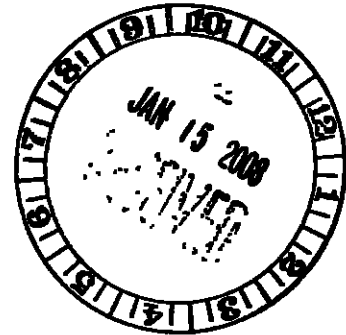
Mike Salvino
Manager, Global Sourcing

6400 POPLAR AVENUE
T1, 4-021
MEMPHIS, TN 38197

T (901) 419-7052
F (901) 214-1811

January 14, 2008

The Honorable Vernon A Williams
Secretary
Surface Transportation Board
395 E St SW
Washington, D C 20423



RE Ex Parte 385(Sub-No 6), Waybill Sample, decision served 12/17/2007

Dear Secretary Williams

This is a letter-petition for reconsideration, pursuant to 40 C F R 1115.3

The Board's 12/17/2007 Clarification, instead of promoting transparency, will make it impossible to identify fuel surcharge revenues in the Waybill Sample, and thereby to use the Waybill Sample to analyze fuel surcharge revenue, and to match fuel costs to fuel surcharge revenue

Our position mirrors the National Industrial Transportation League (in which we are a member), and believes strongly that the Board should promote transparency in the reporting of fuel surcharge revenue and that the fuel surcharge revenue should be reported separately rather than combined with total revenue

Thank you for your consideration of our petition

Sincerely,



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