

# TOTAL PETROCHEMICALS

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January 21, 2008

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

RE: Ex Parte 385 (Sub-No 6), *Waybill Sample*, Decision served on December 17, 2007

Dear Secretary Williams:

TOTAL PETROCHEMICALS USA, INC. ("TOTAL") is one of the five largest producers of petrochemicals, base chemicals and transportation fuels in the United States. We are headquartered in Houston, Texas and have manufacturing facilities in Texas and Louisiana as well as a research and technology facility in La Porte, Texas and a refinery in Port Arthur, Texas. We ship our products primarily by rail, as rail, for the most part, represents the only feasible option available to accommodate the volume of product we ship. As a rail shipper, we are keenly interested in the Board's recent decision relating to the Waybill Sample reporting of fuel surcharge revenues.

TOTAL is writing today to express our support for the December 31 petition filed by the National Industrial Transportation League (NITL) requesting reconsideration of the Board's Clarification in the above-captioned proceeding.

TOTAL understands that the Clarification was issued because some carriers were separately reporting fuel surcharge revenue in the "Miscellaneous Charges" field of the Waybill Sample, rather than the Freight Revenue field, and because the Board desired to insure that all carriers were reporting fuel surcharge revenue in a consistent manner. TOTAL agrees that revenue reporting should be consistent, but blending fuel surcharge revenue into all other revenue represents a significant step backward with respect to the Board's commitment to transparency in the use and reporting of fuel surcharges.

Therefore, TOTAL respectfully requests the Board to reconsider and revise the Clarification to provide that all carriers should consistently report fuel surcharge revenue separately in a Waybill Sample field established for that purpose.

Respectfully submitted,

TOTAL PETROCHEMICALS USA, INC.

By

  
Richard L. Charter, II

Sr. Vice President - IISSE and Government Affairs



TOTAL

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