

August 18, 2008

Anne K. Quinlan, Esq.
Acting Secretary
Surface Transportation Board
395 E Street, S W, Suite 1260
Washington, DC 20423-0001

Re Ex Parte No 646 (Sub-No 2)
Simplified Standards for Rail Rate Cases – Taxes in Revenue Shortfall Allocation Method

Dear Secretary Quinlan

On August 1, 2008, Interested Parties filed Joint Comments in the above referenced proceeding. The Cover Page was inadvertently copied from a previous filing and did not correctly list the parties sponsoring this filing. Please find attached for filing, a revised Cover Page.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Nicholas J. DiMichael
Attorney for Interested Parties

BEFORE THE
SURFACE TRANSPORTATION BOARD

Ex Parte No 646 (Sub-No. 2)

*SIMPLIFIED STANDARDS FOR RAIL RATE CASES—
TAXES IN REVENUE SHORTFALL ALLOCATION METHOD*

Joint Comments

submitted by

American Chemistry Council, Colorado Wheat Administrative Committee, Colorado Association of Wheat Growers, The Fertilizer Institute, Glass Producers Transportation Council, Idaho Barley Commission, Idaho Grain Producers Association, Idaho Wheat Commission, Institute of Scrap Recycling Industries, Montana Grain Growers, Montana Farmers Union, Montana Wheat and Barley Committee, National Grain and Feed Association, The National Industrial Transportation League, Nebraska Wheat Board, North Dakota Grain Dealers Association, North Dakota Public Service Commission, Oklahoma Wheat Commission, South Dakota Wheat Commission, Texas Wheat Producers Board, Washington Wheat Commission, Washington Association of Wheat Growers, South Wheat Inc., Alliance for Rail Competition, Consumers United for Rail Equity and The Honorable Brian Schweitzer, Governor, State of Montana

In accordance with the Notice served June 27, 2008 in this proceeding ("Notice"), the above-listed parties ("Interested Parties") submit these Joint Comments. The Interested Parties are the same parties that filed joint comments in Ex Parte No. 646 (Sub-No. 1)—*Simplified Standards for Rail Rate Cases*, under the same name. In support of their comments, the Interested Parties have attached the Verified Statement of Thomas D. Crowley ("Crowley V.S.") (Attachment A) and relevant excerpts from the publicly filed reply evidence submitted by E.I. du