

 **HIGHROAD CONSULTING, LTD.**
Linking Logistics to Profitability

224958
Sandra Dearden, President

April 23, 2009

Surface Transportation Board
Attn: STB Ex Parte No. 431 (Sub-No. 3)
395 E Street S.W.
Washington, DC 20423-0001

RE: Review of the Surface Transportation Board's General Costing System

Please add my name and address to the service list as a party of record with intent to participate in this proceeding.

PARTY OF RECORD

Sandra J. Dearden, President
HIGHROAD Consulting, Ltd.
55 East Jackson, Blvd., Suite 625
Chicago, IL 60604

While my comments will be brief, my testimony will require 10 - 15 minutes. The primary focus will be on historical studies used in URCS, the statistical relationships used in URCS, and the need for an over-all validity test of the URCS model. I will also offer some brief comments on the following questions and issues:

Question 1: The efficiency adjustments associated with unit-train and multi-car movements;

Question 3: Costing of trailer or container on flat car (TOFC/COFC) traffic;

Question 5: Non-Intermodal intertrain/intratrain (I&I) switches by URCS car type; and

Question 11: Spotted to pulled factor for each car type.

This original is being filed electronically.

Sincerely,



55 East Jackson Boulevard, Suite 625
Chicago, Illinois 60604
Phone: (312) 765-0250 • Fax: (312) 765-0396
email: s.dearden@highroadconsulting.com