

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Ex Parte 704 (Sub-No. 1)**REVIEW OF COMMODITY, BOXCAR, AND TOFC/COFC EXEMPTIONS**

REQUEST FOR EXTENSION OF TIME TO SUBMIT MEMORANDA**Submitted by****AMERICAN FOREST & PAPER ASSOCIATION AND
INSTITUTE OF SCRAP RECYCLING INDUSTRIES, INC.**

The American Forest & Paper Association (“AF&PA”) and the Institute of Scrap Recycling Industries, Inc. (“ISRI”) hereby submit this request for extension of time for the submission of memoranda summarizing the ex parte communications between certain of their member companies and/or association representatives with each member of the Surface Transportation Board (“Board” or “STB”). On March 18, 2019, the Board issued a decision in the above-captioned proceeding authorizing informal discussions between Board members and industry stakeholders and requiring the parties engaged in ex parte communications to submit memoranda summarizing the ex parte communications to the Board member office with whom the meeting was held no later than two business days after the ex parte communication.¹

AF&PA, ISRI and certain of their respective members have held twenty four ex parte meetings with each Board member between June 4, 2019 and June 12, 2019.² Twelve more ex parte meetings with individual Board members are scheduled on June 13 and 14. Currently,

¹ Review of Commodity, Boxcar, and TOFC/COFC Exemptions, EP 704 (Sub-No. 1) (STB Served March 19, 2019).

² The scheduling of the large number of ex parte meetings during the last two weeks in June was due in part to the desires of the associations and certain of their member companies to participate in the Board’s demurrage hearing held on May 22-23 in Ex Parte 754 and the intervening Memorial Day holiday.

AF&PA and ISRI have submitted nine memoranda summarizing the ex parte communications with each Board member. AF&PA and ISRI and their respective members are working to prepare and review the memoranda as quickly as possible. However, due to the large number of back to back meetings, AF&PA and ISRI, and their respective members have not been able to timely submit the memoranda within the required 2 business days, and submit that they will not be able to comply with the 2 business days period for the outstanding memoranda that are or will be due to the Board.

For these reasons, AF&PA and ISRI, on behalf of their respective members and the association staff who have engaged or are scheduled to engage in ex parte meetings through June 14, 2019, respectfully request the Board to extend the time to submit memoranda for all such ex parte communications to no later than June 21, 2019. AF&PA and ISRI, and their respective members, will continue to submit to the Board members' offices on a rolling basis the summary memoranda for all outstanding ex parte communications as quickly as is possible.

Respectfully submitted,

*American Forest & Paper Association and
Institute of Scrap Recycling Industries, Inc.*

By its attorney:

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