

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Ex Parte No. 759

DEMURRAGE BILLING REQUIREMENTS

ENTERED
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Public Record

**COMMENTS OF
NORFOLK SOUTHERN RAILWAY COMPANY**

Norfolk Southern Railway Company (“Norfolk Southern”) joins the comments of the Association of American Railroads in this proceeding asking the Board to withdraw that portion of the Notice of Proposed Rulemaking (“NPRM”) under subheading B (Issuing Demurrage Invoices Directly to Shippers Instead of Warehousemen). Norfolk Southern also files these separate comments related to that portion of the NPRM under subheading A (Requirements for Demurrage Invoices).

Although Norfolk Southern does not oppose the specific categories of additional information that the Board intends to require Class I carriers to include on demurrage invoices, there would be a substantial amount of IT programming required to make this additional information available to invoice recipients. Accordingly, Norfolk Southern respectfully requests that the Board allow a minimum of three months after the adoption of any final rule in this proceeding before the invoice requirements go into effect in order for rail carriers to complete the necessary systems upgrades to effectuate these changes.

Respectfully Submitted,

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