

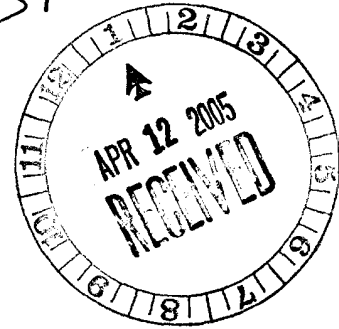


ASSOCIATION OF
AMERICAN RAILROADS

Law Department

Dennis J. Starks
Senior Commerce Counsel

213759



BY HAND DELIVERY

April 12, 2005

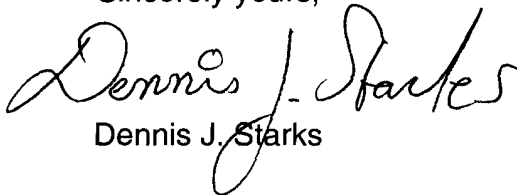
Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423

Re: **Notice of Intent to Participate** in Ex Parte No. 657, Rail
Rate Challenges Under The Stand-Alone Cost Methodology

Dear Secretary Williams:

The AAR intends to file written testimony in this proceeding. The AAR also intends to speak at the scheduled April 26, 2005, hearing in this proceeding and request an allotment of time up to 5 minutes.

Sincerely yours,


Dennis J. Starks