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Ms. Cynthia Brown  
Chief, Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W.  
Washington, D.C. 20423

RE: EP 704 (Sub-No.1), Review of Commodity, Boxcar, and TOFC/COFC Exemptions

Dear Ms. Brown:

The Portland Cement Association (PCA) is the leading voice for the U.S. cement manufacturing industry. It represents more than 92% of U.S. cement manufacturing capacity. PCA members operate manufacturing plants in 33 states, with distribution terminals in all 50 states, servicing nearly every Congressional district. Founded in 1916, PCA is the widely-recognized authority on the technology, economics, and applications of cement and concrete.

PCA appreciates the opportunity to submit comments on the Notice of Proposed Rulemaking EP-704 Review of Commodity, Boxcar, and TOFC/COFC Exemptions. Because of the sensitive nature of the economics, we respectfully request a 60-day extension in order to fully gather and evaluate information for formal submission. We understand that the Association of American Railroads has also requested an extension. PCA hopes the Surface Transportation Board will grant an extension to allow stakeholders sufficient time to present comments on these important issues. Please feel free to contact my colleague, Hilary Moffett, via email at [hmoффett@cement.org](mailto:hmoффett@cement.org). We look forward to working with you.

Regards,



Michael Schon  
V.P., Counsel of Government Affairs  
Portland Cement Association