

Seattle, Washington
September 5, 1975
Law Department

S. J. Barry
Superintendent - Transportation
Tacoma

Re: Idaho Intrastate Rates and Charges 310 and 313
Law Department Commerce File 517

This will confirm my telephone message to your office to the effect that I have been advised this afternoon that I will be required to attend depositions scheduled by the Securities and Exchange Commission beginning Monday morning and continuing through the week. I will, therefore, be unable to meet with you at 10:00 a.m. on Monday. I hope to reach you by telephone during a break in the proceedings and arrange to meet with you prior to our trip to Idaho on the 17th.

I have enclosed for your review, verified statements prepared in connection with Montana proceedings where we were asking the Interstate Commerce Commission to raise the level of intrastate rates to the interstate level. I believe the same sort of operating statement would be appropriate in the case at hand.

I believe that you can use the statement of Howard Neff, our trainmaster at Deer Lodge, as a format for your testimony. You will note that he devotes some space to his background with the company, demonstrating a qualification with regard to operating matters and, particularly, matters in the state under consideration. In our case, it would be helpful for you to have information with regard to the operations of the WI&M as well as the Milwaukee. I realize that

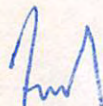
Mr. Barry

-2-

September 5, 1975

the operating conditions in Idaho with regard to the log movements are substantially different from the Montana intrastate movements; however, I believe Mr. Neff's statement will give you an idea of the type of case we are trying to establish.

I have also enclosed the verified statement O. E. Stevens, Director of Transportation for the Burlington Northern at Billings. Mr. Steven's statement was entered in the same proceeding and, generally, goes to the same evidentiary points. After you have had an opportunity to review the two statements, it would be helpful if you would note down your thoughts on your testimony for the Idaho proceeding, and if we are unable to get together, we can at least review them over the telephone.



J. Fred Simpson
General Attorney

JFS:njo
Encs.