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December 17, 2019

300196

VIA ELECTRONIC FILING

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W., Room 1034
Washington, DC 20423-0001

ENTERED
Office of Proceedings
December 17, 2019
Part of
Public Record

Re: **Docket No. FD 36346**
Wisconsin Central Ltd. -- Operation Exemption --
Hallett Dock No. 5 in Duluth, Minnesota

Dear Ms. Brown:

Petitioner Wisconsin Central Ltd. ("WCL") respectfully requests that the Board close the record in this matter and proceed to issue a decision by **January 30, 2020**, to be effective by **February 29, 2020**, granting WCL an exemption to operate the rail/marine dock facility in Duluth, Minnesota known as Hallett Dock No. 5.

WCL filed its petition for exemption and a petition for establishment of procedural schedule on November 8, 2019. By decision served November 22, 2019, and at WCL's request, the Board instituted an exemption proceeding under 49 U.S.C. § 10502(b) and set December 13, 2019 as the due date for comments on WCL's petition for exemption. No such comments have been filed, and WCL's petition for exemption is unopposed. While the November 22nd decision allows WCL to file a response to any comments by January 2, 2020, WCL's response is unnecessary as no comments were filed.

WCL and the seller, Hallett Dock Company ("Hallett"), are pursuing their integration planning for the conveyance of Hallett Dock No. 5 and are committed to closing the transaction in early March if an STB decision is effective by that time. Particularly in light of the unopposed nature of WCL's petition, issuance of a decision by January 30, 2020 – nearly three months after the filing of the petition, and more than six weeks from now – would be a reasonable accommodation of the parties' interests to expedite this proceeding given that Hallett as a non-carrier could have pursued a sale of Hallett Dock No. 5 to another party without the need for agency approval. Hallett continues to strongly support an expeditious decision by the Board, as shown in its attached letter.

FLETCHER & SIPPEL LLC

Ms. Cynthia T. Brown

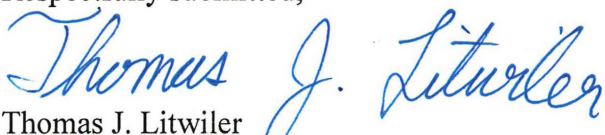
December 17, 2019

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WCL also is attaching a support statement from Cleveland-Cliffs, Inc., a current user of Hallett Dock No. 5 which supports WCL's petition to operate the dock.

Please feel free to contact me if you have any questions regarding this matter.
Thank you for your assistance.

Respectfully submitted,


Thomas J. Litwiler
Attorney for Wisconsin Central Ltd.

TJL:bs

Attachments



*World Gateway for Transloading
& Storage of Bulk Commodities*

P.O. Box 16447 • Duluth, Minnesota 55816-0447
Phone 218-628-2281 • Fax 218-628-2284 • 1-800-637-4497

December 17, 2019

Cynthia T. Brown
Chief of the Section of Administration, Office of Proceedings
Surface Transportation Board
395 E St SW
Washington, DC 20423

Re: Docket No. FD 36346
Wisconsin Central Ltd. – Operation Exemption –
Hallett Dock No. 5 in Duluth, Minnesota

Dear Ms. Brown,

Hallett Dock Company strongly supports the Wisconsin Central Ltd.'s request that the Board close the record for Docket No. FD 36346, Wisconsin Central Ltd. -- Operation Exemption -- Hallett Dock No. 5 in Duluth, Minnesota and proceed to issue a decision by **January 30, 2020**, to be effective by **February 29, 2020**, thereby granting WCL an exemption to operate the rail/marine dock facility in Duluth, Minnesota known as Hallett Dock No. 5. Both parties are committed to closing the transaction in early March if an STB decision is effective by that time.

Sincerely,


J. M. McCoshen
President



CLEVELAND-CLIFFS INC.

200 Public Square, Suite 3300, Cleveland, OH 44114

P 216.694.5700 clevelandcliffs.com

December 11, 2019

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

Re: *Wisconsin Central Ltd. – Operation Exemption – Hallett Dock No. 5 in Duluth, Minnesota, STB Docket No. FD 36346*

Dear Ms. Brown:

Cleveland-Cliffs Inc. ("Cliffs") is one of the largest producer of iron ore pellets serving steel producers in North America. Cliffs currently utilizes rail/water transfer services at Hallett Dock No. 5 in Duluth, Minnesota to receive limestone from Great Lakes vessels for delivery by rail to the company's United Taconite facility near Forbes, Minnesota.

Cliffs supports Wisconsin Central Ltd.'s ("WCL") Petition for Exemption to operate Hallett Dock No. 5. WCL's proposed operation of the dock maintains that important facility needed for the delivery of limestone to the United Taconite mine. Another potential buyer may not have continued current rail/water operations at Hallett Dock No. 5. We rely on ongoing availability of Hallett Dock No. 5 for limestone supply so that we can produce flux pellets for our steel customers.

WCL currently provides rail transportation to Cliffs, including in Minnesota, and we have a productive partnership. We look forward to extending that relationship to WCL's future operation of Hallett Dock No. 5. Cliffs asks the Board to approve WCL's Petition.

Sincerely,

A handwritten signature in black ink that reads "Terrence R. Mee".

Terrence R. Mee
Executive Vice President – Global Commercial