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Via Electronic Filing

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

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Re: Docket No. FD 35068, *Soo Line Railroad Company d/b/a Canadian Pacific Railway – Acquisition and Operation Exemption – BNSF Railway Company*

Dear Ms. Brown:

At oral argument in this proceeding, the Board appeared interested in the level of service that New Century Ag (“NCA”) was receiving from Soo Line Railroad Company d/b/a Canadian Pacific (“CP”). In follow up to that line of discussion, CP submits this letter to update the Board as to CP service to NCA, including car volumes and some of CP’s efforts both to ensure NCA and other CP origins remain competitive and to increase efficiency.

In the 2019/2020 crop year, NCA is { [REDACTED] } Table 1 below shows the actual volumes of traffic originating at NCA’s Noonan and Westby facilities for the calendar year 2019. For comparison, CP includes volumes for the prior two calendar years. These facilities are located on the line that CP purchased and rehabilitated in 2007 and are { [REDACTED] }.

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As shown in Table 1, in 2019 {

Table 1
Total Cars (manifest and unit train)
Handled by CP from Noonan and Westby {

}

As shown in Table 2 below, {

Table 2
CP DTS Train Service Noonan and Westby {

}

Additionally, as part of CP's 2020 strategy of competitiveness and transparency, CP recently moved much of its private contract pricing for agricultural commodities to tariff. In the process, CP reduced its tariff pricing on corn, soybeans and wheat to the PNW, Duluth/Superior and the Eastern Milling Markets. CP's rates including fuel surcharge, are competitive with BNSF's rates.

Currently, CP is working with NCA and the DMVW to test shipping {

} Notably, this increase requires no additional infrastructure investment from the customer.

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Lastly, as CP previously advised the Board, CP is in the midst of a four-year plan to take delivery of 5,900 new, high efficiency grain hoppers. These new cars, despite being shorter in length, can carry approximately 10 percent more grain by weight and 15 percent more grain by volume than the older grain cars. CP currently has 3,000 of the high efficiency cars on line and expects to have an additional 300 on line by the end of 2020.

Please let me know if you have any questions.

Sincerely,

Stinson LLP

/s/ David F. Rifkind

David F. Rifkind

cc: Edward D. Greenberg, Esq. (egreenberg@gkglaw.com), *counsel for NCA*
Peter W. Denton, Esq. (pdenton@steptoe.com), *counsel for BNSF*