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October 6, 2020

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VIA ELECTRONIC FILING

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

ENTERED
Office of Proceedings
October 6, 2020
Part of
Public Record

Re: **Docket No. FD 36438**
Watco Holdings, Inc. — Continuance in Control
Exemption — Elwood Joliet & Southern Railroad, L.L.C.

Dear Ms. Brown:

On September 24, 2020, Watco Holdings, Inc. (“Watco”) filed a notice of exemption (the “Control Notice”) pursuant to 49 C.F.R. § 1180.2(d)(2) to continue in control of Elwood Joliet & Southern Railroad, L.L.C. (“EJSR”) upon EJSR’s consummation of the lease transaction encompassed by *Elwood Joliet & Southern Railroad, L.L.C. — Lease and Operation Exemption — Wisconsin Central Ltd.*, FD 36437 (also filed on September 24, 2020). In its Control Notice, Watco correctly stated that it currently controls one Class II rail carrier and thirty-eight Class III rail carriers, and offered as an appendix to that filing a list supplying the name of each of the thirty-nine Watco-controlled carriers and that state (or states) within which each carrier operates. Among the listed carriers is Bogalusa Bayou Railroad, L.L.C. (“BBAY”), which also does business under the trade name Geaux Geaux Railroad (“Geaux Geaux”). As the Watco Notice reflects, Geaux Geaux is not an additional, distinct carrier separate and apart from BBAY.

Watco is aware that, in a notice of exemption filed on Watco’s behalf in *Watco Holdings, Inc. — Continuance in Control Exemption — Savannah & Old Fort R.R.*, FD 36337 (“*Watco-Savannah*”), Geaux Geaux (or, more accurately a non-existent entity identified in that filing as “Geaux Geaux River”) is identified as a carrier separate and apart from BBAY. The Board observed that Geaux Geaux was not among the carriers listed in a Watco control proceeding contemporaneous to *Watco-Savannah*, and that BBAY and Geaux Geaux are listed separately on Watco’s website. *Watco Holdings, Inc. — Continuance in Control Exemption — Wisconsin Rapids Railroad, L.L.C.*, FD 36340 (STB served Aug. 16, 2019) (“*Watco-Wisconsin*”), 2 n.1. The

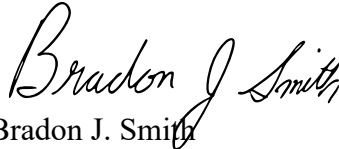
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inclusion of “Geaux Geaux River” in *Watco-Savannah* was in error – one, incidentally, that has been avoided in subsequent Watco filings.

The list of Watco-controlled carriers in the Control Notice is correct, as was the content of Watco’s notice of exemption in *Watco-Wisconsin*. BBAY consists of two separate operations – one based in Bogalusa, Louisiana, doing business as Bogalusa Bayou Railroad, and the other based out of Baton Rouge, doing business as Geaux Geaux Railroad – consistent with the notice of exemption that BBAY filed in obtaining authority to acquire the Baton Rouge rail assets that became the Geaux Geaux component of BBAY’s current operations. *Bogalusa Bayou Railroad, L.L.C. d/b/a Geaux Geaux Railroad – Operation Exemption – Geaux Geaux Railroad, LLC*, FD 35904 (notice of exemption filed January 29, 2015), 4 n. 2 (BBAY “will do business as Geaux Geaux Railroad at the request of the owner of the lines”).

The information offered hereby does not amend, revise, or clarify any element of the Control Notice, which is accurate and complete. Accordingly, the Control Notice should be accepted and processed in a timely basis as originally submitted, as the Board did in *Watco-Wisconsin*.

Respectfully submitted,

A handwritten signature in black ink, reading "Bradon J. Smith". The signature is written in a cursive, flowing style.

Bradon J. Smith
Attorney for Watco Holdings, Inc.

Cc: All parties of record