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March 17, 2021

VIA ELECTRONIC FILING

Mr. William Brennan, Director
Attention: Alexander Dusenberry
Office of Economics
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: **WB 21-16; Release of waybill data requested by the East Central Wisconsin
Regional Planning Commission ("ECWRPC")**

Dear Mr. Brennan,

Wisconsin Central Ltd ("WCL") takes this opportunity to respond to the ECWRPC's request for release of waybill data. The request seeks samples of railroad traffic "originating, terminating, or passing through Wisconsin". WCL has no objection to releasing only that information.

Such an information release is consistent with the STB's Office of Economics' permission to release waybill data in WB 20-48. In that matter the Office of Economics granted the release of waybill data for traffic originating, terminating, interchanged in, or to pass through California. That decision made it clear that generally only non-revenue information was to be released.

WCL seeks the same treatment with regard to the referenced request herein and requests the Office of Economics only allow non-revenue information to be released in response to the request for data from the waybill sample.

Feel free to contact me if you have questions.

Respectfully submitted,



Michael J. Barron, Jr.
Attorney for Wisconsin Central Ltd.

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cc: All parties of record