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April 19, 2021
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April 19, 2021

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

**Re: STB application of merger rules for handling the proposed merger of the Canadian Pacific and Kansas City Southern.
Finance Docket No. 36500**

Dear Ms. Brown:

On March 25 our company sent a letter of support for the proposed merger of the Canadian Pacific Railway and Kansas City Southern Lines. As a supplier to CPR, and agent for CPR short line Alberta Prairie Railway we see the merger as positive for both U.S. and Canadian agricultural shippers. Accordingly, we support the STB's application of the KCS waiver provision and a timely approval of this transaction, which we believe will be beneficial to our shipping community which also includes growers and transload clients.

CHTRS submits that the expanded single-line route access provided by a CPR-KCS merger supports positive market growth across the United States, Mexico, and Canada, under the USMCA trade agreement.

We also strongly support the quick benefit of improved transit times resulting from the streamlining of interchanges – a benefit in our view to the entire North American railroad industry.

Thank you for the opportunity to provide these comments.

Yours very truly,

CANADIAN HEARTLAND TRAINING RAILWAY SERVICES INC.

A handwritten signature in dark ink, appearing to read 'Kevin Budd', is written over a light blue horizontal line.

Kevin Budd
Managing Director
Kevinbudd@chtrs.ca
1 587 839 9978

CC: All Parties of Record



25 March 2021

ATTENTION:

United States Surface Transportation Board
Washington, D.C.

The Canadian Heartland Training Railway Services (CHTRS) supports the approval of the proposed Canadian Pacific/Kansas City Southern transaction. We believe that this transaction will provide extensive benefits to the overall rail shipping community and we are very excited about the possibilities that the combination of these networks will present upon the STB's approval of the transaction.

CHTRS has been an operating partner of Canadian Pacific for twenty years. We provide rail training service to hundreds of CP's customers to ensure safe industrial operations across Canada. In addition, we manage the CP interline relationship with a short line railway in the province of Alberta, known as the Alberta Prairie Railway ("APR").

Our customers who use our services on the APR include American energy shippers, American agricultural shippers, and a major Canadian agricultural shipper. We know that from discussions with our existing U.S. clients that any opportunity to expand market reach competitively by rail, and specifically through the benefit of a single line haul to access new markets will be extremely welcome. As a short line railway operation that is deeply committed to its community, CHTR and APR together welcome any business development opportunity stemming from an increased expansion of a shipper's reach. With market development and improved service, we believe that the CP/KCS combination will create opportunities for the growth of specifically our transload business – creating new markets for U.S. shippers in western Canada where they currently may have difficulty accessing.

As a company that exists first and foremost to offer the safest rail technical training and related advice possible, we would point out to the STB the excellent safety record in particular of CP. Given the straightforward network connectivity between CP and KCS, and the fact that CP and KCS are the two smallest U.S. Class I railroads, we are confident that they will be able to implement their transaction without the service disruptions that have accompanied some past rail mergers. Given our positive relationship with CP and understanding the CP view on safety – we also believe that they will undertake this combination safely – which is the key ingredient in any successful operation.

**Canadian Heartland Training Railway Services
P.O. Box 3296 Fort Saskatchewan, Alberta Canada T8L 2T3**

Canadian Heartland Training Railway Services is thus voicing strong support for the combination of CP and KCS, because it will enhance competition, provide expanded options, and drive efficiencies for customers of all sizes. We respectfully urge the STB to approve CP's acquisition of KCS as swiftly as possible so that these systems can be integrated, and the end-to-end benefits of this deal can be realized for the benefit of all stakeholders.

Yours very truly,



Kevin Budd

Managing Director, Canadian Heartland Training Railway Services.

VERIFICATION

I Kevin Budd declare under penalty of perjury under the laws of the United States, that the foregoing is true and correct. Further, I certify that I am qualified and authorized to submit this letter.

Executed on 25 March 2021



Kevin Budd