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April 21, 2021

ATTENTION: Surface Transportation Board

RE: STB Finance Docket No. 36500
CP-KCS Potential Combination

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Progressive Rail Incorporated hereby files this letter to express its opposition to the bid by CN to acquire KCS and re-iterate its support for the CP-KCS combination.

As expressed in our initial letter to the Board dated March 29, 2021, Progressive Rail Incorporated supports swift approval of the CP-KCS combination because of the significant benefits the combination would bring, including expanded markets to the North Dakota grain shippers serviced by CP and strengthened competition against the other, larger rail carriers and trucks that serve our members' markets.

Building beyond effectively as possible comment from Progressive Rail's perspective we connect with the Canadian Pacific Railway at multiple station points in Minnesota, Iowa, and, Illinois. The CP / PGR connections are efficient and effective to a point. The reality is a merged Canadian Pacific Railway / Kansas City Southern Railway partnership opens up some significant efficiencies that today simply do not exist with combination A+B and sometimes A+B+C combination rail rates and routes.

However the real competition is our highway carrier rivals and more importantly manufacturing that continues to move offshore. Inefficient rail centric supply chains are in part the reason why rail only has a 9% at best market share for handling merchandise. With a combined CP-KCS a far more competitive option that touches the Atlantic Ocean, Pacific Ocean, and, the Gulf of Mexico will reposition rail as a super efficient mode of transportation that reignites Americas investment in factories, distribution facilities, and raw materials operations right here at home.

Better yet more efficient supply chains are just what our environment urgently needs. Less railroads in the route and shorter routes are good for humanity and every living species on Planet Earth.

In closing, for now Progressive Rail is not supportive of a CN-KCS merger for a myriad of reasons that can be traced back to their disinterest in small to medium sized shippers, re-marketing a wide variety of commodities and merchandise that should and could still be traveling via rail today, plus, the CN's track record of acquisitions that are followed with a dramatic "streamlining" of the acquired property.

Customers of all sizes should have access to high quality rail and the CP-KCS merger would deliver real competition. America needs real rail competition not yet another defensive merger offered by the Canadian National Railway.

In addition, a CPKC network would strengthen competition against other rail carriers and trucks that serve our members' markets. We expect a combined CPKC network to offer seamless, single-line service that will improve our transportation options and provide a better alternative to the options that already exist.

Respectfully submitted,

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CC: All Parties of Record