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ATTENTION: Surface Transportation Board

RE: STB Finance Docket No. 36500

CP-KCS Potential Combination

Ostara Nutrient Recovery Technologies Inc. and Ostara USA LLC 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.

For our perspective, the transaction promises to provide improved service options and invigorate transportation competition in the markets we serve. The combined CPKC network – with new singleline hauls and access to premier ports on the U.S. Gulf, Atlantic and Pacific coasts as well as to key overseas markets – would help us reach our existing markets and new markets more efficiently. And, with the two railroads' strong focus on safety and their track record of operational excellence, I have no doubt that CPKC will be able to integrate their operations seamlessly to the benefit of rail customers and other stakeholders. Ostara has not often spoken favorably about railroad consolidation, but we see this transaction as uniquely beneficial, with none of the downsides that might result from another round of Class I consolidation.

As expressed in our initial letter to the Board dated March 25 2021, Ostara Nutrient Recovery Technologies Inc. and Ostara USA LLC supports swift approval of the CP-KCS combination because of the significant benefits the combination would bring, including expanded markets to shippers serviced by CP and strengthened competition against the other, larger 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. A CN-KCS combination will do nothing to benefit Ostara Nutrient but would instead decrease competition overall.

Respectfully submitted,

Patrick Mitchell

Patrick Mitchell – Director, Supply

Chain April 22, 2021

CC: All Parties of Record