



tel: 306.672.4112
fax: 306.672.4166
toll free: 888.672.4112
Box 719, Gull Lake, SK S0N 1A0

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April 22, 2021

ATTENTION: Surface Transportation Board

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

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Public Record

South West Terminal (SWT) hereby files this letter to express its concerns 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 29th, 2021, we support swift approval of the CP-KCS combination because of the significant benefits the combination would bring, including expanded markets and port options, improved service options, and invigorated transportation competition. SWT is a grain and crop inputs company. As a large single point shipper on CP's main line, it is important for us to have access to all of North America's ports. SWT ships durum wheat to many North American Mills and we look forward to the opportunities that the acquisition will offer into Mexico. As well, we import granular fertilizer from various locations within the United States.

As CP takes on a more integrated approach with acquisitions such as the KCS, we would expect our transit times and service to improve. Even though SWT is located on a CP only served line, CP continues to be a very strategic business partner. The expectation is that the acquisition of KCS will only strengthen our relationship and will improve the already best in class service that CP provides SWT.

By contrast, a CN acquisition of KCS would lead to a reduction in competition and deprive shippers of the many tangible benefits offered by the CP/KCS deal. Specifically, if CN were to acquire KCS, not only will we be deprived of the benefits of the CP/KCS deal, but we will also suffer a reduction of competition in key areas by virtue of CN acquiring KCS.



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From our perspective, the only combination involving KCS that is in the public interest is the one that CP has proposed. Unlike the CP/KCS combination, the acquisition of KCS by CN would result in harm to competition because the two railroads today serve many locations and shippers in common. Indeed, they operate parallel lines between Baton Rouge and New Orleans and Eastern Mississippi; they both serve grain and other shippers in large swaths of the Midwest and Southern United States; and they both reach the port of Mobile, Alabama. Even more fundamentally, between the Upper Midwest and Gulf Coast, a CN/KCS combination would reduce the number of independent routing options from four to three.

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 would limit competitive carrier options to markets and ports south of Kansas City.

Respectfully submitted,

Robert Chapman
Sr. Manager Business Development – SWT
rchapman@swt.ca
(306)774-6804

CC: All Parties of Record