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April 23, 2021

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E. Street, S.W.
Washington, DC 20423-0001

Re: FD 36514, Canadian National Railway Company, Grand Trunk Corporation, and CN's Rail Operating Subsidiaries—Control—Kansas City Southern, the Kansas City Southern Railway Company, Gateway Eastern Railway Company, and the Texas Mexican Railway Company

Dear Ms. Brown:

The Alabama State Port Authority holds statutory authority over the State of Alabama's only seaport – the Port of Mobile. The Port Authority also owns the public seaport terminals, which are accessible to five Class I railroads, including the CN and KCS, three regional railroads, and the Port Authority's owned and operated Terminal Railway (TASD). Midwest and West Gulf shippers rely on both the KCS and the CN to service their freight or container intermodal shipments in and out of the Port of Mobile.

The Alabama State Port Authority supports CN's acquisition of KCS. A CN-KCS railway preserves safe and cost-effective transportation solutions for shippers currently utilizing Mobile's gateway to access Asian, European, and North-South American trade routes. The Port Authority's public seaport investments top \$1.3 billion in both landside and waterside transportation infrastructure, and by 2025, the Port of Mobile will provide ocean carriers 50 ft. navigation depths bringing capacity and economies of scale common to the larger ships positioning into North American service lanes. These investments have provided capacity, attracted new customers, and diversified the port's cargo portfolio. Couple the investments with near balanced trade and reliable and efficient terminals, both shippers and carriers are expanding volume and services at Mobile making it one of the fastest growth ports in North America.

CN's strong track record of success gives us confidence that a combined CN-KCS railroad would be best positioned to serve our current service levels and future growth needs. The combined company creates a network with enhanced end-to-end single-owner, single-operator service resulting in a faster, safer, and more economical rail option for our shippers, while retaining the port's competitive posture in the markets we serve. We are hopeful about this transaction, as a CN-KCS rail transportation solution would not be available through KCS should it move forward with an alternative combination.

For these reasons, the Alabama State Port Authority strongly supports CN's proposed acquisition of KCS, and we hope to see the acquisition successfully completed.

Sincerely,

John C. Driscoll
Director & Chief Executive Officer

C: Parties of Record