

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

ENTERED
Office of Proceedings
May 4, 2021
Part of
Public Record

Re: STB application of rules for handling proposed mergers with the Kansas City Southern railroad

Finance Docket No. 36500

Dear Ms. Brown:

Free and fair competition have long been the strength and cornerstone of U.S. commerce, especially in commodity-based agriculture. As a farmer-owned cooperative, CHS Inc. ("CHS") supports approval of the Canadian Pacific Railway acquisition of Kansas City Southern. Other announced or potential suitors would not today enable much needed north-south service infrastructure.

Corn, soybeans and wheat growers in the Dakotas, Minnesota and Montana depend on north-south shipping lanes, of which there are currently few. Most U.S. rail service runs east-west. Crop producers would benefit from single-line hauls and direct north-south access to ports on the U.S. Center Gulf, Atlantic and Pacific coasts, and southern U.S. export terminals.

U.S. farmers and ranchers' profitability and opportunity should not be limited or defined by region. Every season in agriculture is different, and crop production areas are increasingly changing by weather patterns and changing consumer demand. Corn acres are shifting north. Sunflower acres are shifting west. Highly valued durum wheat acres are shifting north into Canada.

Farmers need more and better rail transportation service in northern geographies, not fewer. Expansion that creates competitive rail lines could deliver incremental market access to America's rural communities.

Respectfully,



John Griffith

CHS Executive Vice President, Global Grain & Processing and CHS Hedging

cc: all parties of record