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December 11, 2023

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

Re. Docket No. 36744- Canadian National Railway and Grand Trunk Corporation- Control- Iowa Northern Railway Company.

Motion/Petition/Request

Dear Ms. Brown:

On 12/6/23 the Canadian National Railway (CN) announced it intent to acquire Iowa Northern Railway.

The reason for this letter is to request that this proposed merger be denied on the basis of agricultural market structure and questions of foreign investment.

Described as a Montreal, Canada based powerhouse CN has apparently stated this this proposed merger will create a *"single-line service to North American destinations."* And, *"financial terms were not disclosed."* I'm questioning the overall market impact of this proposed merger, including foreign investments and what exactly, does *"single-line service to North America"* actually mean?

The attached from the US-China Business Council shows the exports from the state of Iowa to it's two largest markets which are Canada and China. I don't think it's anything of a reaching conclusion to see why a Canadian based rail carrier would be interested in acquiring rail assets in an export region in the United States. Some further exhibits show the largest exports to China in terms of agricultural markets.

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My concern is about foreign control and financial investments into strategic infrastructure in the United States including railroads and agriculture. Foreign companies have already purchased rail carriers Kansas City Southern, Florida East Coast and the Central Maine & Quebec.

I'm questioning where all of this is leading.

Sincerely,

Steven Connolly

Steven Connolly

Attachments

cc. Parties of Record.

Iowa

Growth in Iowa Exports

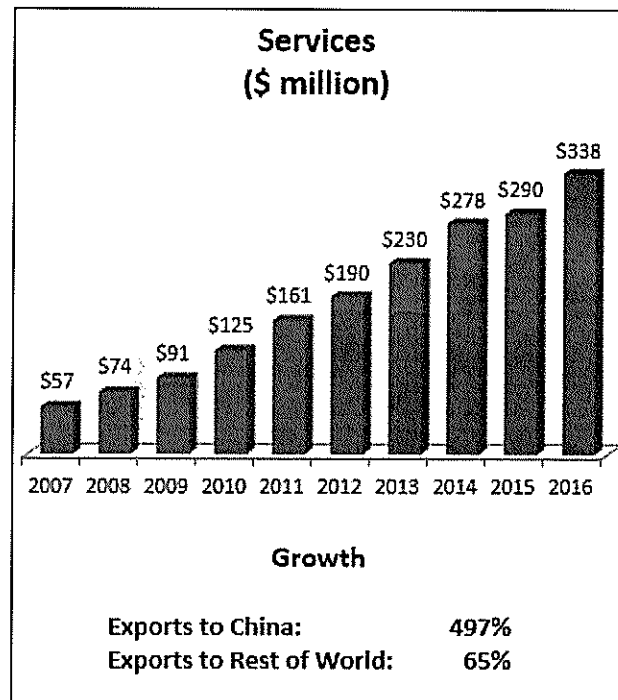
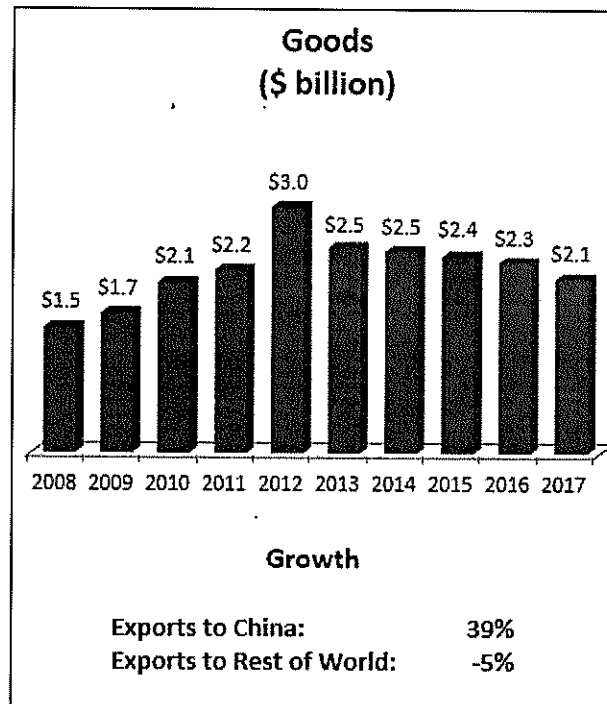
Iowa's exports to China supported 23,600 American jobs in 2016.

Growth in Goods Exports to China, 2008 – 2017: 39%

Growth in Goods Exports to Rest of World, 2008 – 2017: -5%

Growth in Services Exports to China, 2007 – 2016: 497%

Growth in Services Exports to Rest of World, 2007 – 2016: 65%



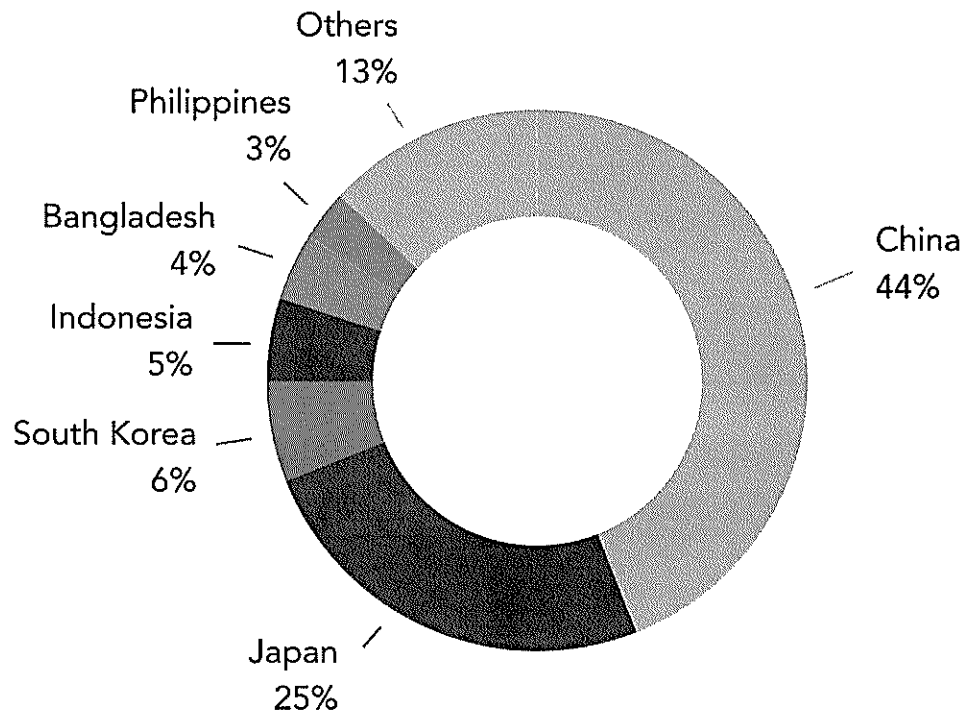
Iowa: Top Goods Export Markets, 2017

1. Canada	\$4.1 billion
2. China	\$2.1 billion
3. Mexico	\$2.0 billion
4. Japan	\$1.3 billion
5. Korea	\$450 million



Source: Trade Data Online, Statistics Canada

Figure 2: Top Destinations for Canadian Agriculture and Agri-Food in the Asia Pacific, in 2022



Tools that map trade potential show that Canadian agriculture exports have historically underperformed in major Asia Pacific markets, especially in Southeast and South Asia – the two sub-regions where food insecurity is especially acute. The export-potential tool [2], developed by the International Trade Centre (ITC), a multilateral organization specializing in trade, reveals that Canadian fertilizers, pulses, and preserved and processed food products have the most export potential in the Asia Pacific, among other products (Figure 3). Clearly identifying the region's agriculture needs and juxtaposing them against Canada's available products is an important step to better understanding the unmet potential and boosting agricultural trade with the region.

The top five imports to China in 2020 were soybeans, frozen pork, frozen beef, baby food and palm oil. In 2020, Canada had an agri-food and seafood trade surplus of Can\$4.9 billion with China. Canada's agri-food and seafood exports to China were valued at Can\$9.4 billion in 2020, an increase of 43.3% from 2019.

Mar 2, 2022