

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

308017

DOCKET NO. FD 36744

ENTERED
Office of Proceedings
February 27, 2024
Part of
Public Record

**CANADIAN NATIONAL RAILWAY COMPANY
AND GRAND TRUNK CORPORATION
—CONTROL—
IOWA NORTHERN RAILWAY COMPANY**

COMMENT OF THE NATIONAL GRAIN AND FEED ASSOCIATION

The National Grain and Feed Association (“NGFA”) hereby submits this brief initial comment on the Application filed in this proceeding by Canadian National Railway Company and Grand Trunk Corporation.¹ A threshold issue for the Surface Transportation Board (“Board”) to consider is whether to classify the proposed transaction as “minor” or “significant.” The former designation entails a shorter procedural schedule and less evidentiary analysis of the transaction than the latter. The NGFA’s general position on railroad transactions under 49 U.S.C. §§11324-11325 in today’s consolidated railroad industry has been that the Board should err on the side of closely scrutinizing any such transaction for its potential impacts on competition, service, and agricultural markets. For this reason, while the NGFA takes no position on the merits of the proposed transaction at this time, it nevertheless requests that the Board err on the side of

¹ The NGFA intends to participate as a party of record in this proceeding if the Board accepts the Application and establishes a procedural schedule.

categorizing the proposed transaction as “significant” and implement a procedural schedule consistent with the requirements for such transactions set forth in 49 C.F.R. Part 1180.

Respectfully submitted,

A handwritten signature in blue ink that reads "Thomas W. Wilcox". The signature is written in a cursive style with a small dot above the 'i' in "Wilcox".

Thomas W. Wilcox

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February 27, 2024

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of February, 2024, I served a copy of the foregoing Comment of the National Grain and Feed Association by electronic mail upon all parties of record on the official service list for Docket No. EP 36744 .

/s/ Thomas W. Wilcox
