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March 4, 2024

By E-Filing

Ms. Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

RE: STB Docket No. FD 36744, *Canadian National Railway Company
and Grand Trunk Corporation – Control – Iowa Northern Railway
Company*

Dear Ms. Brown:

The National Grain and Feed Association (“NGFA”) hereby submits this brief response to the Petition for Reconsideration filed by the Canadian Pacific Kansas City (“CPKC”) of the Board’s February 29, 2024 decision in this proceeding accepting the Application filed by the Canadian National Railway Company and Grand Trunk Corporation (“Applicants”). In Section II of its petition CPKC states that its Comment asking the Board to categorize the transaction as “Significant” was “supported by NGFA.” CPKC’s Comment at 4-5. Respectfully, the NGFA’s filing speaks for itself, and the NGFA did not state or imply its filing was made in support of the evidence and argument submitted by CPKC.

The NGFA only expressed its general view that in today’s consolidated railroad industry the Board should closely scrutinize all proposed transactions for their adverse effect on competition, service, and agricultural markets and it requested the Board to err on the side of categorizing the proposed transaction as “Significant.”

Law Office of Thomas W. Wilcox, LLC

Letter to Cynthia Brown

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Respectfully submitted,

A handwritten signature in blue ink that reads "Thomas W. Wilcox". The signature is written in a cursive, flowing style.

Thomas W. Wilcox

*Counsel for the National Grain and Feed
Association*

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 2024, I served a copy of the foregoing document by electronic mail upon all parties of record on the official service list for Docket No. FD 36744

/ss/ Thomas W. Wilcox
