

RAIL REGULATORY LAW
LAW OFFICE OF KEVIN M SHEYS



42 BRUSH HILL ROAD
SHERBORN, MASSACHUSETTS
01770

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August 14, 2024

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August 14, 2024
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Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W., Room 1034
Washington, DC 20423-0001

**Re: Waterloo Railroad, LLC – Change of Operator
Exemption with Interchange Commitment –
Union Pacific Railroad Company, FD 36798**

Dear Ms. Brown:

On August 12, Waterloo Railroad, LLC (“WTRL”) filed a letter asserting that the Petition for Exemption filed on August 7 in AB 284 (Sub-No. 5X) by Iowa Northern Railway Company (“IANR”) “clearly indicates that IANR consents to discontinuance of their operations over the Waterloo Industrial Lead.” WTRL August 12 Letter at 1.

IANR explained in letters filed in this docket on July 26 and July 31 that it does not consent to the change of operator exemption sought by WTRL. Consistently, IANR’s Petition for Exemption explains again why it does not consent to the WTRL change of operator exemption and notes that granting the Petition for Exemption “would provide IANR with authority to discontinue its operations promptly *after* . . . WTRL and IANR have completed all steps necessary for a smooth transition of operations.” IANR Petition for Exemption at 6 (emphasis added); *see also id.* at 4 (“IANR will not consummate the discontinuance authority granted by the Board *until* . . . all steps for a smooth transition of operations have been accomplished.”) (emphasis added).

IANR does not consent to the change of operator exemption and the Petition clearly explains precisely how IANR will proceed once it has STB discontinuance authority.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Sheys', with a stylized, flowing script.

KEVIN M. SHEYS
KSHEYS@RAILREGLAW.COM
240-463-4663
WWW.RAILREGLAW.COM

cc:

wmullins@mullinslawgroup.net
tspratt@up.com