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Office of Proceedings
May 30, 2025
Part of Public Record

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May 30, 2025

Scott M. Zimmerman
Acting Director, Office of Proceedings
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re. Docket No. 36744 (Sub-No. 3) *Canadian National Railway Company and Grand Trunk Corporation-Control-Iowa Northern Railway Company.*

Interchange Data Submission.

Protest/Opposition Statement.

Dear Mr. Zimmerman:

On or about April 30, 2025 the Sidley Austin, LLP law firm submitted a required interchange data submission for the above stated finance docket.

I request to protest/oppose this submission for information and data that I believe is vague and lacking in detail and does not support the interests of transportation, commerce and the long-term direction and impact(s) caused by this finance docket.

In the interests of time I'll move right to specific example(s). "*Highly Confidential*" is defined however, the remaining material, or lack thereof does not give any breakdown, comparative analysis or even a direction of interchange traffic and whether these traffic levels including the underlying service metrics are improving or declining or staying the same. There is no information about capital improvement(s) if in fact this is even happening.

More specific examples on one of the unmarked pages the agency header lists 10-15 STB with Intermodal Public receiving a fact value of zero. There are several annual and quarterly listings of this intermodal being zero. It's my understanding there is no intermodal traffic on this IANR and there hasn't been. None.

Scott M. Zimmerman, Acting Director. (Cont'd)

So why would intermodal statistics be listed numerous times if there isn't, and hasn't been any type of this traffic. I thought the purpose of this reporting is an analysis of traffic that actually exists in reality.

Some further examples 1 STB states in a quarterly heading 2847 cars. There is no historical breakdown as to whether this represents an increase/decrease or staying the same. There is no indication on these sheets any type of market direction and/or capital improvement. I would find it difficult on 7 STB that in Quarter 1 of 2025 that there were no cars handled N/A.

There can be no argument that any business needs to maintain and secure confidential records such as customer base, strategy and related cash flow. But I'm looking at these provided sheets and question if they even really mean anything?

I've contacted the Canadian National Railway at their Corporate Headquarters in Montreal, Canada at least three (3) seeking information, clarification, strategy and direction on the acquisition of the Iowa Northern Railway.

All of my requests are ignored.

Sincerely,

/S/ **Steven Connolly**

Certification:

cc. Parties of Record.

Senator Ashley Moody.

