

310492

December 10, 2025

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

ENTERED
Office of Chief Counsel
December 10, 2025
Part of
Public Record

Re: FD 36447, Lake Providence Port Commission – Feeder Line Application – Line of Delta
Southern Railroad Located in East Carroll and Madison Parishes, LA

Dear Sir or Madam:

I represent Terral RiverService, Inc. For the reasons stated in my letter to counsel for Delta Southern Railroad, I write to notify the Board of my appearance on behalf of Terral RiverService, Inc. in the above-referenced proceeding and to advise that Terral has completed and served its responses to the interrogatories propounded by Delta Southern Railroad, Inc.

An electronic copy of Terral RiverService, Inc.'s responses was provided to all parties of record and is also enclosed for the Board's convenience. Terral's responses have been provided subject to and without waiver of any rights, privileges, or protections, and all prior objections are preserved.

Please let me know if any additional information would be helpful.

Respectfully submitted,



Ernesto André Silva Cruz, Esq., LL.M.
In-House Legal Counsel for Terral RiverService, Inc.
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Enclosure: Terral RiverService, Inc.'s Responses to Interrogatories Propounded by Delta Southern Railroad, Inc.

December 8, 2025

Re: Finance Docket No. 36447 — Lake Providence Port Commission—Feeder Line
Application—Line of Delta Southern Railroad Located in East Carroll and Madison Parishes,
Louisiana

Counsel:

I represent Terral RiverService, Inc. in connection with the above-referenced proceeding.

Terral appeared in FD 36447 solely by verified statement as a non-party shipper witness. Under the Board's rules, written discovery is directed to parties. Because Terral is not a party to this proceeding, Terral is not obligated to respond to the interrogatories, requests for production, or requests for admission that were transmitted to Mr. Martin.

To avoid any misunderstanding on the factual record, Terral clarifies that it has not pursued rail service over the subject line during the relevant period because, as set out in Mr. Martin's verified statement, the condition and use of the line did not permit reliable or safe service for Terral's intended movements. That includes extended use of the line for car storage that impeded access and track conditions that were not suitable for the equipment at issue. Terral's position on this point is unchanged.

Terral reserves all rights, privileges, and protections, including with respect to any pending filings before the Board concerning scheduling and discovery. We remain available to meet and confer regarding appropriate next steps consistent with the Board's rules and any procedural schedule the Board may issue.

Sincerely,



Ernesto André Silva Cruz, Esq., LL.M.
In-House Legal Counsel
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