

ENTERED
Office of Chief Counsel
January 15, 2026
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*Surface Transportation Board
Washington, D.C. 20423-0001
Office of Economics*

January 7, 2026

Re: Waybill Request WB25-53

I have approved the addition of the following individual to the waybill access letter in WB25-53.

a) Andrew Gerlach – Sullivan & Cromwell LLP

Prior payment of processing and mailing cost of **\$72** (\$72 per signature) is required and received.

Sincerely,

FRANCIS
O'CONNOR

Digitally signed by
FRANCIS O'CONNOR
Date: 2026.01.07
07:41:25 -05'00'

Francis X. O'Connor
Acting Director
Office of Economics

Waybill Agreement WB25-53

I have read and understand the conditions for release of the CCWS data. I agree to comply fully with these conditions and the provisions of this confidentiality agreement. No later than thirty days before the agreement expires, I will request an extension of this agreement, if necessary. If no extension is requested, I will return or destroy all CCWS data and certify that I have done so. I have the authority to sign this agreement.

By: Andrew Gerlach

Signed by:

F1829565B1F14AB...
Signature

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-202-956-7500
FACSIMILE: 1-202-956-7676
WWW.SULLCROM.COM

*1700 New York Avenue, N.W.
Suite 700
Washington, D.C. 20006-5215*

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January 6, 2026

Via E-mail

Dr. Francis O'Connor
Acting Director, Office of Economics
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423-0001
[Email: francis.o'connor@stb.gov]

Re: Waybill Request WB25-53, Finance Docket No. 36873

Dear Dr. O'Connor:

I am writing regarding the grant of waybill access to outside counsel and consultants working on behalf of CPKC in Finance Docket No. 36873. *See* WB25-53 (letter of September 4, 2025). CPKC wishes to provide access to an additional attorney at Sullivan and Cromwell LLP. The purpose of access by outside counsel remains the same as that set forth in David Meyer's August 26, 2025 letter.

Specifically, pursuant to 49 C.F.R. § 1244.9(b)(4), CPKC requests that the following outside counsel (who is not currently an employee of CPKC) be authorized to obtain and use the waybill data previously provided pursuant to WB25-53:

1. Selected attorney of Sullivan & Cromwell LLP:
 - (a.) C. Andrew Gerlach

Payment of \$72.00 for this individual has been submitted to the STB's electronic payment system at pay.gov, reflecting the \$72 per person fee (the \$200 fixed fee was already paid as part of Waybill Request WB-25-53. *See* 49 C.F.R. § 1002.2(f)(98)(i)).

Pay.gov Tracking ID: 27UGK543

Agency Tracking ID: 77259754262

Dr. Francis O'Connor

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Please do not hesitate to contact me at (202) 956-7610 if you have any questions regarding this request.

Sincerely,

Joseph J. Matelis

*Attorney for Canadian
Pacific Railway Limited*

cc: Nizam Hasham