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Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

**Re: Koch Industries, Inc.—Continuance in Control Exemption—Moscow
Camden and San Augustine Railroad LLC, STB Finance Docket No. 34991**

Dear Ms. Brown:

This letter will advise the Surface Transportation Board of a change in the direct ownership of Moscow Camden and San Augustine Railroad LLC (“MCSA”), a Class III rail carrier, as a result of an intra-corporate transaction. We begin by providing the relevant history of STB proceedings related to MCSA.

In STB Finance Docket No. 34990, MCSA filed a notice of exemption to acquire and operate a rail line that was owned and operated by Moscow, Camden & San Augustine Railroad. *See Moscow Camden and San Augustine Railroad LLC—Acquisition and Operation Exemption—Assets of Moscow, Camden & San Augustine Railroad*, STB Finance Docket No. 34990 (STB served Feb. 16, 2007). Concurrent with that notice, the ultimate owner of MCSA, Koch Industries, Inc. (“Koch”), a non-carrier, filed a notice of exemption in STB Finance Docket No. 34991 to continue in control of MCSA upon MCSA becoming a Class III rail carrier. *See Koch Industries, Inc.—Continuance in Control Exemption—Moscow Camden and San Augustine Railroad LLC*, STB Finance Docket No. 34991 (STB served Feb. 16, 2017). In that notice, Koch Industries, Inc., which also holds STB authorization to control two other railroads, explained that Georgia-Pacific Wood Products South LLC, a non-carrier indirect subsidiary of Koch, would become the direct owner of MCSA and that Koch would be the ultimate indirect owner of MCSA through Georgia-Pacific Wood Products South LLC and various other intermediate owners. These notices became effective in 2007.

On December 31, 2017, Georgia-Pacific Wood Products South LLC merged with and into non-carrier Georgia-Pacific Wood Products LLC, another indirectly owned non-carrier subsidiary of Koch, with Georgia-Pacific Wood Products LLC being the surviving entity. As a result of this intra-corporate transaction, Georgia-Pacific Wood Products South LLC no longer

exists and Georgia-Pacific Wood Products LLC, which neither owns nor controls any other railroad, has become the direct owner of MCSA. Koch remains the ultimate parent of MCSA.¹

If you have any questions regarding this transaction, please do not hesitate to contact us at the phone number or email address provided above.

Respectfully,



David H. Coburn
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Attorneys for Koch Industries, Inc. and
Moscow Camden and St. Augustine
Railroad LLC

¹ Koch also remains the ultimate parent of three other railroads, Old Augusta Railroad, LLC; Blue Rapids Railway Company, LLC; and KM Railways, LLC. Koch's control of these railroads has previously been approved by the STB. See *Koch Industries, Inc.—Continuance in Control Exemption—KM Railways, LLC*, STB Finance Docket No. 35320 (STB served Dec. 4, 2009).