

FLETCHER & SIPPEL LLC

ATTORNEYS AT LAW

29 North Wacker Drive
Suite 920
Chicago, Illinois 60606-2832

Phone: (312) 252-1500

Fax: (312) 252-2400

www.fletcher-sippel.com

244622

ROBERT A. WIMBISH

(312) 252-1504

rwimbish@fletcher-sippel.com

October 27, 2017

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VIA ELECTRONIC FILING

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W., Room 1034
Washington, DC 20024

**Re: Docket No. AB-303 (Sub-No. 49X)
Wisconsin Central Ltd. - Discontinuance of Service Exemption –
In Oneida and Marinette Counties, Wisconsin**

Dear Ms. Brown:

I am writing on behalf of Wisconsin Central Ltd. ("WCL") to – (1) report an inadvertent scrivener's error in WCL's Discontinuance of Service Notice of Exemption (the "Exemption Notice") filed with the Surface Transportation Board ("Board") in the above-referenced docket on September 26, 2017; and (2) respond to a recent petition tendered by the Northwoods Rail Transit Commission and the Wisconsin Central Group ("Northwoods").

Regarding the scrivener's error, although properly captioned throughout, the Exemption Notice narrative incorrectly refers to "Waupaca County," where it should say "Oneida County" instead. None of the subject railroad line is located in Waupaca County – it is located in Oneida and Marinette Counties. This same incorrect reference to Waupaca County appears in the body of the Board-issued notice of October 16, 2017, although, there, too, the proceeding caption is correct. Inadvertent reference to Waupaca County in the Exemption Notice and its supporting materials was limited. The map is accurate, and the required advance notices and the Verification of Mr. Brian Buchanan correctly reference Oneida County, not Waupaca County; the USPS ZIP Codes are also correct.

WCL acknowledges that the Board may consider it necessary or appropriate to issue a corrected notice or decision to reflect the right counties.

Regarding the Northwoods petition, WCL understands that this 10-page filing, in the end, merely seeks an assurance that, in invoking the discontinuance of service class exemption procedures as it has, WCL is not authorized to salvage the track along the subject line. As WCL recently advised Northwoods' counsel directly, WCL's intentional use of the class

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exemption to discontinue its common carrier service obligation – rather than to abandon the line – speaks for itself, as does the absence here of an environmental and historic report. The content of the Exemption Notice filing and agency discontinuance precedent should be clarification enough. There is no need for any “reconsideration” of the Board’s processing of the Exemption Notice, and clarification of the scope of WCL’s discontinuance authority is unnecessary.

Thank you for your attention to this matter. Please let me know if you have any questions concerning the subject caption correction.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "R. A. Wimbish". The signature is fluid and cursive, with a large, sweeping "W" and a long, horizontal stroke at the end.

Robert A. Wimbish
Attorney for Wisconsin Central Ltd.

RAW/ekf

cc: All parties of record