



Canadian/American Border Trade Alliance

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James D. Phillips
President & CEO

October 13, 2019

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

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Re: *Bessemer & Lake Erie R.R.—Acquisition & Operation—Certain Rail Lines of CSX Transportation, Inc. in Onondaga, Oswego, Jefferson, Saint Lawrence, and Franklin Counties, New York (STB Docket No. FD 36347)*

Ms. Cynthia T Brown,

Can/Am BTA, headquartered in upstate New York, has taken an active interest on legislative, procedural and regulatory issues affecting border entry procedures, transportation and trade between the U.S. and Canada, the two largest trading partners on the world. Can/Am BTA is a transcontinental / bi-national broad based organization with participation from all 27 states on or near the U.S./Canada Border (Washington to Maine including Alaska) and the Canadian Provinces with a combined network which involves over 60,000 companies and organizations in their individual memberships. Can/Am BTA participants include members from border trade, border crossing and transportation segments – producers, shippers, brokers, import/exporters, transportation providers, bridge and tunnel operators, chambers of commerce, business and trade corridor associations, economic development and gov't agencies.

We are fully in support of the Bessemer and Lake Erie Railroad Company's ("B&LE") request to the Surface Transportation Board for authority to acquire and to operate the portion of the Massena Lines in the United States.

1. Stakeholder's Interest in Proceeding

- Efficient rail transportation is essential to the local businesses serving New York and particularly the Massena Region and its important connections to Canada.
- Local businesses rely on local rail service on the Massena Lines as well as CN/CSX Transportation, Inc. ("CSX") interline service over those lines to bring in supplies used by their businesses and to ship their products to markets.

2. Reasons for support

- B&LE's proposed acquisition of the U.S. Massena Lines raises no competitive issues. The transaction will preserve the competitiveness of the Massena Lines route. This helps local customers who depend on that route for rail service.



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- With B&LE's acquisition of the U.S. Massena Lines, CN and CSX will be able to maintain an efficient direct interchange for traffic moving over the Massena Lines route.
- The transaction involves an end-to-end acquisition and will move the location of the CN/CSX interchange from Quebec to near Syracuse.
- [Stakeholder] expects the acquisition and integration of the U.S. Massena Lines into CN's system to proceed smoothly due to its end-to-end nature.
- CN is a Class Act and their ownership and management will provide opportunities and growth that enhances job creation in those it serves.

3. Conclusion

Can/Am BTA believes that the proposed acquisition will benefit businesses by preserving local rail service on the Massena lines and the efficient current gateway and interchange over the Massena Lines. We respectfully urge that the Board approve B&LE's acquisition at its earliest opportunity.

Sincerely,

James. D. Phillips

Original Signed

President and CEO

Cc: Parties of Record