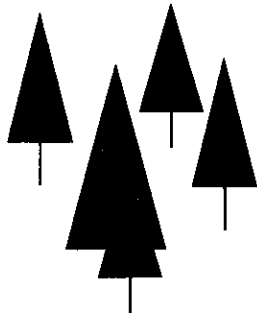


197225

Tel: (506) 634-4242
 Fax: (506) 634-4244
 Fax: (506) 634-4245

IRVING



Forest Services Limited

P.O. Box 5666, 300 Union Street
 Saint John, N.B., Canada E2L 5B6

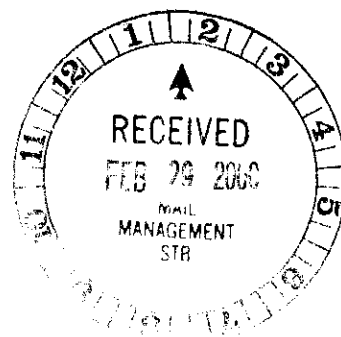
February 25, 2000

Mr. Vernon A. Williams, Secretary
 Surface Transportation Board
 Office of the Secretary
 Case Control Unit
 Attn: STB Ex Parte No. 582
 1925 K Street, N.W.
 Washington, DC 20423-0001

ENTERED
 Office of the Secretary

FEB 29 2000

**Part of
 Public Record**



Dear Sir:

Irving Paper and Irving Pulp & Paper are companies in the forest products industry and are major users of rail service in the U.S. and Canada. The purpose of this letter is to comment on the issues to be discussed on March 8, 2000 in Ex Parte 582.

We encourage the Surface Transportation Board to focus on whether the proposed CN-BNSF combination is good for shippers and its customers. The CN-BNSF combination should be judged on its merits and if other carriers propose mergers, then these cases ought to be evaluated on their merits at that time.

The timing of the proposed CN-BNSF combination is not the central issue for our company. Our concern is service. Recent mergers have failed on service. Accordingly, the Surface Transportation Board should focus on ensuring that CN-BNSF combination and any other future mergers, will deliver service to the shippers and to their customers.

At this point, we have not taken a decision on whether to support the CN-BNSF combination but will do so at the appropriately scheduled STB Hearing on CN-BNSF's application.

The Surface Transportation Board has a comprehensive process to evaluate railroad transactions and protect the public interest. It should fairly evaluate the CN-BNSF combination according to that process.

Sincerely,

Lawrence V. Mackisoc
 Manager Logistic Services
 & Customer Service



AN IRVING FOREST PRODUCTS COMPANY