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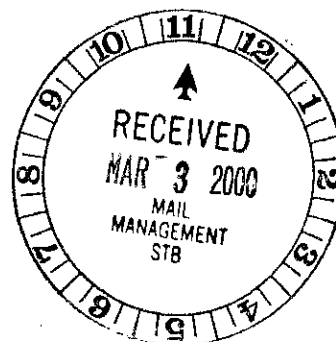
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March 2nd, 2000

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Office of the Secretary

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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, D.C. 20423-0001

Dear Sir,

Rogers Sugar Ltd. is a Canadian company that is a major user of rail services. The purpose of this letter is to comment on the issues to be discussed on March 8th, 2000 in Ex Parte 582.

We encourage the Surface Transportation Board to focus on whether the proposed CN-BNSF combination is good for shippers, not on potential downstream effects on the industry. The CN-BNSF combination should be judged on its merits and if other carriers propose mergers, then those cases ought to be evaluated on their merits.

The idea of the proposed CN-BNSF combination is not the central issue for our company. Our concern is service and efficient operations. Recent mergers have failed on service, while not improving price efficiencies dramatically. Accordingly, the Surface Transportation Board should focus on ensuring that the CN-BNSF combination, and any other future mergers, will deliver service at a competitive price.

The Surface Transportation Board Review is a comprehensive process to evaluate railroad transactions and protect the public interest. It should evaluate the CN-BNSF combination according to that process. Do not let other railroads use the Surface Transportation Board process to protect them from a competitively priced transportation service alternative.

Sincerely,

Jim Mantle
Logistics Co-ordinator
JM/lt.