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CH Robinson - Rail Division
February 28, 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, D.C. 20423-0001

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Office of the Secretary

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Dear Sir:

I am writing this letter in conjunction with the upcoming hearings on March 8, 2000 in Ex Parte 582 concerning the merger proposal between the CN RR and the BNSF RR.

CH Robinson is one of the largest third-party providers of intermodal services in North America. As such, we do business with all of the major rail carriers in North America including the two currently being addressed. With the recent history that we have experienced with rail mergers in North America, we have a mixed review of the results. We are concerned with the timing of this proposal, due to the anticipated reaction by the other carriers of a defensive nature. We are very concerned about their ability to succeed with any additional mergers at this time, as well as the ability of the CN and BNSF having both recently gone through their own mergers.

Notwithstanding, we also see the potential merits of the application at hand, as well as some of the pitfalls. We feel that too little is known at this time about the full management and operating plan of the parties to make a full assessment of the benefits of the merger. The only way to gain that knowledge is to learn how the parties will manage and operate the combined companies moving forward, and what kinds of implications that will have on serving our transportation needs.

We feel that the Surface Transportation Board has a comprehensive process to evaluate this as well as other applications, and trust in the Board to do so. The needs of the shipping community should be at the heart of the discussions, and insuring the best transportation service possible should be the targeted result of these discussions.

Sincerely,

David L. Howland
Vice President & General Manager

Cc: Tom Sandstrom - CH Robinson - Sr. Attorney