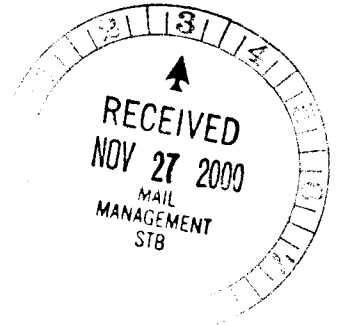


BEFORE THE
SURFACE TRANSPORTATION BOARD

EX PARTE NO. 584

200633

WISCONSIN CENTRAL LTD.
-- PETITION FOR RULEMAKING --
CLASSIFICATION OF CARRIERS



EX PARTE NO. 634

200632

CONSOLIDATED RAILROAD REPORTING

PETITION TO CONSOLIDATE PROCEEDINGS

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**ATTORNEYS FOR WISCONSIN CENTRAL
TRANSPORTATION CORPORATION**

Dated: November 24, 2000

BEFORE THE
SURFACE TRANSPORTATION BOARD

EX PARTE NO. 584

WISCONSIN CENTRAL LTD.
-- PETITION FOR RULEMAKING --
CLASSIFICATION OF CARRIERS

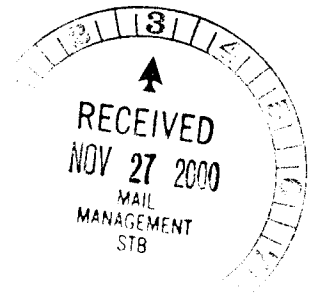
EX PARTE NO. 634

CONSOLIDATED RAILROAD REPORTING

PETITION TO CONSOLIDATE PROCEEDINGS

Wisconsin Central Transportation Corporation ("WCTC") hereby files this petition pursuant to 49 C.F.R. § 1117 to consolidate the Board's consideration and determination of two pending rulemaking proceedings addressing the proper treatment of rail carriers for regulatory classification and reporting purposes. Particularly with respect to WCTC's rail carrier subsidiaries, the pending matters involve significant overlapping issues regarding the character of Class I and Class II railroads and what the dividing line between those classifications should be. Those issues should be discussed and resolved on their merits, in a forthright, transparent and comprehensive manner and with the benefit of all relevant information and participation by all interested parties. Proceeding with two separate rulemakings could obscure certain underlying questions and considerations, diminish the Board's effective consideration of the relevant issues, and lead to inconsistent, incomplete or at least inadequate decisions.

On November 15, 2000, Wisconsin Central Ltd. ("WCL"), a Class II rail carrier and a WCTC subsidiary, filed in Ex Parte No. 584 a petition to amend 49 C.F.R. § 1201, 1-1(a) and revise the current revenue threshold for Class I rail carriers from \$250 million (in 1991



dollars) to \$500 million (in 2000 dollars). As is explained more fully in WCL's petition, there have been significant changes in the structure and concentration of the U.S. railroad industry since the last time the Board's predecessor considered and revised the Class I revenue threshold. While WCL's operating revenues are approaching the existing Class I threshold, the fundamental character of WCL as a regional railroad distinct in both qualitative and quantitative ways from the nation's megacarriers has not changed. WCL's petition seeks to assure that the Board's rail classification system continues to reflect accurately the regulatory policies and needs of the Interstate Commerce Act.

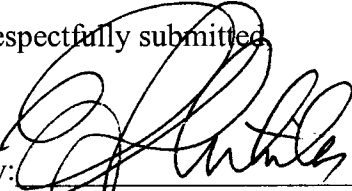
WCTC has today filed in Ex Parte No. 634 its comments on the Board's proposal to adopt Financial Accounting Standards Board Statement No. 94 ("FASB 94") and require consolidated regulatory reporting by rail carriers. As WCTC explains in its comments, the Board proposal addresses no real existing or potential needs, will result in significant confusion and harm to rail carriers, and suffers from procedural and jurisdictional deficiencies. WCTC believes that the proposal in Ex Parte No. 634 should be rejected on its merits. If the Board nonetheless proceeds with consideration of the FASB 94 proposal, however, that could result in the creation of new Class I rail systems, and appears in some respects to be intended to reach just such a result. Whether such an outcome is consistent with the public interest and the Interstate Commerce Act will turn on the same issues, evidence and arguments that will be considered in Ex Parte No. 584.

In such circumstances, both rational decision-making and administrative economy will be furthered by a single, comprehensive review of the common Class I classification issues underlying both Ex Parte No. 584 and Ex Parte No. 634. If the Board does not decline to adopt

its FASB 94 proposal for the reasons provided by WCTC and other parties, it should consolidate that matter with Ex Parte No. 584 for consideration and disposition.

WHEREFORE, WCTC respectfully requests that the pending proceedings before the Board in Ex Parte No. 584 and Ex Parte No. 634 be consolidated.

Respectfully submitted,

By: 

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**ATTORNEYS FOR WISCONSIN CENTRAL
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Dated: November 24, 2000

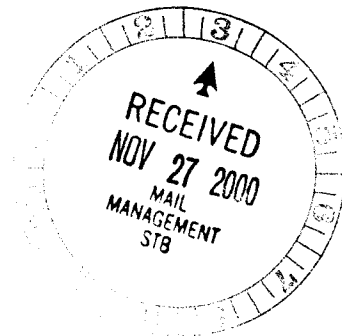
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November 24, 2000



VIA FEDERAL EXPRESS

Mr. Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W., Room 700
Washington, DC 20006

Re: **Ex Parte No. 584**
Wisconsin Central Ltd. -- Petition for
Rulemaking -- Classification of Carriers

Ex Parte No. 634
Consolidated Railroad Reporting

Dear Secretary Williams:

Enclosed for filing in the above-captioned proceedings are an original and ten copies of a **Petition to Consolidate Proceedings**, dated November 24, 2000.

One extra copy of this transmittal letter and of the Petition are included as well. I would request that you date-stamp those copies to show receipt of this filing and return them to me in the provided envelope.

If you have any questions regarding this filing, please feel free to contact me. Thank you for your assistance on this matter. Kind regards.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "T. Litwiler", written over the typed name.

Thomas J. Litwiler
Attorney for Wisconsin Central
Transportation Corporation

TJL:tl

Enclosures