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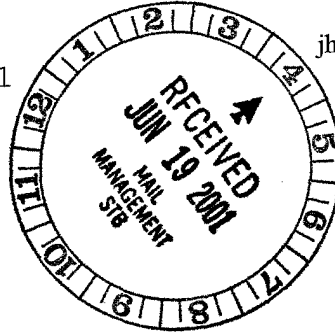
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June 19, 2001

VIA HAND DELIVERY

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
Case Control Unit
1925 K Street, N.W.
Washington, D.C. 20423-0001



Re: Finance Docket No. 34000, Canadian National
Railway Company, et al. -- Control -- Wisconsin
Central Transportation Corporation, et al.

Dear Secretary Williams:

Enclosed for filing in the above-referenced proceeding please find an original and twenty-five (25) copies of AK Steel Corporation's Reply to Great Lakes Transportation LLC's Motion to Compel Discovery **(AKS-6)**.

We have enclosed an electronic copy of this Reply on a computer diskette, and have enclosed an additional hard copy of this Reply to be date-stamped and returned to the bearer of this letter.

Thank you for your assistance in this matter.

ENTERED
Office of the Secretary

JUN 20 2001

Part of
Public Record

Sincerely,

John H. LeSeur
An Attorney for AK Steel
Corporation

Enclosures

cc: Carolyn F. Corwin, Esq.
Paul A. Cunningham, Esq.
Parties of Record

BEFORE THE
SURFACE TRANSPORTATION BOARD

Canadian National Railway Company,	)
Grand Trunk Corporation, and WC	)
Merger Sub, Inc. -- Control and	)
Merger -- Wisconsin Central	)
Transportation Corporation,	)
Wisconsin Central Ltd.,	)
Fox Valley & Western Ltd.,	)
Sault Ste. Marie Bridge Company,	)
and Wisconsin Chicago Link Ltd.	)

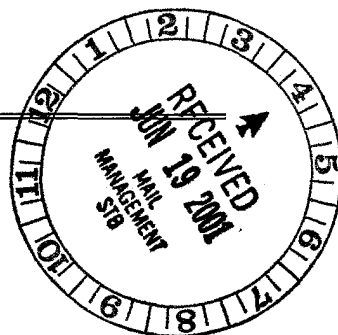
Finance Docket No. 34000

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**AK STEEL CORPORATION'S REPLY TO
GREAT LAKES TRANSPORTATION LLC'S
MOTION TO COMPEL DISCOVERY**



AK urges the STB to summarily deny Great Lakes' motion to compel. This motion -- filed yesterday -- seeks information that has no relevance in this proceeding. It also appears to have been filed solely to harass AK.

AK intervened in this proceeding after Great Lakes took the position that the proposed merger of CN and WC would force Great Lakes to abandon service to AK's Butler, Pennsylvania facilities.¹ AK filed discovery on Great Lakes concerning these representations and, rather than provide the requested discovery, Great Lakes shifted gears and represented that it planned to drop its claim that the merger of CN and WC would require Great Lakes

¹ This is a principal AK manufacturing facility.

to stop serving AK's Butler facility.² When Great Lakes made this concession, AK withdrew its pending motion to compel.³

Now, with only a few days left before comments are due in this case, DMIR has filed a motion to compel seeking documents relating to AK's transportation arrangements for moving taconite pellets from the Minnesota Iron Range to AK's Middletown Ohio facility.⁴ These pellets currently move from the Iron Range to Middletown via direct rail (for some movements) or rail-vessel-rail (for others).

Great Lakes argues that its requests are relevant because they may "shed light" on: (i) whether AK "will divert even more of its Middletown taconite to an all-rail route in the future;" and (ii) whether "other taconite receivers" may "switch to all-rail deliveries if a merged CN/WC pursues this business." See Motion to Compel at 6. These relevance claims are absurd.

First, AK does not use Great Lakes' vessel service for its rail-water-rail move to Middletown. Its vessel carrier is Oglebay Norton. Thus, no AK Middletown traffic is subject to "diversion" from a Great Lakes vessel. Such "diversions" appear to form the core of Great Lakes' opposition to the CN/WC merger

² See Great Lakes' June 14, 2001 Opposition to AK Steel's Motion to Compel at 5, 7 ("Great Lakes no longer expects to argue that AK Steel and other shippers on the southern part of the B&LE line are likely to lose rail service if the merger is approved.").

³ See AKS-5, filed June 15, 2001.

⁴ This facility is another major AK manufacturing plant.

and the basis for its discovery requests. AK's vessel service to Middletown falls outside the scope of Great Lakes' represented concerns in this case.

Second, the claim that AK should be required to produce documents on the eve of the due date for comments because those documents may shed light on whether "other" shippers are likely to divert traffic from Great Lakes' service is preposterous. Any such discovery should be directed at the "other shippers," not AK.

Third, the requested information involves routing choices AK made years ago. This information has no conceivable bearing on the proposed merger of CN and WC. In any event, AK stipulates here that it has no studies or analyses that address what impact, if any, the proposed merger of CN and WC would have on any routing of future deliveries of taconite to its Middletown facilities, assuming the merger of CN and WC is approved.

The STB encourages shippers to participate in merger cases. AK intervened due to a specific and substantial threat raised by Great Lakes -- abandonment of service for one of its principal manufacturing facilities. The Board should not allow

Great Lakes to harass AK with last minute, irrelevant discovery claims.

Respectfully submitted,

By: John H. LeSeur 
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Dated: June 19, 2001

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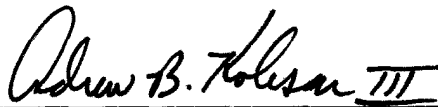
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document
was served this 19th day of June, 2001 by hand upon:

Carolyn F. Corwin, Esq.
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Paul A. Cunningham, Esq.
Harkins Cunningham
801 Pennsylvania Ave., N.W.
Suite 600
Washington, D.C. 20004-2664

and by first-class mail, postage prepaid upon all other parties
of record to this case.


Andrew B. Kolesar III