

202690

NRPC-3

BEFORE THE
SURFACE TRANSPORTATION BOARD

STB Finance Docket No. 34000

CANADIAN NATIONAL RAILWAY CO.,
GRAND TRUNK CORP., AND
WC MERGER SUB, INC.

- CONTROL AND MERGER -

WISCONSIN CENTRAL TRANSPORTATION CORP.,
WISCONSIN CENTRAL, LTD., FOX VALEY & WESTERN, LTD.,
SAULT ST. MARIE BRIDGE CO., AND
WISCONSIN CHICAGO LINK, LTD.



AMTRAK'S COMMENTS

ENTERED
Office of the Secretary
JUN 20 2001
Part of
Public Record

Richard G. Slattery
NATIONAL RAILROAD PASSENGER
CORPORATION (AMTRAK)
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Attorneys for National Railroad
Passenger Corporation (Amtrak)

Date: June 20, 2001

The National Railroad Passenger Corporation ("Amtrak") hereby submits its comments on the application by the Canadian National Railway ("CN") and its affiliates for control of Wisconsin Central Transportation Corp. ("WC") and its affiliates.

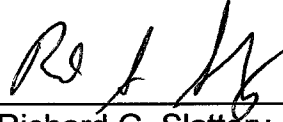
At page 394 of their application, Applicants assert that CN's merger with the Illinois Central Railroad ("IC") "did not cause problems with Amtrak's passenger service." That statement is not entirely correct. Since the consummation of the CN-IC merger on July 1, 1999, there has been a noticeable decline in the on-time performance of Amtrak's "Illini", which operates over the former IC north-south main line between Chicago and Carbondale, IL (the portion of the CN-IC system that was projected to experience the greatest merger-related increases in traffic). On-time performance of the northbound Illini, measured under the "incentive" performance provisions incorporated in Amtrak's contract with IC,¹ has declined from more than 92% during the 12-month period preceding consummation of the CN-IC merger to approximately 77% during the most recent 12-month period for which complete data are available (April 2000-March 2001). This decline in performance, most of which has occurred since last fall, is primarily attributable to increased freight train interference.

Amtrak and CN are working cooperatively in an effort to improve the Illini's performance, and the application in this proceeding projects that there will be only a modest increase in freight traffic between Chicago and Carbondale (approximately one additional freight train per day) if the CN-WC merger is approved. Given these

¹ When on-time performance is measured for incentive compensation purposes, delays due to certain causes not within the freight railroad's control, such as delayed departures from a train's origin, longer than scheduled station stops, and delays due to mechanical problems with Amtrak equipment, are excluded. Thus, the percentage of trains that actually arrive on time is less than these figures would suggest.

circumstances, Amtrak does not oppose, or ask the Board to impose conditions upon, the CN-WC merger.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "R. G. Slattery", is written over a horizontal line.

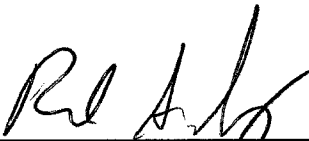
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Attorney for
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Date: June 20, 2001

CERTIFICATE OF SERVICE

I certify that I have, this 20th day of June, 2001, served copies of the foregoing Amtrak's Comments by first class mail, postage prepaid, upon all parties of record in this proceeding.



Richard G. Slattery