

202725



Wisconsin Department of Transportation

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June 22, 2001

Surface Transportation Board
Office of the Secretary
Case Control Unit
1925 K Street NW
Washington DC 20423-0001

ENTERED
Office of the Secretary

JUN 25 2001

Part of
Public Record



RE: **STB Finance Docket No. 34000**
Canadian National – Control – Wisconsin Central

Dear Secretary Williams:

Enclosed find the original and twenty-five (25) copies of the comments filed on behalf of the Wisconsin Department of Transportation. Also enclosed is the disk specified in the Board's notice containing the text of this cover letter, the enclosed Comments, and Affidavit of Service in a format compatible with WordPerfect 9.0.

Also enclosed is a duplicate of this cover letter and return mail envelope, postage prepaid, for your stamped confirmation of receipt.

Sincerely,

A handwritten signature in cursive script, reading "Allyn Lepeska".

Allyn Lepeska
Attorney

Enclosure

cc: Ron Adams

202725

WISDOT-2

BEFORE THE SURFACE TRANSPORTATION BOARD

STB Finance Docket No. 34000

CANADIAN NATIONAL RAILWAY COMPANY,
GRAND TRUNK CORPORATION, AND WC MERGER SUB, INC.
-CONTROL-
WISCONSIN CENTRAL TRANSPORTATION CORPORATION,
WISCONSIN CENTRAL LTD., FOX VALLEY & WESTERN LTD.,
WISCONSIN CHICAGO LINK LTD.

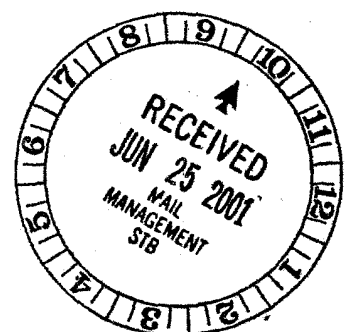
COMMENTS OF WISDOT

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June 22, 2001



BEFORE THE SURFACE TRANSPORTATION BOARD

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COMMENTS OF WISDOT

The Wisconsin Department of Transportation ("WisDOT") is the designated state agency in rail matters in Wisconsin. 49 U.S.C. § 10101 et seq., 49 C.F.R. § 266.1 and Ch. 85, Wis. Stats.

Wisconsin Central Limited ("WCL") is a common carrier by rail engaged in the business of providing interstate rail freight services. WCL began operation by acquiring rail line from Soo Line Railroad. Wisconsin Central Ltd.--Exemption Acquisition and Operation--Certain Lines of Soo Line Railroad Company, Finance Docket No. 31102 (ICC served Sept. 11, 1987, Oct. 8, 1987 and July 28, 1988). In 1993, Wisconsin Central Transportation Company ("WCTC"), formed the Fox Valley Western to

acquire the Fox River Valley Railroad, Green Bay Western, and the Ahnapee & Western Railroad. In 1997, WCTC subsidiary, Sault Ste. Marie Bridge Company acquired 220 route miles of rail lines and trackage rights from the Union Pacific. In 1999, WCTC formed Wisconsin Chicago Link Limited to acquire 4.1 miles of track within the Chicago terminal.

WisDOT and WCL and its related entities have had good business relationships with some minor disagreements throughout the years. WisDOT has provided quality freight rail service to its Wisconsin customers in a timely manner. Until recently, WCL and its related entities did not abandon any active rail customer. Recently, they have been filing some applications for abandonment on corridors with limited shipments. At all times, WCL and its related entities have been responsive to WisDOT, shippers and others.

WisDOT does not have experience with Canadian National Railway Company and its subsidiaries ("CN"). Officials of CN did meet with WisDOT and stated that this merger would be phased in resulting in enhancements to the current level of service now provided by WCL and its related entities.

WisDOT is in the process of updating its Freight Rail Plan. Good freight rail service is essential to provide jobs and economic growth in

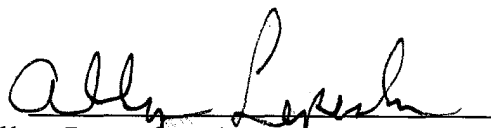
Wisconsin. Demand for freight rail service has exceeded expectation and demand is projected to increase.

CN has assured WisDOT that this good business relationship will continue and it will continue to provide quality rail service. WisDOT requests that CN:

- Keep existing interline CN and WCL and related entities gateways open,
- Preserve existing low density lines,
- Respond timely and reasonably to requests related to crossings and right-of-way from WisDOT and other governmental entities,
- Minimize employment losses,
- Cooperate with existing Wisconsin railroads,
- Provide quality service at reasonable price to grow the demand for freight rail service, and
- Work with WisDOT to implement new passenger rail service.

WisDOT supports the approval of the Applicant's application for authorization to acquire control of WCTC and through it of WCTC's rail carrier subsidiaries.

Dated this 22nd day of June, 2001.


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CERTIFICATE OF SERVICE

I, Julie A. Johnson, Paralegal for the Wisconsin Department of Transportation, hereby certify that on this 22nd day of June, 2001, I caused a copy of WISDOT Comments to be served by first-class mail as indicated below, with the exception of Paul A. Cunningham and William Sippel, which were sent via UPS overnight mail:

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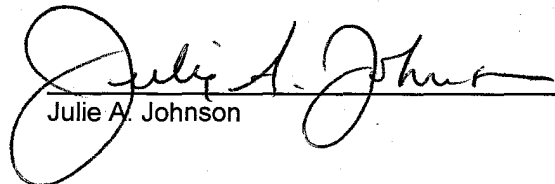
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