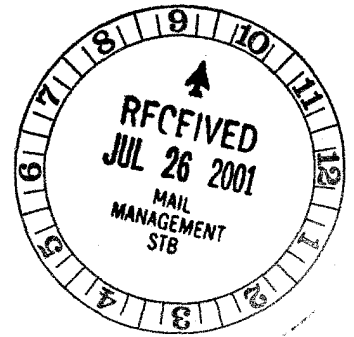


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BEFORE THE
SURFACE TRANSPORTATION BOARD



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.,
SAULT STE. MARIE BRIDGE COMPANY, AND
WISCONSIN CHICAGO LINK, LTD.

ENTERED
Office of the Secretary

JUL 26 2001

Part of
Public Record

REPLY COMMENTS OF IMC GLOBAL, INC.

IMC Global, Inc. (IMC) submits these reply comments in response to the comments filed by Canadian Pacific Railway Company (CP) on June 25, 2001. IMC supports the condition requested by CP that would require CN-WC to quote commercially reasonable joint rates for transportation to or from points on WC not only at the request of a shipper, but also upon request by other railroads that connect with WC. IMC asks the STB to impose CP's proposed condition if it decides to approve the CN-WC merger.

IMC produces potash at several locations in Saskatchewan, including Esterhazy, Belle Plaine and Colonsay. Rail service to these facilities is provided by both CP and CN. IMC ships potash to a number of customers who are located at points served by WC, including Green Bay, Owen, Port Edwards, Amherst Junction, Dorchester, White Lake, Francis Creek, West Bend, Plover Stockton and Fond du Lac, Wisconsin. During the year 2000, IMC shipped a total of 2188 carloads of potash to WC-served customers using a rail route involving CP from origin to the Twin Cities gateway, where the cars were interchanged to WC for delivery. The availability of joint-line routes involving both CP and CN for this traffic provides IMC effective competition for shipments to WC's service territory.

IMC is concerned about the potential impact of a CN-WC consolidation on the continued availability of effective competition via the CP-WC routes. Under the terms of a settlement agreement between CN and the National Industrial Transportation League (NITL), Applicants say that they will continue to make available commercially reasonable rates for shipments to WC's service area via routes involving railways other than CN "at the request of a shipper." This agreement alone is unlikely to preserve entirely IMC's existing competitive options.

Like many shippers, IMC relies upon the carrier serving our facilities to make arrangements with connecting carriers for all joint-line shipments. CP negotiates the rate for WC's portion of our potash shipments to WC territory, and quotes IMC a single rate for the entire movement. Under the CN-NITL agreement, IMC would be required to conduct separate rate negotiations with CP and WC (CN) to obtain rate for their respective portions of a shipment using the CP-Twin Cities -WC route. This requirement would impose a new administrative burden on IMC, by doubling the workload associated with using a CP-WC route in the future. This burden would be significant, as IMC's transportation rate staff consists of only two persons. CP's proposed condition would eliminate this burden, and would enable IMC to arrange transportation to WC-served points in the same manner as it does today.

CP's proposed condition would also make the remedies set forth in the CN-NITL agreement more effective. CP possesses greater resources and ratemaking expertise than IMC, putting it in a better position than us to evaluate the reasonableness of a rate quoted by WC (CN) and, where necessary, to obtain a reasonable rate through the arbitration process.

For these reasons, IMC believes that the condition proposed by CP is necessary to fully preserve the benefits of competition via interline routes to WC-served points with carriers other than Applicants. If CN and WC are truly committed to maintaining "open" gateways, they should not object to this proposed condition, which

would facilitate the development of joint line rates in the same manner as they are arranged today.

Submitted by:



David G. Johnson
Director – Rail Transportation
IMC Global, Inc.

CERTIFICATE OF SERVICE

I hereby certify on this 25th day of July, 2001, that copies of the Reply Comments of IMC Global, Inc. were served by first-class mail on all Parties of Record.



David G. Johnson