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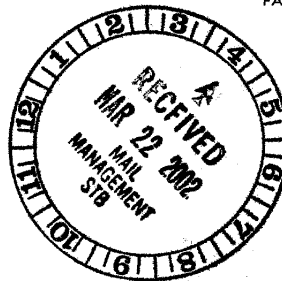
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March 22, 2002



### BY HAND

The Honorable Vernon A. Williams, Secretary  
Surface Transportation Board  
1925 K Street, N.W., Room 711  
Washington, D.C. 20423-0001

**RE: STB Finance Docket No. 34040, Riverview Trenton Railroad Company –  
Acquisition and Operation in Wayne County, Michigan**

Dear Secretary Williams:

Riverview Trenton Railroad Company ("RTR") states incorrectly in its reply filed yesterday in the above-captioned matter (at page 29, note 25) that "despite the flood of paper they have filed in this proceeding, the Opponents have not endeavored to address the *Effingham*, *Associated P&C Dock* [sic] or other legal precedents that RTRR has advanced on numerous occasions." The *Effingham* and *P&C Dock* cases, upon which RTR would rely so heavily, were addressed in our reply comments to new issues raised by RTR, filed on February 8, 2002, which explained (at pages 8-11) why those cases do not support RTR's position. In that pleading, and elsewhere, we have also addressed other relevant legal precedents, including, most importantly, the noticeable lack of *any* precedent for granting Board authority to operate an intermodal facility as a separate Board-regulated rail common carrier (*see, e.g., id.* at 6).

Sincerely yours,

David A. Hirsh

Counsel for Grand Trunk Western  
Railroad Incorporated

cc: All parties of record