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April 26, 2002

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Office of the Secretary

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Public Record



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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 has recently become aware of a letter dated March 29, 2002 from Mr. Michael Wilkinson of Detroit Steel Company and Detroit Cold Rolling Company (DSC) to the Surface Transportation Board, stating that DSC does not support RTRR's petition for authorization to operate as a railroad. The letter was not served on all parties of record and came to RTRR's attention only after a copy was provided to an official of an affiliate of RTRR by DSC.

In his recent letter, Mr. Michael Wilkinson acknowledges that the Vice President of DSC, Mr. Matthew Wilkinson, submitted an April 16, 2001 letter to the Board in support of RTRR's efforts to secure operating authority in Docket No. 33980 -- a letter which RTRR attached to its March 7, 2002 filing providing supplemental evidence in this proceeding. That April 16 DSC letter notes the June 2, 2000 Railroad Easement Agreement entered by DSC, which will allow RTRR trains to operate over tracks on DSC's property, and also describes how DSC intends to benefit from RTRR's rail service with respect to DSC's own rail traffic. (A copy of the Railroad Easement Agreement accompanies RTRR's May 1, 2001 Petition for Exemption filed in this proceeding.) At the time of its March 7, 2002 submission, RTRR had no reason to believe that DSC had changed its position as it had received no such communication from DSC prior to that date. Moreover, Mr. Matthew Wilkinson's April 16 letter was submitted in the context of (1) the easement transaction between RTRR and DSC and (2) the fact that DSC, through a purchase agreement executed by Mr. Michael Wilkinson, had sold to RTRR's affiliate the property (including the tracks) on which RTRR intends to focus its operations.

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In order to remove any uncertainty the Board might have on this matter, RTRR continues to hold the easement to operate over DSC's property and of course will hold itself out to serve DSC were it to obtain an exemption from the Board to operate over the line traversing DSC's property. Further, Mr. Michael Wilkinson's stated reason for changing DSC's position is that if RTRR becomes a railroad "its accompanying power of condemnation . . . could be disastrous for our business." RTRR does not understand DSC's concern. RTRR has never given DSC or anyone else any reason to believe that it intended to use any condemnation authority to take DSC property. DSC did not express any such concern to RTRR's affiliate at any time during negotiations over the sale of the property or easement, nor has it raised the issue in conversations with RTRR at any other time. RTRR first learned of this concern when Wayne County, the City of Trenton and Grand Trunk Western Railroad Incorporated included a letter from DSC in their joint March 7, 2002 supplemental evidence. While the specter of condemnation by RTRR may have been suggested to DSC by Wayne County or its allies as a tactic to undermine support for RTRR's Petition, RTRR assures DSC and the Board that the concern is entirely unfounded.¹

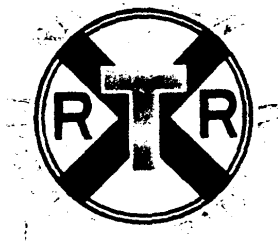
Respectfully,



David H. Coburn
Attorney for Riverview Trenton Railroad
Company

cc: All parties of record

¹ RTRR's April 25, 2002 written response to Mr. Michael Wilkinson is attached for the Board's information.



12225 Stephens Road, Warren, MI 48089

25 April 2002

RE: Riverview Trenton Railroad Company
STB Finance Docket No. 34040

Dear Mr. Wilkinson:

I received a copy of the March 29 letter to Secretary Williams that you provided to Dick Bartscht at a recent meeting between the two of you. Needless to say, I was disappointed by your letter, which I believe is based on an unfounded concern on your part about RTRR's goals and intentions. I can assure you that we have given no consideration to "taking" any DCR/DSC property and that this is not the reason we are pursuing our efforts before the Board. (In fact, it seems to us that you might more reasonably be concerned with the possibility that Wayne County or the City of Trenton might want to condemn your property in Trenton.)

I can assure that if the STB allows us to operate as a short line railroad, RTRR intends to make its services available to your company, just as our rail services will be available to the general shipping public. We believe that RTRR's services will be beneficial in meeting DCR/DSC's transportation needs. As we have explained to the STB, RTRR is seeking Board authorization to operate as a railroad because rail operations, not merely operation of an intermodal facility, is an essential element of its business plan. RTRR's business model would merge the core competencies of Class I rail service and of truck service into an improved traffic flow process with velocity, flexibility, improved efficiency and simplicity for the customer. RTRR will manage the short haul portion of the operation, while serving as a coordinator and facilitator for the entire shipment, offering a single point of contact for shippers such as DCR/DSC and boutique services as needed. RTRR also intends to provide terminal services and to develop mutually advantageous relationships with all major North American railroads and attractive rate arrangements for shippers.

The selection of a site that would allow RTRR to provide rail services in conjunction with Class I railroads was a critical element in realizing the vision of expanded intermodal usage for the shippers focused on Detroit area freight. As you know, our site, and our easement allowing rail operations over the DCR/DSC property, are ideal for this purpose.

Mr. Michael Wilkinson
25 April 2002
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Finally, I hope that you understand that because RTRR's business plan contemplates its provision of rail transportation services in conjunction with Class I railroads, for freight moving in interstate commerce, RTRR believes that its planned activities are subject to STB jurisdiction. RTRR therefore must seek Board authorization or exemption to operate as a common carrier railroad and it is for that reason, and no other, that we are pursuing our efforts before the Board.

I trust that this clarifies RTRR's perspective for you. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Riverview Trenton Railroad Company



Mickey Blasfield
Director - Governmental Relations

Mr. Michael Wilkinson
President and CEO
DCR
1491 West Jefferson Avenue
Trenton, MI 48183

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