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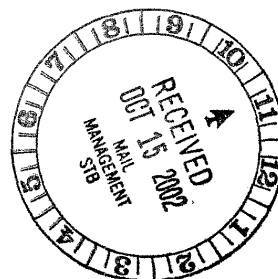
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OCT 15 2002

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Public Record

October 9, 2002

Surface Transportation Board
Office of the Secretary
Case Control Unit
1925 K Street, N.W.
Washington, D.C. 20423-0001



Re: STB Finance Docket No. 34178
Dakota, Minnesota & Eastern Railroad Corporation and
Cedar American Rail Holdings, Inc. - - Control - -
Iowa, Chicago & Eastern Railroad Corporation

Dear Sir:

Please consider this letter as notification by the Brotherhood of Locomotive Engineers ("BLE") of its intent to participate in the above-captioned case.

BLE is opposed to the grant of the application by Dakota, Minnesota & Eastern Railroad Corporation ("DM&E"), Cedar American Rail Holdings, Inc. ("Holdings"), and Iowa, Chicago & Eastern Railroad Corporation ("IC&E") seeking Board approval and authorization under 49 U.S.C. 11321-26 for DM&E's acquisition of control of IC&E through ownership of IC&E's stock by Holdings, which is itself a wholly owned subsidiary of DM&E.

As the Board is aware, BLE is a member of the Cooperating Labor Organizations ("CLO"). CLO has pending before this agency a petition to vacate and set aside the exemption the Board allowed to become effective in STB Finance Docket No. 34178, Iowa, Chicago & Eastern Railroad Corporation - - Acquisition and Operation Exemption - - Lines of I&M Rail Link, LLC.

In their filings, BLE and the other organizations have, we submit, introduced probative evidence that IC&E and Holdings are alter egos of DM&E and that the financial transactions being engaged in by DM&E are shams and merely being taken for the purposes of circumventing the collective bargaining agreements between the involved unions and I&M Rail Link to evade and any protections the employees would be entitled to if appropriate filings had been made under the Act.

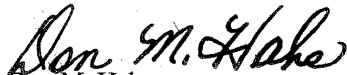
BLE, therefore, strongly opposes this application as the final step in this invalid transaction, which

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cannot be sanctioned under the statutory provisions governing the agency.

A copy of this letter has been served in accordance with Decision No. 2, having an effective date of September 27, 2002. Also enclosed is a 3.5 inch floppy disk in Word Perfect 9.

Very truly yours,



Don M. Hahs

International President

cc: Secretary of the United States Department of Transportation
400 Seventh Street, SW
Washington, D.C. 20590

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c/o Assistant Attorney General
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