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IMC Chemicals Inc.
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Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings

JUL 31 2003

Part of
Public Record

Re: Kansas City Southern/NAFTA Rail,
Finance Docket No. 34342

Dear Secretary Williams:

I am William J. McGinn, Director of Distribution for IMC Chemicals Inc. IMC Chemicals Inc. operates a chemical manufacturing facility in Trona California and its cooperate office is located in Overland Park Kansas. Our facility in Trona California manufactures approximately 1,700,000 tons of chemicals including sodium carbonate, sodium sulfate and various sodium borates. Our products are shipped through out North America and to 30 countries around the world.

IMC shipments to Mexico of sodium sulfate and sodium borates total approximately 20,000 tons annually. All shipments are made via the Union Pacific Railroad and the Laredo Texas gateway is used exclusively.

While IMC supports the proposed NAFTA rail transaction, IMC is very concerned about the effect of the merger on UP customers using the Laredo Texas gateway. IMC hopes the Surface Transportation Board proposes conditions that ensure that NAFTA Rail lives up to the stated Kansas City Southern Railway Company commitments.

I, William J. McGinn, declare under penalty of perjury that the foregoing is true and correct. Further I certify that I am qualified and authorized to file this verified statement.

Executed on July 23, 2003

William J. McGinn