



6500 Archer Avenue
Bedford Park, IL 60501



August 10, 2000

Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20006

**Re Docket No. 42052, Union Pacific Railroad Company --
 Petition for Declaratory Order -- Unilaterally Imposed
 Interchange Charges**

Dear Secretary Williams:

My name is Thomas Waskiewicz and I am Director of North American Logistics for Corn Products International. I am responsible to insure quality transportation and logistics services at the lowest cost insuring a solid supplier relationship and financial soundness.

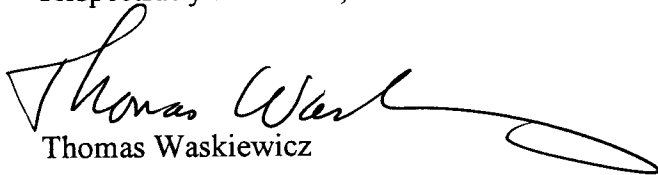
Corn Products International, Inc., is one of the world's largest corn refiners and a major supplier of high-quality food and industrial products. In 1999, the company reported sales of \$1.7 billion with operations in 22 countries. At issue is our largest plant located at Bedford Park, Illinois, which is served by the Indiana Harbor Belt Railroad Company ("IHB"). Over 14,000 cars (excluding empty returns) are moved yearly covering inbound raw materials as well as outbound finished products. As the IHB's second largest customer, we are directly affected by the delays and congestion caused by the linehaul carriers' failure to interchange traffic with IHB on a timely basis. We support all efforts to insure the timely movement of our loaded and empty cars and a fluid terminal operation.

We understand that the Union Pacific Railroad Company has asked the Board to invalidate an IHB charge that applies when a railroad such as UP refuses for more than nine hours to accept cars offered for interchange by IHB. Such refusals require IHB to store the cars somewhere on its lines or in its yards until such time as the linehaul railroad decides to accept them.

We strongly support retention of this charge and any other reasonable incentive that works to discourage railroads from allowing cars to sit on the IHB or on any railroad in the Chicago terminal. Such practices contribute to congestion on IHB and that hurts our business. In a highly competitive commodity market, Corn Products must compete with suppliers that are able to bypass the congestion and delays incurred in the Chicago Switching District. As we provide our own rail equipment, our assets are directly affected by the additional time incurred moving both loaded and empty equipment in the Chicago Switching District. As stated above, we receive coal and corn by rail, with inbound corn movements on the IHB in excess of 6,000 cars yearly. Congestion in the IHB yards will impact the IHB's ability to deliver this raw material to our plant and will if unchecked result in significant delays and increased cost of operations to our company. I strongly urge the Board to uphold IHB's charge.

Ten copies of this submission are attached for filing along with this original. I also have included an extra copy which I would request that you stamp and return to me in the provided envelope. A copy of this submission has been mailed to the parties on the attached service list.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Waskiewicz", with a long, sweeping horizontal line extending to the right.

Thomas Waskiewicz

Director of North American Logistics

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