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February 6, 2018

BY E-FILING

Ms. Cynthia Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

**Re: *Application of the National Railroad Passenger Corporation under 49 U.S.C.
§ 24308(A) – Canadian National Railway Company (Docket No. FD 35743)***

Dear Ms. Brown:

Enclosed for filing in the above-referenced docket please find the Reply of Illinois Central Railroad Company and Grand Trunk Western Railroad Company to Amtrak's Motion for Extension of Procedural Schedule.

Very truly yours,

/s/ David A. Hirsh
David A. Hirsh

Counsel for Illinois Central Railroad Company and
Grand Trunk Western Railroad Company

Enclosures

cc: Kevin M. Sheys, Esquire

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. FD 35743

APPLICATION OF THE NATIONAL RAILROAD PASSENGER CORPORATION UNDER
49 U.S.C. § 24308(a) – CANADIAN NATIONAL RAILWAY COMPANY

**REPLY OF ILLINOIS CENTRAL RAILROAD COMPANY AND GRAND TRUNK
WESTERN RAILROAD COMPANY TO AMTRAK’S MOTION FOR EXTENSION OF
PROCEDURAL SCHEDULE**

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February 6, 2018

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. FD 35743

APPLICATION OF THE NATIONAL RAILROAD PASSENGER CORPORATION UNDER
49 U.S.C. § 24308(a) – CANADIAN NATIONAL RAILWAY COMPANY

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WESTERN RAILROAD COMPANY TO AMTRAK’S MOTION FOR EXTENSION OF
PROCEDURAL SCHEDULE**

Illinois Central Railroad Company (“IC”) and Grand Trunk Western Railroad Company (“GTW”) (together, “CN”) hereby reply in opposition to the Motion of the National Railroad Passenger Corporation (“Amtrak”) for Extension of Procedural Schedule (“Motion”), filed February 5, 2017, which seeks to extend the filing date for reply briefs from February 16 to March 16, 2018.

The current schedule, which Amtrak proposed less than two months ago, provides for a 28-day interval between opening and reply briefs. Less than two weeks before the deadline, Amtrak moves to double it to 56 days. By way of justification, Amtrak says only this: “Due to certain unanticipated events, Amtrak needs more time to prepare Amtrak’s Reply Brief.” Motion at 2. Amtrak has not identified those events, or their effects on Amtrak’s brief preparation process, to CN or the Board.

Amtrak’s cryptic reference to “unanticipated events” fails to demonstrate the requisite “good cause” for an extension under 49 C.F.R. § 1104.7(b). Indeed, if the Board were to grant Amtrak’s Motion based solely on that reference, and over CN’s objection, it would establish a precedent for treating its “good cause” standard as a nullity.

Nevertheless, as an accommodation to Amtrak, CN does not object to a one week extension for reply briefs (to February 23, 2018).

Respectfully submitted,

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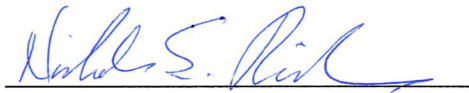
*Counsel for Illinois Central Railroad Company
and Grand Trunk Western Railroad Company*

February 6, 2018

CERTIFICATE OF SERVICE

I certify that I have this 6th day of February, 2018, caused a true copy of the foregoing Reply of Illinois Central Railroad Company and Grand Trunk Western Railroad Company to Amtrak's Motion for Extension of Procedural Schedule to be served electronically upon the following counsel for the National Railroad Passenger Corporation:

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Nicholas E. Richards