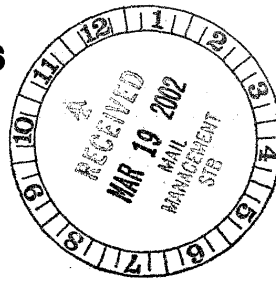




DON M. HAHS
International President

Brotherhood of Locomotive Engineers

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March 11, 2002

205003

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. 34177
Iowa, Chicago & Eastern Railroad Corporation - -
Acquisition and Operation Exemption - -
Lines of I&M Rail Link, LLC

ENTERED
Office of the Secretary

MAR 19 2002

Part of
Public Record

Dear Sir:

This letter is in opposition to a Notice of Intent by Iowa, Chicago & Eastern Railroad Corporation ("ICE"), identified by the STB as Finance Docket No. 34177, to be exempted pursuant to STB regulations at 49 C.F.R. §§1150.32(e) and 1150.35(a) from the requirements and obligations of 49 U.S.C. §10901-10906.

The Brotherhood of Locomotive Engineers ("BLE"), as the duly designated representative for the craft of locomotive engineers on I&M Rail Link, LLC ("IMRL"), submits that this Board must condition any such exemption by requiring applicant to protect employees who may be affected by the proposed transaction. Moreover, BLE requests the Board carefully review the request to determine whether ICE has adequate financing and expertise to exercise the authority sought for a lengthy period of time.

Moreover, BLE submits that the application has as its intent the circumvention of the collective bargaining agreements and bargaining rights between IMRL and BLE and also to negate any protections to which the IMRL employees represented by BLE would be entitled. In this regard, BLE submits that at the time ICE files its notice of exemption, the agency should, and must, consider the guarantees that these employees may have under the Milwaukee Railroad Restructuring Act, 45 U.S.C. §§901 et seq., and assumed from the Milwaukee Railroad by any subsequent purchaser of the involved lines and assets. Unless the Board takes all of these facts into proper consideration, the employees of IMRL, who will lose their jobs and have no protection under the proposed application contained in the notice, can only consider the process undertaken here to be a sham for purposes of evasion of their statutory and contractual rights.

BLE respectfully informs this Board that it intends to participate in whatever proceeding this Board may institute to consider the proposed request for exemption filed by the applicant herein. A copy of this letter has been served upon applicant.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "D. M. Hahs".

Don M. Hahs
International President

cc: William C. Sippel, Esq.
Fletcher & Sippel, LLC
Two Prudential Plaza, Suite 3125
180 North Stetson Avenue
Chicago, Illinois 60601-6721