



May 22, 2008

Anne K. Quinlan, Esquire
Acting Secretary
Surface Transportation Board
395 E Street, S.W.
Washington DC 20423-0001

Re: STB Finance Docket No. 35087)

Dear Ms. Quinlan:

I am President and CEO of the Iowa Interstate Railroad and I am writing concerning the proposed purchase of the EJ&E Railroad (EJ&E) by the Canadian National Railway Company (CN). The Iowa Interstate Railroad operates over 552 miles of track across the state of Iowa and into Illinois.

I am writing to support CN's request that a definitive time limit is established for the Board's environmental review and final decision in this matter.

The creation of the short line railroad industry was largely the result of the deregulation incorporated in the Staggers Act of 1980. An important part of that deregulation involved the creation of an expedited process for the creation of new short line railroad companies. Buying and successfully operating short line railroads requires substantial private financing and significant commitments on the part of railroad customers. These free market decisions cannot be successfully negotiated or maintained in an environment where regulatory approvals are withheld for indefinite periods of time. Bankers and shippers operate in a very competitive environment. They will wait for some period of time, but they will not wait for an unspecified period of time.

I am not intimately familiar with the specifics of the CN/EJ&E transaction. On its face it appears to result in reduced delays for rail transportation through Chicago. That result is good for the rail network in general and good for those of us that move our railcars through the Chicago gateway. Those benefits aside, I understand that a change in operating patterns impacts different communities in different ways and the STB has a responsibility to understand and review those impacts. I respectfully submit that your

review should not be for an indefinite period. Otherwise, the process itself rather than the merits could well dictate the final outcome.

I appreciate the opportunity to comment on this matter.

Sincerely

A handwritten signature in cursive script, appearing to read "Dennis H. Miller".

Dennis H. Miller
President and CEO
Iowa Interstate Railroad, LTD.