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May 21, 2026

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Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001

Re: *FD 36928, Unity Line, LLC d/b/a Manitowoc Port & Terminal
Railway – Operational Exemption – Rail Lines in Manitowoc County, WI*

The Unity Line, LLC d/b/a Manitowoc Port & Terminal Railway (“Unity Line” or “MP&TR”) submits this letter in reply to the letter filed by Wisconsin Central Ltd. (“WC/CN”) on May 19, 2026 (“WC/CN Letter”).

WC/CN’s Letter seeks to “alert the Board to substantial unanswered questions” it claims are raised by MP&TR’s Verified Notice of Exemption filed on May 6, 2026 (“Verified Notice” or “Notice”). WC/CN’s Letter is an unwarranted, thinly veiled attempt to delay and interfere with a significant project that seeks to increase freight volumes of interstate and foreign commerce at an underutilized port facility of regional and national importance.

WC/CN’s Letter raises no allegations that MP&TR’s Verified Notice failed to comply in any way with the Board’s governing rules and authorities, was incomplete, or contained any false or misleading information. Having failed to find any real issues, WC/CN instead seeks to raise “questions” about the Notice. None of the concerns raised by WC/CN has any merit or warrants further consideration or delay in the orderly processing of the Notice.¹

First, while WC/CN complains about the track descriptions in the Notice, MP&TR’s map exhibits and detailed descriptions are clearly accurate representations

¹ Besides the issues discussed below, WC/CN claims that this is not a “routine case arising under *Effingham R. Co. – Pet. For Declaratory Order*, 2 S.T.B. 606 (1997), *aff’d sub nom. United Transp. Union-Ill. Legis. Bd. v. STB*, 183 F.3d 606 (7th Cir. 1999).” However, while not required to do so, MT&TR specifically addressed and answered all questions arising under *Effingham* in its Notice (at 2-3), and on which WC/CN raises no objections or concerns.

commonly accepted by the Board. They are easily verified on Google Maps and/or Google Earth (although those views are not readily adapted to a filing with STB).

Second, WC/CN speculates about a possible lack of “headroom” for service on the lines. However, the application proposes, at the outset, that the current operations on Briess industry track continue as they have in the past and currently. Briess Industries, Inc. (“Briess”), is a 150-year old family business that is one of the largest and most respected producers of specialty malts, with a world-class processing campus in Manitowoc, Wisconsin. As verified in MP&TR’s Notice, Briess currently processes substantial bulk grain commodities to and from its facility and vessels on the Manitowoc River, which move via the Manitowoc Harbor to and from Lake Michigan and via the St. Lawrence Seaway to and from international waters. No additional headroom on WC/CN track has been or is required for such operations.

Third, WC/CN further speculates that the MP&TR may have inadequate interchange facilities to connect with WC/CN. However, there are two direct connections between the Unity Line and WC/CN (one will remain industry track). Nothing will change except WC/CN should enjoy new business, including substantial goods moving in foreign commerce. As addressed in the Notice (at 2, 4), when operations start, and grow, the parties can work out any and all operational and interchange issues that may arise, and as they are required to do, *e.g.*, 49 U.S.C. §§ 10742; 11103.

Fourth, WC/CN complains that MP&TR has “not approached WCL” about its plans, and suggests that its failure to do so somehow “cast[s] doubt on the feasibility” of the planned service. WC/CN’s feigned lack of consultation is disingenuous and meritless. In May 2023, Briess proposed to WC/CN an agreement for exempt lease or sale of WC/CN’s Manitowoc trackage for operations by a Briess owned Class III broader geographically than the current Unity Line Notice. Eight months later, in January 2024, WC/CN summarily declined to even respond to or discuss the Briess offer, despite multiple outreaches. Despite being a large and significant WC/CN regional customer, in fact the largest customer in the 50-mile corridor between Neenah and Manitowoc, who seeks to grow and take trucks off the road, in the almost 2.5 years since, no WC/CN sales representative has contacted Briess in any material way.

In fact, the scope of the Unity Line is geographically limited to Briess industry track only because of WC/CN’s unwillingness to consider other options to address Briess’ business needs and objectives for increasing its freight volumes and adding third-party freight transiting through Briess’ port facilities, despite many years of trying.

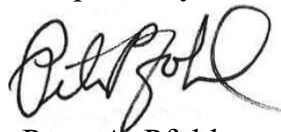
WC/CN’s lack of candor is troubling. The fact is that Briess and MP&TR, in cooperation with the State of Wisconsin, the City of Manitowoc, Members of Congress, and other public and private partners, are attempting to expand and grow their business,

despite WC/CN's continuing refusals to cooperate to date. The U.S. DOT recently awarded \$20 Million to the City of Manitowoc, in partnership with Briess and its affiliate, Grainshore LLC, through the Maritime Administration's (MARAD) Port Infrastructure Development Program to develop a multimodal facility at the Port to store and transport grain products between ships, trains, and trucks, thereby growing local and regional commerce. <https://www.world-grain.com/articles/22687-wisconsin-port-project-receives-federal-funding>; <https://www.baldwin.senate.gov/news/press-releases/baldwin-helps-deliver-20m-for-infrastructure-upgrades-at-port-of-manitowoc>. WC/CN's lack of support and cooperation in the establishment of this important Midwest grain hub, supporting farmers and businesses moving products across the U.S and overseas, is notable and unfortunate for all businesses that would benefit from these multimodal services, including the many hundreds of family farms with which Briess currently partners.

MP&TR's Verified Notice filing date was heavily influenced by the Federal Railroad Administration's recent announcement of over \$2 billion in grant funding for eligible projects under the Consolidated Rail Infrastructure and Safety Improvements program ("CRISI"), with applications due on June 22, 2026. <https://railroads.dot.gov/grants-loans/consolidated-rail-infrastructure-and-safety-improvements-crisi-program>. The new CRISI grant program is available to rail carriers, including Class III railroads. MP&TR's Notice is scheduled to be effective June 5, 2026, and it is currently working on applying for a CRISI grant to enhance its infrastructure and multimodal connections, and to facilitate service integration. MP&TR's eligibility for funding is dependent on the timely processing of its Notice, consistent with the requirements of 49 C.F.R. § 1150.32. Any delays will put its plans, and this important funding opportunity, in peril.

MP&TR urges the Board to orderly and timely process the Notice, to enable a project of regional and national significance, that presents substantial freight rail growth opportunities.

Respectfully submitted,



Peter A. Pfohl

*An attorney for Unity Line, LLC d/b/a
Manitowoc Port & Terminal Railway*

cc: John Duncan Varda, Esq.

CERTIFICATE OF SERVICE

I hereby certify this 21st day of May 2026, I caused a copy of the foregoing document to be served by first-class mail, postage prepaid, or by more expeditious means to all parties of record.

/s/ _____
Peter A. Pfohl