



03735.061308 ARMSTRONG BUS. 37027.S.N. LTR

Commercial Insurance Associates, LLC



June 13, 2008

Secretary Anne Quinlan and STB Commissioners
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Subject: CN Railway Acquisition of EJ&E, STB Docket Number 35087

Dear Secretary Quinlan and Commissioners:

I am writing to express my and my companies' support of the CN's proposed acquisition of the Elgin, Joliet & Eastern Railway in Illinois. This acquisition would improve rail service throughout the Chicago area, decongest the nation's biggest freight rail choke point, and infuse the local economy and railroad supply community with a large amount of needed infrastructure investment.

I have the pleasure to be involved with two companies that provide services to the railroad industry on a nationwide basis. I am a principal with Commercial Insurance Associates and an owner with my son Hunter Armstrong in the Rail Project Guide information service. With over 225 companies as clients being involved with building and maintaining track or operating shortline railroads, the impact of this CN/EJE transaction could well be the pump primer needed to get the Project CREATE effort up and working. I am also a board member of the National Railroad Construction & Management Association and support our Association's position in this endeavor.

The American freight railroad system is an environmental and economic success story. The U.S. has the world's most efficient freight rail network and that is an important competitive advantage in a global economy. The freight rail system is important for the environment because it helps keep trucks off the road and is a much more fuel-efficient way of moving freight than by highway or air. This proposed acquisition would help expand the freight system and should not be unnecessarily delayed.

Chicago is the major hub for North American rail traffic, and it currently suffers from congested rail corridors heading in and out of the City. Rerouting CN traffic from downtown to the less congested EJ&E line will result in more efficient rail operations for both CN and all of the major railroads. The positive environmental benefits of more efficient rail service will far outweigh any negatives by some suburban communities experience more frequent rail traffic. This transaction would benefit the rail shippers and also the rail contractor and supplier community.



Commercial Insurance Associates, LLC

June 13, 2008

We strongly support CN's Request for Establishment of Time Limits for NEPA Review and Final Decision. We do recognize that as train traffic moves off of downtown Chicago rail lines, some communities along the EJ&E right-of-way will experience train traffic increases. The STB's Section of Environmental Analysis (SEA) identified in its final scoping decision the issues that need to be studied in the Environmental Impact Statement (EIS) it is preparing. SEA has been examining these issues for the last several months and has provided many opportunities for interested citizens, community officials, and government agencies to provide comments. Under CN's proposed timetable, SEA will continue to have sufficient time to complete its study of these issues and the public will have the opportunity to again provide input to the STB during the period that will be provided by SEA for comment on the Draft EIS.

I understand and support the need for a meaningful environmental review. However, regulatory review should not be open-ended and should not be used to kill this important and beneficial proposed transaction. I urge the Board to complete its environmental review process expeditiously, and to approve the transaction as in the public interest.

If the review is open-ended, opponents of a project will be able delay a project so long that it is no longer feasible. This is a malicious and unfair use of the STB review process, and you should not allow this type of manipulation. Projects and transactions should be judged on their merits I believe the STB does a good job of that. But delays with no end in sight are not acceptable, especially in an industry where long-range planning and regulatory transparency is essential.

Thank you for your consideration of our views.

Sincerely,


David E. Armstrong
Principal
Commercial Insurance Associates, LLC &
Owner
Rail Project Guide

cc: Chairman Charles Nottingham
cc: Vice Chairman Francis Mulvey
cc: Commissioner Douglas Buttrey
cc: Environmental Analysis Section Chief Victoria Rutson