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June 17, 2022

VIA ELECTRONIC MAIL

Danielle Gosselin
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Finance Docket No. 36500, Sub-No. 1, Illinois Central R.R. Co. – Acquisition of a Line of R.R. Between Kansas City, MO, and Springfield and East St. Louis, IL – Kansas City Southern Ry. Co., et al.

Finance Docket No. 36500, Sub-No. 2, Illinois Central R.R. Co. – Trackage Rights Between Airline Junction, MO, and Grandview, MO – Kansas City Southern Ry. Co., et al.

Finance Docket No. 36500, Sub-No. 3, Canadian Nat'l Ry. Co. & Illinois Central R.R. Co. – Control – Gateway Eastern Ry. Co.

Finance Docket No. 36500, Sub-No. 4, Illinois Central R.R. Co. – Assignment of KCS Trackage Rights Between Rock Creek Junction, MO, and Airline Junction, MO – Union Pacific R.R. Co.

Request for Approval of Burns & McDonnell as Independent Contractor

Dear Ms. Gosselin:

I write on behalf of Illinois Central Railroad Company (CN) in FD 36500 (Sub-No. 1) regarding analysis of the environmental information set forth in CN's responsive application. As part of the responsive application, we would like to engage Burns & McDonnell (B&M), an approved third-party contractor, to work with the Office of Environmental Analysis (OEA) to prepare the necessary environmental documentation associated with the proposed divestiture of

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the Springfield line as condition and an alternative to the proposed CP-KCS merger.¹ We respectfully request approval of this selection in accordance with 49 C.F.R. § 1105.10(d).

Pursuant to 49 C.F.R. § 1105(d), we expect and understand B&M's work will be performed under the OEA's direction, supervision, and control. We can confirm that B&M is not presently engaged in any other projects for CN.

We look forward to your review of our request and are prepared to sign a disclosure statement upon approval. If you have any questions, please reach out.

Best regards,

A handwritten signature in black ink, appearing to read 'Peter Whitfield', with a stylized, cursive script.

Peter Whitfield

Partner
Sidley Austin
Attorney for CN

CC: Stephen Thornhill, Burns & McDonnell

¹ CN notes that its responsive application regarding divestiture of the Springfield Line is contingent upon STB finding the proposed merger in the public interest and approving the merger of CP and KCS.