

October 21, 2019

The Honorable Ann Begeman, Chairman
United States Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

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The Honorable Patrick J. Fuchs, Vice Chairman
United States Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings
October 21, 2019
Part of
Public Record

The Honorable Martin J. Oberman
United States Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

PUBLIC VERSION—HIGHLY CONFIDENTIAL MATERIAL OMITTED

Re: **STB Finance Docket 36299**
Soo Line Railroad Company Petition for Declaratory Order and Preliminary
Injunction - Interchange with Canadian National
Response to Questions Raised by the Board at Oral Argument

Dear Chairman Begeman, Vice Chairman Fuchs, and Commissioner Oberman:

I write regarding several items raised at the August 6, 2019 oral argument in this matter. At the argument the Board asked petitioner Soo Line Railroad Company d/b/a CP ("CP") to follow-up on certain questions.

Pursuant to the Protective Order entered by the Board on September 5, 2019 (Dec. No. 47213) ("Protective Order"), CP designates its response to two of the five questions raised by the Board as "HIGHLY CONFIDENTIAL." Accordingly, CP is filing a HIGHLY CONFIDENTIAL version of this letter simultaneously with the filing of this Public Version.

Question #1: What is the per car fees that CP pays the Belt Railway Company of Chicago ("BRC") under its contract?

Response: HIGHLY CONFIDENTIAL—CP will supply this information under seal pursuant to the protective order in this matter.

Question #2: Confirm that CP has no interchange that requires it or another carrier to travel more than 50 miles over the receiving carrier's line.

Response: CP performs no interchange that causes it to travel more than 50 miles on the receiving carrier's line. CP does not require another carrier to travel more than 50 miles over CP's line to effect interchange.

Question #3: What does CP pay Metra for use of the line?

Response: HIGHLY CONFIDENTIAL—CP will supply this information under seal pursuant to the protective order in this matter.

Question #4: Provide a comparison of the transit times between Bensenville and Kirk via Spaulding vs. over Clearing.

Response: CP has insufficient actual data to compare transit times between Bensenville and Kirk via Spaulding as compared to via Clearing. This is due in part to the fact that CP is currently interchanging all interchange traffic to CN over Clearing pursuant to an interim agreement and has very limited access to historical transit time data for traffic moving on CN between Spaulding and Kirk. To the extent such data are available, they are inconclusive as to whether one routing on average is faster than the other.

Question #5: Provide support for CP's position that reconfiguring tracks at Spaulding would mitigate blocked crossings.

Response: See attached drawing which reflect reconfiguration options for Spaulding discussed at oral argument. As noted at oral argument by counsel for CN, the topic was previously raised at mediation.

Respectfully Submitted,

/s/ David F. Rifkind

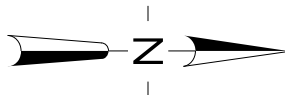
Counsel for Soo Line Railroad Company

cc: Parties of Record



LEGEND

- EXISTING TRACK
- PROPOSED TRACK
- REMOVE TRACK
- ELECTRIC LOCK
- DERAIL
- SIGNAL



STEARNSROAD

TO JOLIET

BARTLETT ROAD

SPAULDING ROAD

NORTH SIDING

TRACK 1

TRACK 2

TRACK 3

CN MAIN

TRACK 4

WEST WYE

EAST WYE

PARALLEL

BP-5

BP-4

TRACK 3

TRACK 2

TRACK 1

NO. 2 MAIN TRACK

NO. 1 MAIN TRACK

#1 NORTH

NYPRO

TO B-35

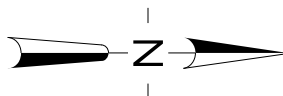
OPTION 1

CHICAGO, ILLNOIS
ELGIN SUBDIVISION



LEGEND

- EXISTING TRACK
- PROPOSED TRACK
- REMOVE TRACK
- ELECTRIC LOCK
- DERAIL
- SIGNAL



STEARNSROAD

TO JOLIET

BARTLETT ROAD

NORTH SIDING

TRACK 1

TRACK 2

TRACK 3

CN MAIN

TRACK 4

SPAULDING ROAD

BP-5

BP-4

TRACK 3

TRACK 2

TRACK 1

NO. 2 MAIN TRACK

NO. 1 MAIN TRACK

#1 NORTH

PARALLEL

WEST WYE

EAST WYE

NYPRO

TO B-35

OPTION 2

CHICAGO, ILLNOIS
ELGIN SUBDIVISION





CONFIDENTIAL
NOT FOR CONSTRUCTION

LEGEND

- EXISTING TRACK
- PROPOSED TRACK
- REMOVED TRACK
- SHIFTED TRACK

0' 50' 100' 200'
SCALE IN FEET

CP

SPaulding
CHICAGO, ILLINOIS
ELGIN SUBDIVISION
OPTION 2

DATE: OCTOBER 2, 2019