

HINSHAW

& CULBERTSON LLP

March 29, 2008

VIA E-MAIL AND REGULAR MAIL

Ms. Victoria J. Rutson, Chief
Section of Environmental Analysis
Surface Transportation Board
395 E. Street, S.W.
Washington, D.C. 20423-0001

ATTORNEYS AT LAW

400 South Ninth Street
Suite 200
Springfield, IL 62701-1908

217-528-7375
217-528-0075 (fax)
www.hinshawlaw.com

***Re: Canadian National Railway Company and Grand Trunk
Corporation - Control - EJ&E West Company, STB Finance
Docket No. 35087***

Dear Ms. Rutson:

I have received copies of the letters sent to you by counsel for the Applicants, Paul Cunningham, on January 28, 2008 and February 15, 2008 in which Mr. Cunningham enclosed some of the information requested by you in a December 18, 2007 letter to Normand Pellerin of the Canadian National Railway Company ("CN"). The purpose of this letter, among others, is to request a copy of the information that was provided to the Surface Transportation Board ("STB") in Mr. Cunningham's two letters. The letters themselves were posted on the STB's website, but it appears that the vast majority of the information provided by the Applicants was in electronic format on a compact disk. The information on the disks was not posted on the STB's website.

I am aware that some of the information I am requesting is designated "Confidential" and is therefore subject to the conditions of the governing protective order. I previously signed Exhibits A and B to the Protective Order in accordance with the terms of the protective order in order to review and receive information designated as confidential and highly confidential. Because those documents were forwarded to the Applicants in a January 7, 2008 letter addressed to Mr. Cunningham, I have signed additional copies of Exhibits A and B and have enclosed them with this letter. Also enclosed are similar statements executed by Charlie Tucker, a consultant with whom I intend to share some of the information I receive in response to this request.

In addition, I note that Mr. Cunningham's letter indicates that additional information will be forthcoming. If the Applicants have furnished any additional information to you, please forward that as well. I will pay any applicable copying charges.

The STB issued a decision on February 22, 2008 in which it denied the motions to compel discovery from the Applicants that was filed by my client, Will County, and the Village of Frankfort. The motions to compel were denied principally on the grounds that the discovery

Ms. Victoria J. Rutson, Chief
March 29, 2008
Page 2

they sought involved information more relevant to the environmental process. Specifically, on page 4 of the opinion, the STB's opinion stated: "The discovery responses sought by Frankfort and Will County pertain to the same issues that can and will be explored and addressed in the EIS."

Given the STB's statements and commitments, I have enclosed copies of the Will County and Village of Frankfort discovery that was the subject of the STB's order. Hopefully, the Section of Environmental Analysis ("SEA") will request the same information from the Applicants so that the issues we sought to raise in the other proceeding in this docket can and will be effectively explored and addressed in the EIS.

As you are aware, I provided you with my email and postal service address and requested that I be added to the STB's environmental distribution list. However, other than filings occasionally served upon me by the parties themselves, I have not received environmental related filings systematically or from you or the SEA. Please advise me whether there is some other action that I ought to take in order to assure that I receive copies of the environmental related filings, letters and rulings in this docket.

I thank you for your consideration. Please contact me, or have your staff contact me, if you have any questions.

Sincerely,

HINSHAW & CULBERTSON LLP



Edward R. Gower
egower@hinshawlaw.com

ERG:ljm
Enclosures

cc: Mary Tatroe

Surface Transportation Board
CIV-5348 EIS - FD-35037
Log and Distribution
Case No. _____
File No. _____

Seamus (JMS)
STACOP
Cc: Original - Job File

Exhibit A

UNDERTAKING – CONFIDENTIAL MATERIAL

I, Edward R. Gower, have read the Protective Order served on October 22, 2007, governing the production and use of Confidential Information and Confidential Documents concerning STB Finance Docket No. 35087, in the proceedings for regulatory authority for the creation of EJ&EW, and in related proceedings, understand the same, and agree to be bound by its terms. I agree not to use or permit the use of any Confidential Information or Confidential Documents obtained pursuant to that Protective Order, or to use or to permit the use of any methodologies or techniques disclosed or information learned as a result of receiving such data or information, for any purpose other than the preparation and presentation of evidence and argument in STB Finance Docket No. 35087, in the proceedings for regulatory authority for the creation of EJ&EW, and in related proceedings before the Surface Transportation Board, and/or any judicial review proceedings in connection with any of those proceedings. I further agree not to disclose any Confidential Information, Confidential Documents, methodologies, techniques, or data obtained pursuant to the Protective Order except to persons who are also bound by the terms of the Order and who have executed Undertakings in the form hereof, and that at the conclusion of this proceeding (including any proceeding on administrative review, judicial review, or remand), I will promptly destroy any documents containing or reflecting materials designated or stamped as "CONFIDENTIAL," other than file copies, kept by outside counsel, of pleadings and other documents filed with the Board.

I understand and agree that money damages would not be a sufficient remedy for breach of this Undertaking and that Applicants or other parties producing Confidential Information or Confidential Documents shall be entitled to specific performance and injunctive and/or other equitable relief as a remedy for any such breach, and I further agree to waive any requirement for the securing or posting of any bond in connection with such remedy. Such remedy shall not be deemed to be the exclusive remedy for breach of this Undertaking but shall be in addition to all remedies available at law or equity.

Signed: Edward R. Gower

Affiliation: Represent Will County

Dated: 3/28/08

Exhibit B

UNDERTAKING – HIGHLY CONFIDENTIAL MATERIAL

I, Edward, am outside (counsel) [consultant] for Will County, for whom I am acting in this proceeding. I have read the Protective Order served on October 22, 2007, governing the production and use of Confidential Information and Confidential Documents in STB Finance Docket No. 35087, in the proceedings for regulatory authority for the creation of EJ&EW, and in related proceedings, understand the same, and agree to be bound by its terms. I agree not to use or to permit the use of any Confidential Information or Confidential Documents obtained pursuant to that Protective Order, or to use or to permit the use of any methodologies or techniques disclosed or information learned as a result of receiving such data or information, for any purpose other than the preparation and presentation of evidence and argument in STB Finance Docket No. 35087, in the proceedings for regulatory authority for the creation of EJ&EW, and in related proceedings before the Surface Transportation Board, or any judicial review proceedings in connection with any of those proceedings. I further agree not to disclose any Confidential Information, Confidential Documents, methodologies, techniques, or data obtained pursuant to the Protective Order except to persons who are also bound by the terms of the Order and who have executed Undertakings in the form hereof.

I also understand and agree, as a condition precedent to my receiving, reviewing, or using copies of any information or documents designated or stamped as "HIGHLY CONFIDENTIAL," that I will take all necessary steps to ensure that said information or documents be kept on a confidential basis by any outside counsel or outside consultants working with me, that under no circumstances will I permit access to said materials or information by employees of my client or its subsidiaries, affiliates, or owners, and that, at the conclusion of this proceeding (including any proceeding on administrative review, judicial review, or remand), I will promptly destroy any documents containing or reflecting information or documents designated or stamped as "HIGHLY CONFIDENTIAL," other than file copies kept by outside counsel of pleadings and other documents filed with the Board.

I understand and agree that money damages would not be a sufficient remedy for breach of this Undertaking and that Applicants or other parties producing Confidential Information or Confidential Documents shall be entitled to specific performance and injunctive and/or other equitable relief as a remedy for any such breach, and I further agree to waive any requirement for the securing or posting of any bond in connection with such remedy. Such remedy shall not be deemed to be the exclusive remedy for breach of this Undertaking but shall be in addition to all remedies available at law or equity.

Signed: Edward R. Gower
OUTSIDE [COUNSEL] [CONSULTANT]

Dated: 3/28/08

Exhibit A

UNDERTAKING - CONFIDENTIAL MATERIAL

I, CHARLES M. TUCKER, have read the Protective Order served on October 22, 2007, governing the production and use of Confidential Information and Confidential Documents concerning STB Finance Docket No. 35087, in the proceedings for regulatory authority for the creation of EJ&EW, and in related proceedings, understand the same, and agree to be bound by its terms. I agree not to use or permit the use of any Confidential Information or Confidential Documents obtained pursuant to that Protective Order, or to use or to permit the use of any methodologies or techniques disclosed or information learned as a result of receiving such data or information, for any purpose other than the preparation and presentation of evidence and argument in STB Finance Docket No. 35087, in the proceedings for regulatory authority for the creation of EJ&EW, and in related proceedings before the Surface Transportation Board, and/or any judicial review proceedings in connection with any of those proceedings. I further agree not to disclose any Confidential Information, Confidential Documents, methodologies, techniques, or data obtained pursuant to this Protective Order except to persons who are also bound by the terms of the Order and who have executed Undertakings in the form hereof, and that at the conclusion of this proceeding (including any proceeding on administrative review, judicial review, or remand), I will promptly destroy any documents containing or reflecting materials designated or stamped as "CONFIDENTIAL," other than file copies, kept by outside counsel, of pleadings and other documents filed with the Board.

I understand and agree that money damages would not be a sufficient remedy for breach of this Undertaking and that Applicants or other parties producing Confidential Information or Confidential Documents shall be entitled to specific performance and injunctive and/or other equitable relief as a remedy for any such breach, and I further agree to waive any requirement for the securing or posting of any bond in connection with such remedy. Such remedy shall not be deemed to be the exclusive remedy for breach of this Undertaking but shall be in addition to all remedies available at law or equity.

Signed:

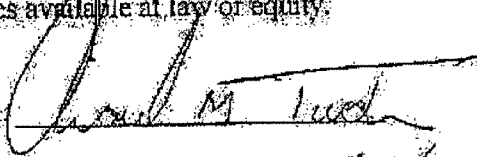

ORIGINALAffiliation: CONSULTANT for WILL COUNTYDated: JANUARY 24, 2008

Exhibit B

UNDERTAKING - HIGHLY CONFIDENTIAL MATERIAL

I, Charles M. Tucker, am outside [counsel] [consultant] for Will County, Illinois, for whom I am acting in this proceeding. I have read the Protective Order served on October 22, 2007, governing the production and use of Confidential Information and Confidential Documents in STB Finance Docket No. 35087, in the proceedings for regulatory authority for the creation of EJ&EW, and in related proceedings, understand the same, and agree to be bound by its terms. I agree not to use or to permit the use of any Confidential Information or Confidential Documents obtained pursuant to that Protective Order, or to use or to permit the use of any methodologies or techniques disclosed or information learned as a result of receiving such data or information, for any purpose other than the preparation and presentation of evidence and argument in STB Finance Docket No. 35087, in the proceedings for regulatory authority for the creation of EJ&EW, and in related proceedings before the Surface Transportation Board, or any judicial review proceedings in connection with any of those proceedings. I further agree not to disclose any Confidential Information, Confidential Documents, methodologies, techniques, or data obtained pursuant to the Protective Order except to persons who are also bound by the terms of the Order and who have executed Undertakings in the form hereof.

I also understand and agree, as a condition precedent to my receiving, reviewing, or using copies of any information or documents designated or stamped as "HIGHLY CONFIDENTIAL," that I will take all necessary steps to ensure that said information or documents be kept on a confidential basis by any outside counsel or outside consultants working with me, that under no circumstances will I permit access to said materials or information by employees of my client or its subsidiaries, affiliates, or owners, and that, at the conclusion of this proceeding (including any proceeding on administrative review, judicial review, or remand), I will promptly destroy any documents containing or reflecting information or documents designated or stamped as "HIGHLY CONFIDENTIAL," other than file copies kept by outside counsel of pleadings and other documents filed with the Board.

I understand and agree that money damages would not be a sufficient remedy for breach of this Undertaking and that Applicants or other parties producing Confidential Information or Confidential Documents shall be entitled to specific performance and injunctive and/or other equitable relief as a remedy for any such breach, and I further agree to waive any requirement for the securing or posting of any bond in connection with such remedy. Such remedy shall not be deemed to be the exclusive remedy for breach of this Undertaking but shall be in addition to all remedies available at law or equity.

Signed: Charles M. Tucker

OUTSIDE [COUNSEL] [CONSULTANT]

Dated: JANUARY 21, 2008**ORIGINAL**

BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 35087

CANADIAN NATIONAL RAILWAY COMPANY
AND GRAND TRUNK CORPORATION
—CONTROL—
EJ&E WEST COMPANY

VILLAGE OF FRANKFORT'S
FIRST REQUEST TO APPLICANTS
FOR PRODUCTION OF DOCUMENTS

Pursuant to the Surface Transportation Board's Decision No. 2 in this proceeding (served November 27, 2007) and 49 C.F.R. § 1114.30, the Village of Frankfort, Illinois ("Frankfort") hereby propounds its first request for production of documents to applicants Canadian National Railway and Grand Trunk Corporation ("Applicants"). The requested documents should be made available for inspection and copying at the offices of Winston & Strawn LLP, 1700 K Street, NW, 12th Floor, Washington DC 20006, no later than December 31, 2007.

Definitions and Instructions

The following definitions and instructions apply to the requests herein:

1. The term "and" also implies "or" and vice-versa.
2. The term "any" includes "all" and vice-versa.
3. The term "Application" means the Railroad Control Application filed in this proceeding on or about October 30, 2007.

4. The term "communication" means the transmittal of information, in the form of facts, ideas, inquiries, or otherwise.
5. The term "concerning" means referring to, describing, evidencing, or constituting.
6. The term "document" has the meaning set out in Rule 34(a) of the Federal Rules of Civil Procedure.
7. The term "each" includes "all" and vice-versa.
8. When referring to a person, to "identify" means to give, to the extent known, the person's full name, present address (or, if present address unknown, last known address), and, when referring to a natural person, the present (or, if present is unknown, last known) place of employment. Once a person has been identified, only the name of that person need be listed in response to subsequent discovery requesting identification of such person.
9. When referring to documents, to "identify" means to give, to the extent known, the type of document, general subject matter, date of the document, and all author(s), addressee(s), and recipients of the document.
10. A request for a document includes all drafts of that document and all copies of that document that differ from one another (e.g., by dint of having handwritten notations or other such different qualities).
11. The term "parties" includes the applicants and all other persons who have entered an appearance or given notice of intent to participate in the within proceeding. Where

applicable, the term also means the officers, directors, employees, partners, corporate parents, subsidiaries, and affiliates of such persons.

12. The term "person" means any natural person and any business, legal, or government entity or association.

13. The term "respondent" means the party responding to the discovery request.

14. A reference in the singular implies the plural as well, and vice-versa.

15. The term "vicinity of Frankfort" means the geographic area that includes (a) the Village of Frankfort, Illinois, and (b) the area extending along the existing or proposed rail line(s) and siding(s) or associated rights-of-way for three miles from the outer boundaries of the Village of Frankfort, IL and one mile on either side of such right-of-way.

16. This is a continuing request and should be supplemented in a timely manner if you learn that your disclosures or responses are incomplete or incorrect.

Requests

1. All documents that identify, discuss, or include projections or estimates of rail traffic in the vicinity of Frankfort, for any time period subsequent to that specifically addressed by Attachment A-2 to Exhibit 15 to the Application, including but not limited to (a) the number, length, speed, timing, and frequency of trains, (b) gross tonnage, (c) net tonnage, (d) the amount of time trains will spend on sidings and lines at one or more grade crossings, and amount of time of stoppage of motor vehicle, bicycle, and pedestrian traffic at each grade crossing, and (e) the

proportion of trains that will need to pull over onto a siding in or through the vicinity of Frankfort.

2. All documents that identify, discuss, or include a schedule, or projected or estimated schedule, of rail traffic in the vicinity of Frankfort.
3. All documents that identify, discuss, or include upgrades or improvements made during the past three years to the railroad tracks and crossings in the vicinity of Frankfort, including the nature, dates and costs thereof.
4. All documents that identify, discuss, or include projections, estimates, or evaluations of the nature, extent, quantity, frequency, aerial distribution, and dispersion of air pollutants emitted or released from locomotives and open rolling stock, including but not limited to projections or estimates of locomotives in motion or idling, and from motor vehicles waiting to cross any grade crossing, in the vicinity of Frankfort, for any time period.
5. All documents that identify, discuss, or include measurements, projections, estimates, or evaluations of the nature, extent, quantity, decibel level, 24-hour Average Day-Night Sound Level ("DNL" or " L_{dn} "), intensity, frequency, aerial distribution, and dispersion of noise (including but not limited to wayside noise—locomotive engine and wheel/rail noise—and horn noise) generated by or resulting from (a) trains in motion or idling, (b) noise from rail line, siding, and right-of-way construction, rehabilitation, and maintenance, (c) vibration generated by or resulting from any of the foregoing, and (d) synergies of any of the foregoing, in the vicinity of Frankfort, for any time period.

6. All documents that identify, discuss, or include measurements, projections, estimates, or evaluations of noise sensitive receptors that potentially would be exposed to noise referenced in Request No. 5 above, the DNL and L_{dn} levels thereof, and the underlying assumptions, methodologies, formulas, data, calculations, projections, estimates, and nighttime penalty of such DNL or L_{dn} levels and any other noise levels, in the vicinity of Frankfort, for any time period.

7. All documents that identify, discuss, or include any information, study, data, correspondence, or memorandum relating to potential impacts of the transactions and estimated increased rail traffic envisaged in this proceeding (including all the sub-numbers thereof) on the economic, market, aesthetic, or other values of properties abutting or located within one mile of the rail line, siding, and right-of-way, in the vicinity of Frankfort or elsewhere.

8. All documents that identify, discuss, or otherwise relate to traffic or other safety issues relating to the vicinity of Frankfort, including grade crossings and grade separations, for any time period.

9. All documents that identify, discuss, or include projections or estimates of motor vehicle, bicycle, or pedestrian traffic in the vicinity of Frankfort, including but not limited to (a) projections or estimates of the number and frequency of motor vehicles, bicycles, and pedestrians crossing and/or waiting to cross any grade crossing in the vicinity of Frankfort, for any time period, and (b) the length of time waiting to cross the existing or proposed railroad tracks in the vicinity of Frankfort.

10. All documents that identify, discuss, or include any information, study, data, correspondence, or memorandum relating to potential impacts on the environment of the

emissions or releases referred to in Request No. 4 above, the noise referred to in Request Nos. 5 and 6 above, or the projected or estimated rail traffic in or through the vicinity of Frankfort referred to in Request No. 1 and 2 above.

11. All documents that identify, discuss, or include any information, study, data, correspondence, or memorandum relating to potential impacts on human health or welfare of the emissions or releases referred to in Request No. 4 above, the noise referred to in Requests No. 5 and 6 above, or the projected or estimated rail traffic in or through the vicinity of Frankfort referred to in Requests No. 1 and 2 above.

12. All documents that identify, discuss, or include any information, study, data, correspondence, or memorandum relating to potential measures to mitigate the potential impacts referred to in Requests No. 1 through 11 above.

13. All documents that identify, discuss, or include any projection or estimate of the costs of measures to mitigate the potential impacts referred to in Request No. 12 above.

14. All documents that identify, discuss, or describe any staging areas, storage yards, security facilities, and other infrastructure and facilities anticipated or needed to support (a) the rail line and sidings that would be constructed, maintained or operated in or through the vicinity of Frankfort, at any time, and (b) the infrastructure and facilities needed to be modified, closed, or removed to support the rail line and sidings or the construction and operation thereof, in or through the vicinity of Frankfort, at any time.

15. All documents that identify, discuss, or include any information, study, data, correspondence, or memorandum relating to potential impacts to the environment or human

health or welfare of the construction, operation, modification, closure, or removal of the infrastructure and facilities referred to in Request No. 14 above, and potential measures to mitigate such impacts.

16. All documents created in the five years preceding the date of your response that identify, discuss, or include any information, study, data, correspondence, or memorandum relating to potential measures taken, implemented, or promised by, or imposed upon, Applicants to mitigate potential or actual impacts of increased rail traffic in situations or proceedings other than the instant proceeding.

17. All documents that identify, discuss, or include any information, study, data, correspondence, or memorandum relating to potential measures taken or to be taken, implemented or to be implemented, promised by, requested of, agreed to by, or imposed upon, Applicants or any related entity to mitigate, or related to, potential or actual impacts of increased rail traffic in connection with the Application or the instant proceeding.

18. All documents that identify, discuss, or include any projection or estimate of the costs of measures referred to in Request No. 17 above.

Respectfully submitted,



JAMES R. THOMPSON
ERIC L. HIRSCHHORN
JOHN FEHRENBACH
Winston & Strawn LLP
1700 K Street, NW
Washington DC 20006
202-282-5700

GEORGE F. MAHONEY III
Mahoney, Silverman & Cross, Ltd.
822 Infantry Drive, Suite 100
Joliet, Illinois 60435
815-730-9500

Attorneys for the Village of Frankfort, Illinois

December 21, 2007.

RECEIVED
DEC 26 2007

CERTIFICATE OF SERVICE

Hinshaw & Culbertson
SPRINGFIELD

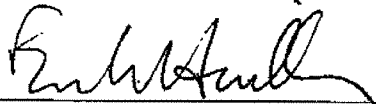
I hereby certify that on this 21st day of December 2007, a copy of the foregoing Request
for Production of Documents was served by first class mail, postage prepaid, on:

Secretary of Transportation
1200 New Jersey Ave., SE
Washington DC 20590

Attorney General of the United States
c/o Assistant Attorney General
Antitrust Division, Room 3109
Department of Justice
Washington DC 20530

Paul A. Cunningham (also by hand delivery)
Harkins, Cunningham LLP
1700 K Street NW, Suite 400
Washington DC 20006-3804

and upon each party listed in the service list for this proceeding as currently appearing on the
web site of the Surface Transportation Board.


Eric L. Hirschhorn

BEFORE THE
SURFACE TRANSPORTATION BOARD

Finance Docket No. 35087

CANADIAN NATIONAL RAILWAY COMPANY
AND GRAND TRUNK CORPORATION
—CONTROL—
EJ&E WEST COMPANY

VILLAGE OF FRANKFORT'S
FIRST SET OF INTERROGATORIES
TO APPLICANTS

Pursuant to the Surface Transportation Board's Decision No. 2 in this proceeding (served November 27, 2007) and 49 C.F.R. § 1114.26, the Village of Frankfort, Illinois ("Frankfort") hereby propounds its first set of interrogatories to applicants Canadian National Railway and Grand Trunk Corporation (collectively, "Applicants"). The within interrogatories should be answered, under oath, no later than January 7, 2008.

Definitions and Instructions

The following definitions and instructions apply to the interrogatories herein:

1. The term "and" also implies "or" and vice-versa.
2. The term "any" includes "all" and vice-versa.
3. The term "Application" means the Railroad Control Application filed in this proceeding on or about October 30, 2007.

4. The term "communication" means the transmittal of information, in the form of facts, ideas, inquiries, or otherwise.
5. The term "concerning" means referring to, describing, evidencing, or constituting.
6. The term "document" has the meaning set out in Rule 34(a) of the Federal Rules of Civil Procedure.
7. The term "each" includes "all" and vice-versa.
8. When referring to a person, to "identify" means to give, to the extent known, the person's full name, present address (or, if present address unknown, last known address), and, when referring to a natural person, the present (or, if present is unknown, last known) place of employment. Once a person has been identified, only the name of that person need be listed in response to subsequent discovery requesting identification of such person.
9. The term "parties" includes the applicants and all other persons who have entered an appearance or given notice of intent to participate in the within proceeding. Where applicable, the term also means the officers, directors, employees, partners, corporate parents, subsidiaries, and affiliates of such persons.
10. The term "person" means any natural person and any business, legal, or government entity or association.
11. The term "respondent" means the party responding to the discovery request.
12. A reference in the singular implies the plural as well, and vice-versa.

13. The term "vicinity of Frankfort" means the geographic area that includes (a) the Village of Frankfort, Illinois, and (b) the area extending along the existing or proposed rail line(s) and siding(s) or associated rights-of-way for three miles from the outer boundaries of the Village of Frankfort, IL and one mile on either side of such right-of-way.

14. The term "you" means the party or person responding to this discovery request, including its officers, employees, and agents.

15. This is a continuing request and should be supplemented in a timely manner if you learn that your disclosures or responses are incomplete or incorrect.

Interrogatories

1. Identify the individual employee or agent of respondent most knowledgeable about projections or estimates of rail traffic in the vicinity of Frankfort, including but not limited to (a) the number, length, speed, timing, and frequency of trains, (b) gross tonnage, (c) net tonnage, (d) the amount of time trains will spend on sidings and lines at one or more grade crossings, and amount of time of stoppage of motor vehicle, bicycle, and pedestrian traffic at each grade crossing, and (e) the proportion of trains that will need to pull over onto a siding in or through the vicinity of Frankfort.

2. Identify the individual employee or agent of respondent most knowledgeable about any schedule, or projected or estimated schedule, for rail traffic in the vicinity of Frankfort.

3. Identify the individual employee or agent of respondent most knowledgeable about upgrades or improvements, in the five years preceding your response to this interrogatory,

to the railroad tracks and crossings in the vicinity of Frankfort, including the nature, dates and costs thereof.

4. Identify the individual employee or agent of respondent most knowledgeable about projections, estimates, or evaluations of the nature, extent, quantity, frequency, aerial distribution, and dispersion of air pollutants emitted or released from locomotives and open rolling stock, including but not limited to projections or estimates for locomotives in motion or idling, and for motor vehicles waiting to cross one or more grade crossings, in the vicinity of Frankfort, for any past, present and future time period.

5. Identify the individual employee or agent of respondent most knowledgeable about any measurements, projections, estimates, or evaluations of the nature, extent, quantity, decibel level, 24-hour Average Day-Night Sound Level ("DNL" or " L_{dn} "), intensity, frequency, aerial distribution, and dispersion of noise (including but not limited to wayside noise—locomotive engines and wheel/rail noise—and horn noise) generated by or resulting from (a) trains in motion or idling, (b) noise from rail line, siding, and right-of-way construction, rehabilitation, and maintenance, (c) vibration generated by or resulting from any of the foregoing, and (d) synergies of any of the foregoing, in the vicinity of Frankfort, for any time period.

6. Identify the individual employee or agent of respondent most knowledgeable about any measurements, projections, estimates, or evaluations of noise sensitive receptors that potentially would be exposed to noise referenced in Interrogatory No. 5 above, the DNL and L_{dn} levels thereof, and the underlying assumptions, methodologies, formulas, data, calculations,

projections, estimates, and nighttime penalty of such DNL or L_{dn} levels and any other noise levels, in the vicinity of Frankfort, for any time period.

7. Identify the individual employee or agent of respondent most knowledgeable about any information, study, data, correspondence, or memorandum relating to potential impacts of the transactions and estimated increased rail traffic envisaged in this proceeding (including all the sub-numbers thereof) on the economic, market, aesthetic, or other values of properties abutting or located within one mile of the rail line, siding, and right-of-way, in the vicinity of Frankfort or elsewhere.

8. Identify the individual employee or agent of respondent most knowledgeable about traffic or other safety issues relating to the vicinity of Frankfort, including grade crossings and grade separations, for any time period.

9. Identify the individual employee or agent of respondent most knowledgeable about any projections or estimates of motor vehicle, bicycle, or pedestrian traffic in the vicinity of Frankfort, including but not limited to (a) projections or estimates of the number and frequency of motor vehicles, bicycles, and pedestrians crossing and/or waiting to cross any grade crossing in the vicinity of Frankfort, for any time period, and (b) the length of time waiting to cross the existing or proposed railroad tracks in the vicinity of Frankfort.

10. Identify the individual employee or agent of respondent most knowledgeable about any information, study, data, correspondence, or memorandum relating to potential impacts on the environment of the emissions or releases referred to in Interrogatory No. 4 above, the noise referred to in Interrogatory Nos. 5 and 6 above, or the projected or estimated rail traffic in or through the vicinity of Frankfort referred to in Interrogatory Nos. 1 and 2 above.

11. Identify the individual employee or agent of respondent most knowledgeable about any information, study, data, correspondence, or memorandum relating to potential impacts on human health or welfare of the emissions or releases referred to in Interrogatory No. 4 above, the noise referred to in Interrogatory Nos. 5 and 6 above, or the projected or estimated rail traffic in or through the vicinity of Frankfort referred to in Interrogatory Nos. 1 and 2 above.

12. Identify the individual employee or agent of respondent most knowledgeable about information, study, data, correspondence, or memorandum relating to potential measures to mitigate the potential impacts referred to in Interrogatory Nos. 1 through 11 above.

13. Identify the individual employee or agent of respondent most knowledgeable about projection or estimate of the costs of measures to mitigate the potential impacts referred to in Interrogatory No. 12 above.

14. Identify the individual employee or agent of respondent most knowledgeable about (a) staging areas, storage yards, security facilities, and other infrastructure and facilities anticipated or needed to support the rail line and sidings that would be constructed, maintained or operated in or through the vicinity of Frankfort, at any time, and (b) the infrastructure and facilities needed to be modified, closed, or removed to support the rail line and sidings or the construction and operation thereof, in or through the vicinity of Frankfort, at any time.

15. Identify the individual employee or agent of respondent most knowledgeable about information, study, data, correspondence, or memorandum relating to potential impacts to the environment or human health or welfare of the construction, operation, modification, closure, or removal of the infrastructure and facilities referred to in Interrogatory No. 14 above, and potential measures to mitigate such impacts.

Joliet, Illinois 60435
815-730-9500

Winston & Strawn LLP
1700 K Street, NW
Washington DC 20006
202-282-5700

Attorneys for the Village of Frankfort, Illinois

December 21, 2007

RECEIVED
DEC 26 2007

CERTIFICATE OF SERVICE

Hinshaw & Culbertson
SPRINGFIELD

I hereby certify that on this 21st day of December 2007, a copy of the foregoing First Interrogatories to Applicants was served by first class mail, postage prepaid, on:

Secretary of Transportation
1200 New Jersey Ave., SE
Washington DC 20590

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Antitrust Division, Room 3109
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Paul A. Cunningham (also by hand delivery)
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and upon each party listed in the service list for this proceeding as currently appearing on the web site of the Surface Transportation Board.



Eric L. Hirschhorn

BEFORE THE
SURFACE TRANSPORTATION BOARD

FINANCE DOCKET NO. 35087

CANADIAN NATIONAL RAILWAY COMPANY AND
GRAND TRUNK CORPORATION

-CONTROL-

EJ&E WEST COMPANY

WILL COUNTY'S REQUEST FOR PRODUCTION OF DOCUMENTS

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Counsel for Will County, Illinois

January 3, 2008

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 35087

**CANADIAN NATIONAL RAILWAY COMPANY AND
GRAND TRUNK CORPORATION
-CONTROL-
EJ&E WEST COMPANY**

WILL COUNTY'S REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to 49 C.F.R. §1114.30, Will County, Illinois ("Will County") directs the following requests for production upon Canadian National Railway Company, Grand Trunk Corporation, Elgin, Joliet and Eastern Railway Company, and EJ&E West Company. Will County requests that responses should be served as soon as possible, and in no event later than 15 days from the date of service hereof. Counsel for respondents should contact the undersigned promptly to discuss any objections or questions regarding these requests with a view to resolving any disputes or issues of interpretation informally and expeditiously. Will County will pay all reasonable costs for duplication and delivery of documents to counsel for the responding party.

DEFINITIONS

A. "Document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a). A draft or non-identical copy is a separate document within the meaning of the term.

B. "You" and "your" mean and refer to Canadian National Railway Company, Grand Trunk Company, Elgin, Joliet and Eastern Railway Company, and EJ&E West Company, as collective or individual respondents to the request for production of documents.

C. "EJ&E" means the Elgin, Joliet and Eastern Railway Company.

INSTRUCTIONS

If you withhold documents or information otherwise responsive to this request, please provide a privilege log that identifies for each document or part of a document withheld:

- a. The date of the document;
- b. The nature of the document;
- c. The author;
- d. All recipients;
- e. The subject matter; and
- f. The privilege or other basis for withholding production.

REQUESTS FOR PRODUCTION OF DOCUMENTS

The documents that you are requested to produce are described below:

1. The current EJ&E employee timetables for all EJ&E track.
2. The current EJ&E track charts for all EJ&E track.
3. A listing of the planned track work, bridge and signal work for calendar year 2007 for the EJ&E rail system.
4. A listing of the planned track, bridge and signal work for calendar year 2008 for the EJ&E rail system.
5. A listing of all track, bridge and signal work completed in calendar year 2007 on the EJ&E system.
6. Rail detector car histories for rail detector cars run on the EJ&E system in calendar years 2006 and 2007.
7. Federal Railroad Administration ("FRA") geometry car/dynamic loading car (T-100) runs or data collected for trips on the EJ&E system by such cars in calendar years 2006 and 2007.

8. Completed DV-107 forms for the right of way for the EJ&E current and projected expanded main track system in Will County, Illinois.

9. ICC valuation maps for the right of way for the EJ&E current and projected expanded main track system in Will County, Illinois.

10. All documents reflecting, referring or relating to the capital improvements that CN plans to make to the EJ&E system in the approximate amount of \$100 million, as referenced at page 212 of the Railroad Control Application you filed in this proceeding. This request includes, but is not limited to:

- a. A list of the capital improvements that you plan to undertake that are included in the approximately \$100 million of capital improvements;
- b. The schedule or timetable for the projects that you plan to undertake that are included in the approximately \$100 million of capital improvements; and
- c. Documents reflecting the details of any capital improvement included in the planned capital improvements.

11. Any analysis you prepared of the increased maintenance or maintenance costs required for EJ&E track in Will County due to increased traffic in the event the Railroad Control Application is approved, both in the initial years and after the acquisition is fully implemented.

12. All documents reflecting, referring or relating to any analysis of the operating plan or possible operational difficulties associated with the switching of local traffic onto the EJ&E main tract in Will County in the event the Railroad Control Application is approved, both in the initial years and after the acquisition is fully implemented.

13. All documents reflecting, referring or relating to any analysis of the frequency or duration of the possible or likely blockage of automobile and truck traffic at the at grade crossings in Will County in the event that the Railroad Control Application is approved, both in the initial years and after the acquisition is fully implemented.

14. All documents reflecting, referring or relating to any analysis of the proposed transaction on the regional or local transportation system.
15. All documents reflecting, referring or relating to any analysis of:
 - a. Any increase in the noise levels in any area of Will County due to the projected increase in train traffic due to the proposed transaction; or
 - b. The identity of any sensitive noise receptors in Will County that could be impacted by increased noise due to the proposed transaction.
16. All documents reflecting, referring or relating to any analysis of:
 - a. Any increase in the vibration levels in any area of Will County due to the projected increase in train traffic due to the proposed transaction; or
 - b. The identity of any sensitive vibration receptors in Will County that could be impacted by increased noise due to the proposed transaction.
17. All documents reflecting, referring or relating to any analysis of increased vehicle delay times at railroad grade crossings in Will County due to the proposed transaction.
18. All documents reflecting, referring or relating to any analysis of the impact of the proposed transaction on the provision of emergency services in Will County.
19. All documents reflecting, referring or relating to any analysis of the improved safety measures that could be required at any at grade rail crossing in Will County due to the increased traffic associated with proposed transaction. This request includes, but is not limited to:
 - a. Any analysis of the safety of the existing safety measures in place at a given crossing;
 - b. Any analysis of the type of safety measures or equipment that could or should be implemented or installed at a Will County crossing to address the safety issues posed by the increased train traffic associated with the proposed transaction;
 - c. Any analysis of the cost of safety measures or equipment that could or should be implemented or installed at a Will County

crossing to address the safety issues posed by the increased train traffic associated with the proposed transaction; and

- d. Any analysis of the likely responsibility for or participation in the cost of safety measures at a crossing in Will County that could or likely would be required to address the safety issues posed by the increased train traffic associated with the proposed transaction.

20. All documents reflecting, referring or relating to your plans to protect public safety from the risks associated with the project increase in hazardous materials transported on EJ&E track through Will County if the proposed transaction is approved.

21. All documents reflecting, referring or relating to the budget or budgets for environmental mitigation that may be required if the proposed transaction is approved.

22. All documents reflecting, referring or relating to your analysis of the likely growth in traffic on the EJ&E tracks in Will County assuming the proposed transaction is approved, both in the initial years and after it is fully implemented.

23. All documents reflecting, referring or relating to any analysis of the impact on air quality in Will County if the proposed transaction is approved.

Respectfully submitted,
WILL COUNTY, ILLINOIS

By: Edward R. Gower

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Dated: January 3, 2008

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he has caused a true and correct copy of the foregoing document(s) to be served upon:

COUNSEL FOR CANADIAN NATIONAL RAILWAY COMPANY, GRAND TRUNK CORPORATION AND EJ&E RAILWAY COMPANY

by UPS Overnight Delivery at the below listed addresses as recorded with the Surface Transportation Board and listed below:

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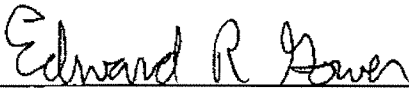
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ALL REMAINING PARTIES OF RECORD AS OF THIS DATE

SEE ATTACHED SERVICE LIST

by mailing a true and correct copy thereof from the law office of Hinshaw & Culbertson LLP, 400 South Ninth Street, Suite 200, Springfield, Illinois, 62701, to the persons named on the Surface Transportation Board's service list as of this date, January 3, 2008.


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Docket #: FD_35087_0

**CANADIAN NATIONAL RAILWAY COMPANY AND GRAND TRUNK
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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 35087

**CANADIAN NATIONAL RAILWAY COMPANY AND
GRAND TRUNK CORPORATION**

-CONTROL-

EJ&E WEST COMPANY

WILL COUNTY'S FIRST SET OF INTERROGATORIES

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January 3, 2008

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

FINANCE DOCKET NO. 35087

**CANADIAN NATIONAL RAILWAY COMPANY AND
GRAND TRUNK CORPORATION**

-CONTROL-

EJ&E WEST COMPANY

WILL COUNTY'S FIRST SET OF INTERROGATORIES

Pursuant to 49 C.F.R. §1114.26, Will County, Illinois ("Will County") directs the following interrogatories upon Canadian National Railway Company, Grand Trunk Corporation, Elgin, Joliet and Eastern Railway Company, and EJ&E West Company. Will County requests that responses should be served as soon as possible, and in no event later than 15 days from the date of service hereof. Counsel for respondents should contact the undersigned promptly to discuss any objections or questions regarding these requests with a view to resolving any disputes or issues of interpretation informally and expeditiously. Will County will pay all reasonable costs for duplication and delivery of any responsive documents to counsel for the responding party.

DEFINITIONS

- a. "You" and "your" mean and refer to Canadian National Railway Company, Grand Trunk Company, Elgin, Joliet and Eastern Railway Company, and EJ&E West Company, as collective or individual respondents to the request for production of documents.
- b. "EJ&E" means the Elgin, Joliet and Eastern Railway Company.

- c. "At grade crossing" means a crossing in Will County, Illinois involving EJ&E track and pedestrian, bicycle or vehicular traffic.

INTERROGATORIES

INTERROGATORY NO. 1: Assuming that the proposed transaction is approved and fully implemented, for every at grade crossing in Will County please provide the following information:

- a. The average number of trains that you project will cross that crossing on a daily basis;
- b. The length of each train that you project will cross that crossing on a daily basis. If you have an average, please provide that average;
- c. The average speed of each such train; and
- d. The length of time that you project that the crossing will be blocked to automobile traffic due to the passage through the crossing of each such train. If you only have an average, please provide that average.

ANSWER:

INTERROGATORY NO. 2: Please describe the safety equipment and measures that are in place at each at grade crossing in Will County. Your answer should include, but need not be limited to, a description of the safety equipment in place and the existing track circuitry that triggers any safety warning devices, such as bells, gates or flashing lights.

ANSWER:

INTERROGATORY NO. 3: In the next five years, do you have any plans to improve the safety equipment or measures that are in place at any at grade crossing in Will County? If so, please identify the crossing and describe the proposed improvement and any cost sharing agreement or plan for paying for that improvement.

ANSWER:

INTERROGATORY NO. 4: Do you believe that the existing safety measures and equipment at each at grade crossing in Will County is adequate to protect the public safety if the proposed transaction is approved and is fully implemented? If your answer is no, please:

- a. Identify the at grade crossing where you believe the existing safety equipment and measures will be inadequate to protect the public safety after the transaction is approved and fully implemented.
- b. For each at grade crossing identified in response to 4.a., above, please describe the safety measures or equipment that you believe will be required in order to adequately protect the public safety at that crossing; and
- c. State how you believe the costs of any necessary safety improvements should be allocated.

ANSWER:

INTERROGATORY NO. 5: In the next five years, do you have any plans to seek the closure of any at grade crossing in Will county? If so, please identify the crossing; state the grounds that you believe support closure; and the time frame within which you intend to seek closure.

ANSWER:

INTERROGATORY NO. 6: Identify the individual employee or agent of each respondent most knowledgeable about any of the following subjects with respect to the EJ&E tracks in Will County if the proposed transaction is approved and consummated:

- a. Train Operations;

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he has caused a true and correct copy of the foregoing document(s) to be served upon:

COUNSEL FOR CANADIAN NATIONAL RAILWAY COMPANY, GRAND TRUNK CORPORATION AND EJ&E RAILWAY COMPANY

by UPS Overnight Delivery at the below listed addresses as recorded with the Surface Transportation Board and listed below:

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ALL REMAINING PARTIES OF RECORD AS OF THIS DATE

SEE ATTACHED SERVICE LIST

by mailing a true and correct copy thereof from the law office of Hinshaw & Culbertson LLP, 400 South Ninth Street, Suite 200, Springfield, Illinois, 62701, to the persons named on the Surface Transportation Board's service list as of this date, January 3, 2008.



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