

Before The
SURFACE TRANSPORTATION BOARD

Finance Docket No. 35087

**Canadian National Railway Company and Grand Trunk Corporation-Control-EJ&E West
Company**

Comments of the National Association of Railroad Passengers

Summary of party's concerns regarding the transaction—

The Canadian National Railroad (CN) proposes to abandon the St. Charles Air Line in conjunction with its acquisition of the Elgin, Joliet, and Eastern Railroad. The Air Line is vital to Amtrak operations and will remain so until a connection is built at “Grand Crossing” which enables trains approaching Chicago from Champaign, Carbondale, Memphis, New Orleans, and intermediate points, to leave the Canadian National mainline and use the Norfolk Southern line already used by Amtrak’s Chicago-Michigan corridor services and most Chicago-East Coast Amtrak trains.

While the Grand Crossing connection would permit an improvement in Amtrak service, any other conceivable alternate route to the Air Line would seriously worsen the service, adding potentially as much as an hour to trip times. Therefore, NARP strongly urges that—if the CN proposal is approved—such approval be conditioned on CN permitting Amtrak to continue using the existing line at no additional expense until the Grand Crossing connection is built and ready for service.

If CN’s proposal is approved without this condition, the result likely would be the end of passenger rail service between Chicago, Champaign, Carbondale, Memphis and New Orleans, destroying both an effective, state-supported corridor service within Illinois as well as a vital national system route serving multiple states.

Background—

Passenger rail service has been provided over the current Canadian National Chicago-New Orleans mainline since Amtrak’s start-up on May 1, 1971, and prior to that by the Illinois Central Railroad and other carriers. Prior to inception of Amtrak and for the first ten months of Amtrak’s existence, most passenger trains utilizing the Illinois Central mainline served Chicago’s Central Station. On March 5, 1972, Amtrak consolidated all of its Chicago operations at Union Station. Trains utilizing the Illinois Central mainline were accommodated on the St. Charles Air Line, an elevated rail line that connected the Illinois Central to the Burlington Railroad mainline at a point approximately 1 ½ mile south and west of Union Station.

By nature of its grade-separated right of way (save for one at-grade railroad crossing with the Rock Island Railroad, now Metra, passenger mainline at 16th Street), the St. Charles Air Line was and continues to be the only viable, intact (not abandoned) routing for passenger trains to reach Union Station from the Canadian National mainline. Other alternative routes, including

the EJ&E mainline, are far more circuitous and also involve many at-grade crossings with other freight railroads.

Passenger rail service on the CN mainline at present consists of two State of Illinois-supported corridor trains operating between Chicago Union Station and Carbondale, IL and Amtrak's *City of New Orleans* operating between Chicago Union Station and New Orleans, LA.

Growing ridership—

The Chicago-Carbondale service has thrived since introduction of a second corridor frequency by the State of Illinois in October 2006. The traveling public responded immediately. Ridership in November 2006 versus November 2005 was up 61.23%. Fiscal year numbers are even stronger: Fiscal 2007 ridership was up 67.37% over Fiscal 2006. The *City of New Orleans*' ridership is also up. This strong increase in ridership would be in severe jeopardy if the St. Charles Air Line would be abandoned without consideration of an alternative route. Fortunately, there is such a solution.

Grand Crossing, the key to preservation of passenger rail service—

There is another potential route for passenger trains from the Canadian National mainline to Union Station. An abandoned right of way exists near 75th St. and South Chicago Ave. in Chicago that connects the Canadian National mainline to the Norfolk Southern Chicago-Cleveland mainline. This so-called "Grand Crossing Connection" was used prior to Amtrak, mainly to bring Nickel Plate Road passenger trains operating to and from Buffalo into Chicago's LaSalle Street Station. The right of way is preserved and intact.

If the connection is rebuilt and infrastructure improvements made on Norfolk Southern's mainline, this would be not only an acceptable alternative to the St. Charles Air Line, but in fact an improvement in passenger rail service to Southern Illinois, with trip times reduced by at least 10 minutes.

Conclusion—

NARP strongly opposes abandonment of the St. Charles Air Line without proper accommodation for passenger rail service. If the acquisition is to be approved, it should be conditioned on passenger rail service on the Canadian National mainline having convenient, reliable access to Chicago Union Station—either by continued use of the St. Charles Air Line or construction of a connection at Grand Crossing.

Thank you for your consideration of our comments.



Ross B. Capon, Executive Director
National Association of Railroad Passengers, 900 Second Street, NE, Suite 308,
Washington, DC 20002 202-408-8362 www.narprail.org

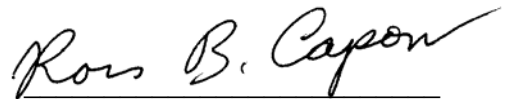
Before The
SURFACE TRANSPORTATION BOARD

Finance Docket No. 35087

**Canadian National Railway Company and Grand Trunk Corporation-Control-
EJ&E West Company**

Certificate of Service

I hereby certify I have served a copy of my Comments regarding the above-referenced proceedings, on behalf of the National Association of Railroad Passengers, dated January 25, 2008, upon all parties of record designated on the service list late release January 25, 2008, in accordance with the indicated sentence in the second paragraph of Decision No. 3, by first class mail postage-prepaid.



Ross B. Capon
Executive Director
National Association of Railroad Passengers
900 Second Street, NE, Suite 308
Washington, DC 20002

Dated at
Washington, DC
January 28, 2008

Cunningham, Paul A.
Harkins Cunningham Llp
1700 K Street, N.W., Suite 400
Washington, DC 20006-3817

Elliott III, Daniel R
United Transportation Union
14600 Detroit Avenue
Cleveland, OH 44107-4250

Sheys, Kevin M.
Kirkpatrick & Lockhart Preston Gates Ellis Llp
1601 K Street, N.W.
Washington, DC 20006

Visclosky, Honorable Peter J.
U.S. House Of Representatives
701 East 83rd Avenue, Suite 9
Merrillville, IN 46410-6239

Rosenthal, Michael L
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Washington, DC 20004-2401

Mcfarland, Thomas F
Thomas F. Mcfarland, P.C.
208 South Lasalle St Suite 1890
Chicago, IL 60604

Mullins, William A
Baker & Miller Pllc
2401 Pennsylvania Ave, Nw-Suite 300
Washington, DC 20037

Dobosz, Stanley
Town Of Griffith
111 N. Broad St.
Griffith, IN 46319-2294

Sheehy, Timothy R
Metropolitan Milwaukee Association Of Commerce
756 North Milwaukee Street
Milwaukee, WI 53202

Anderson, Thomas R
Save The Dunes Council
444 Barker Road
Michigan City, IN 46360

Dodds, Katherine
Aux Sable Liquid Products, Inc.
6155 East Us Route 6
Morris, IL 60450

Sidman, Mark H
Weiner Brodsky Sidman & Kider P C
1300 19Th Street Nw 5Th Floor
Washington, DC 20036-1609

Brown, Timothy A.
Town Of Merrillville
7820 Broadway
Merrillville, IN 46410

Steel Jr, Adrian L
Mayer Bown LLP
1909 K Street NW
Washington, DC 20006

Bean, The Honorable Melissa
U.S. House Of Representatives
512 Cannon House Office Building
Washington, DC 20115

Reitemeier, Joseph R
207 North Main Street
Fond Du Lac, WI 54935

McCrory, Donald C
International Port Of Memphis
1115 Riverside Blvd.
Memphis, TN 38106-2504

Serpe, Roger A
Indiana Harbor Belt Railroad Company
150 North Wacker Drive, Suite 1500
Chicago, IL 60606-1606

Ross, Harold A.
Brotherhood Of Locomotive Engineers And Trainmen

1370 Ontario Street, Mezzanine
Cleveland, OH 44113

Wolly, Michael S
Zwerdling Paul Leibig Kahn & Wolly
1025 Connecticut Ave Nw Suite 712
Washington, DC 20036

Lisak, Andrew
The Development Association
1401 Tower Ave., Suite 302
Superior, WI 54880

Sanders, Timothy J.
Northwest Indiana Regional Development Authority
9800 Connecticut Drive
Crown Point, IN 46307

Degiulio, Thomas F
Town Of Munster
1005 Ridge Road
Munster, IN 46321

Honorable John D. Dingell
U.S. House Of Representatives
Washington, DC 20515-2216

Volmer, Neil
Iowa Department Of Transportation
800 Lincoln Way
Ames, IA 50010

Casper, John A.
120 Jackson Street
Oshkosh, WI 54901

Mayo Jr, George W
Hogan & Hartson L L P
555 Thirteenth Street Nw, Columbia Square
Washington, DC 20004-1109

Paesel, Edward W.
South Suburban Mayors And Managers Association
1904 W. 174Th Street
East Hazel Crest, IL 60429

Hayes, Paul
Town Of Dyer
One Town Square
Dyer, IN 46311

Guthrie, Paul
Canadian Pacific Railway
Suite 500 Gulf Canada Square 401 -9Th Avenue Sw
Calgary, AB T2P 4Z4

Olson, David C
Minnesota Chamber Of Commerce
400 Robert Street North, Suite 1500
St. Paul, MN 55101

Smith, Paul Samuel
U.S. Department Of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Matrisch, Steven L.
State Illinois Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Quigley, Steven
Will County Governmental League
50 East Jefferson Street, Suite 101
Joliet, IL 6032-4298

Browning, Karl B
Indiana Department Of Transportation
100 North Senate Avenue, Room N758
Indianapolis, IN 46204-2216

Shudtz, Peter J
Csx Corporation
500 Water Street
Jacksonville, FL 32202

Heffner, Pllc, John D.
Law Offices
1750 K Street, N.W., Suite 350
Washington, DC 20006

Lugar, The Honorable Richard G
United States Senate
306 Hart Senate Office Building
Washington, DC 20510-1401

Tolomei, John G.
Village Of Lake Zurich
70 E. Main Street
Lake Zurich, IL 60047

Jessen, Randall W.
Village Of Plainfield
24401W. Lockport Street
Plainfield, IL 60544

Hirschhorn, Eric L
Winston & Strawn Llp
1700 K Street Nw
Washington, DC 20006-3817

Krause, Honorable Carolyn H.
State Representative - 66Th District
200 E. Evergreen, Suite 122
Mt. Prospect, IL 60056

Link, Honorable Terry
Illinois State Senate
122 State Capitol Building
Springfield, IL 62706

Jackson, Jr., Honorable Jesse L.
U.S. House Of Representatives
2419 Rayburn House Office Building
Washington, DC 20515-1302

Baldermann, Timothy A.
Village Of New Lenox
1 Veterans Parkway
New Lenox, IL 60451

Anderson, Alan
Southern Wayne County Regional Chamber
20600 Eureka Road, Suite 315
Taylor, MI 48180

Macdougall, Gordon P
1025 Connecticut Avenue, Nw, Suite 919
Washington, DC 20036-5444

Roper, Gerald J
Chicagoland Chamber Of Commerce
200 E Randolph Street Suite 2200
Chicago, IL 60601

Clary, Joseph P.
Illinois Department Of Transportation
300 West Adams Street, 2Nd Floor
Chicago, IL 60606

Sobotik, John J
Office Of General Counsel
P. O. BOX 7910
Madison, WI 53707-7910

Lyp, Patrick
Blachly, Tabor, Bozik & Haartman, Llc
56 South Washington, Suite 401
Valparaiso, IN 46383

Tomasoski, John D
City Of Crest Hill
1610 Plainfield Rd Crest Hill
Crest Hill, IL 60403

Lobaito, John A.
Village Of Mundelein
440 East Hawley Street
Mundelein, IL 60060

Dowd, Kelvin J
Slover & Loftus
1224 Seventeenth Street Nw
Washington, DC 20036-3003

Phipps, Eileen
Village Of Wayne
P. O. Box 532
Wayne, IL 60184

Werner, Joseph W.
Village Of Mokena

11004 Carpenter St.
Mokena, IL 60448

Van Poucke, Michael J.
The Macom Corporation
3380 Lacrosse Lane, Suite 100
Naperville, IL 60564

Althoff, Honorable Pamela J.
One North Virginia Street
Crystal Lake, IL 60014

Greene, Richard
Naperville Area Chamber Of Commerce
55 South Main Street
Naperville, IL 60540-5381

Knight, Bruce A.
City Of Champaign
102 North Neil Street
Champaign, IL 61820

Mezera, John M
City Of Joliet
150 West Jefferson Street
Joliet, IL 60432

Cline, David
City Of Mattoon, Il
208 North 19Th
Mattoon, IL 61938

Eichelberger, John
Plainfield Fire Protection District
15025 S. Desplaines Street
Plainfield, IL 60544

Moore, Cameron
Champaign County Regional Planning Commission
P. O. Box 17760
Urbana, IL 61803-7760

Romanski, Randy
Department Of Agriculture, Trade And Consumer Protection
P. O. Box 8911
Madison, WI 53708-8911

Schatz, Marcie
City Of Naperville
400 S. Eagle Street
Naperville, IL 60540

Baker, Robert W.
The Village Of Trout Valley
P. O. Box 621
Cary, IL 60013

Adams, Gary D.
Village Of Oswego
113 Main Street
Oswego, IL 60543

Johnston, Morgan B.
Univesity Of Illinois
1501 South Oak Street
Champaign, IL 61820

Geertsma, Meleah
Environmental Law & Policy Center
35 East Wacker Drive, Suite 1300
Chicago, IL 60601

Weis, Laura E
Champaign County Chamber Of Commerce
1817 S. Neil S., Ste. 201
Champaign, IL 61820-7269

Moates, G Paul
Sidley Austin Llp
1501 K Street, N.W.
Washington, DC 20005

Kingma, Hildy L.
Village Of Park Forest, Il
350 Victory Drive
Park Forest, IL 60466

Dimichael, Nicholas J
Thompson Hine Llp
1920 N Street, N.W. Suite 800
Washington, DC 20036

Wichlinski, Thomas And Patricia
1033 N. Broad Street
Griffith, IN 46319

Cole, Brad
City Of Carbondale
P. O. Box 2047
Carbondale, IL 62902-2047

Austgen, David M.
Austgen Kuiper & Associates, Pc
130 North Main Street
Crown Point, IN 46307

Bayh, Honorable Evan
United States Senate
131 Russell Senate Office Building
Washington, DC 20510-1404

Lugar, Honorable Richard
United States Senate
306 Hart Senate Office Building
Washington, DC 20510

Bowden, Jamie
Village Of Channahon
24555 S Navajo Dr
Channahon, IL 60410

Fowler, Mark L
Northwest Municipal Conference
1616 East Golf Road
Des Plains, IL 60016

Mccarthy, Brian
Arcelormittal
One Dearborn Street
Chicag, IL 60603

Yarbrough, Karen A
State Representative 7Th District
2305 W Roosevelt Road
Broadview, IL 60155

Thompson, Craig
Transportation Development Association Of Wisconsin

131 W. Wilson Street, Suite 302
Madison, WI 53703

Hynes, Terence M.
Sidley Austin Llp
1501 K Street Nw
Washington, DC 20005

Schakowsky, The Honorable Janice D.
U.S. House Of Representatives
1027 Longworth House Office Building
Washington, DC 20515

Kotewa, Erik
Champaign County Economic Development Corporation
1817 S. Neil Street
Champaign, IL 61820

Mcdermott, Honorable Thomas
5925 Calumet Avenue
Hammond, IN 46320

Bosco, Steven
Village Of Bartlett
228 S. Main Sreet
Barlett, IL 60103

Blankenhorn, Randall S.
Chicago Metropolitan Agency For Planning
233 South Wacker Drive, Suite 800, Sears Tower
Chicago, IL 60606

Weingartz, Alayne M.
City Of Aurora
44 East Downer Place
Aurora, IL 60507-2067

Montana, Anna
Village Of Schiller Park
9526 West Irving Park Road
Schiller Park, IL 60176-1984

Wojtasiak, Stan
Naperville Township Road District
31 W 331 North Aurora Road
Naperville, IL 60653

Fortner, Honorable Mike
Illinois State Representative
135 Fremont Street
West Chicago, IL 60185

Saviano, Honorable Angelo
House Of Representatives
314 State House
Springfield, IL 62706

Pradel, Mayor A. George
City Of Naperville
P. O. Box 3020
Naperville, IL 60540

Arredia, Mayor Anthony W.
City Of Des Plaines
1420 Miner Sstreet
Des Plaines, IL 60016

Ross, David
Duluth Are Chamber Of Commerce
5 West First Street, Suite 101
Duluth, MN 55802

Nekritz, Honorable Elaine
State Representative
24 South Des Plaines River Rd., Suite 200
Des Plaines, IL 60016

Schillerstrom, Robert J.
County Government Of Dupage
421 N. County Farm Road
Wheaton, IL 60187

Harnish, Richard
Midwest High Speed Rail Association
P. O. Box 805877
Chicago, IL 60680

Gower, Edward R
Hinshaw & Culbertson Llp
400 South Ninth Suite 200
Springfiled, IL 62701

Peterson, Honorable William E.
Illinois State Senate
3050 North Main Street
Buffalo Grove, IL 60089-2727

Knollenberg, Honorable Joe
United States House Of Representatives
Washington, DC 20515

Mccotter, Honorable Thaddeus
Congress Of The United States
House Of Representatives
Washington, DC 20515-2211

Stabenow, Honorable Debbie
United States Senate
United States Senate
Washington, DC 20510

Levin, Honorable Carl
United States Senate
Washington, DC 20510

Plaistow, Joseph J.
L.E. Peabody & Associates, Inc.
1500 Duke Street, Suite 200
Alexandria, VA 22314

Brimm, William H.
Village Of Buffalo Grove
50 Raupp Blvd.
Buffalo Grove, IL 60089-2100

Allison, Michael S.
Village Of Vernon Hills
290 Evergrass Drive
Vernon Hills, IL 60061-2999

Walberg, Tim
U.S. House Of Representatives
Congress of the United States
Washington, DC 20515

Brinegar, Kevin
Indiana Chamber Of Commerce

P. O. Box 44926
Indianapolis, IN 46244-0926

Beaubien, Honorable Mark
State Representative-52Nd District
124-A E. Liberty Street
Wauconda, IL 60084

Henry, Larry W.
143 Walnut Street
Frankfort, IL 60423

Haan, Gerald
2023 Hearth Circle
Lansing, MI 60438-2551

Piriot, R.J.
Wisconsin Manufacturers & Commerce
P. O. Box 352
Madison, WI 53701-0352

Greenberg, Steve
4730 Westbury Drive
Long Grove, IL 60047

Candice S. Miller
Congress Of The United States
House Of Representatives
Washington, DC 20515-2210

Kreunen, Rodney W
Wi Commissioner Of Rr
P O BOX 8968
Madison, WI 53708-8968

Barnhart, Becky
5327 Cedar Drive
Naperville, IL 60564

Shimkus, Honorable John
Congress Of The United States
House Of Representatives
Washington, DC 20515-1319

Tryon, Honorable Michael W.
State Representative 64Th District

1 N. Virginia Street
Crystal Lake, IL 60014

Rita, Honorable Robert A.
Illinois House Of Representatives
4818 W. 137Th St., Ste. 2
Crestwood, IL 60445

Gratton, Maurice
Propane Gass Association Of Canada
800 717Th -7Th Avenue, Sw
Calgary, AK T2P 0Z3

Howes, Catherine Noel
219 Biltomer Dr.
North Barrington, IL 60010

Gohmann, John W
508 Cleveland Avenue North
St Paul, MN 55114-1804

De Graff, Don A
Village Of South Holland
16226 Wausau Avenue
South Holland, IL 60473

Arthur, Jery G
Supply Chain Management Consultant
833 Shoreline Road
Lake Barrington, IL 60010

L. Charles Lukmann, III
Harris Welsh & Lukmann
107 Broadway
Chesterton, IN 46304

Blackmore, Terri
Washtenaw Area Transportation Study
705 North Zeeb Road, 2Nd Floor
Ann Arbor, MI 48103-1560

W. J. Wochner
Kansas City Southern Railway Company
427 West 12Th Street
Kansas City, MO 64121

J Michael Hemmer
Union Pacific Railroad Company
1400 Douglas Street, Stop 1580
Omaha, NE 68179

Curry, Chris
Gary/Chicago International Airport Authority
6001 W Industrial Highway
Gary, IN 46406

Rodney J. Nilsestuen
Wisconsin Department Of Agriculture, Trade And Consumer Protection
P.O. Box 8911
Madison, WI 53708-8911

Luann Hamilton
Chicago Department Of Transportation
30 N. Lasalle Street, Suite 500
Chicago, IL 60602

Garrett, Honorable Susan
129 Capitol Building
Springfield, IL 62706

Warren, Matthew J.
Sidley Austin Llp
1501 K Street, N.W.
Washington, DC 20005

W. James Wochner
Kansas City Southern Railway Company
P.O. Box 219335
Kansas City, MO 64121-9335

Shudtz, Esq, Peter J
Csx Transportation, Inc.
500 Water Street
Jacksonville, FL 32202

John A Vuono
Vuono & Gray
310 Grant Street, Suite 2310
Pittsburgh, PA 15219-2383

The Honorable Donald Manzullo
U.S. House Of Representatives

2228 Rayburn House Office Building
Washington, DC 20515