



2016 MAR -7 AM 11:15
OFFICE OF CHAIRMAN

Chairman Daniel R. Elliott, III

Surface Transportation Board

395 E. Street, S.W.

Washington, DC 20423-000

February 19, 2016

Chairman Elliott,

Speaking for my two partners here at Cleveland Commercial Railroad (Cleveland, Ohio) I would like to share with you our concerns as a small short line about Canadian Pacific's proposal to merger with the Norfolk Southern.

We are dependent on NS for their timely switching, both inbound and outbound, and interchange of our railroad cars. Since the modus operandi for CP appears to be to slash costs to reduce the operating ratio we feel that a small line like ours would be at great risk in such a circumstance. We now have three switches per week and would be sorely pressed to function if this level of service was to be reduced.

While at this juncture we have had no direct experience with CP we understand that they renew their operating agreements with their short lines every two years. Obviously, making capital improvements and/or investments under such a scenario would be problematic. It would be hard to justify such commitments if we were not sure that we would be around to enjoy the long term benefits that would be where our return would be.

It is hard for us to believe that there would truly be benefits for customers, communities and small railroads like ourselves. We are pretty sure that the benefits of the merger would largely benefit a small group of individuals.

We urge you to take our position into consideration,

Respectfully submitted,



William D. Brown

Cleveland Commercial Railroad Company, LLC.

Phone 440.746.0801 • Fax 440.439.2277

29930 Pettibone Road • Glenwillow, Ohio 44139