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February 19, 2016

Chairman Daniel R. Elliott, III
Vice Chairman Deb Miller
Hon. Member Ann D. Begeman
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-000

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OFFICE OF CHAIRMAN

Dear Chairman Elliott and Surface Transportation Board Members:

On behalf of WestRock, I am writing with regard to the proposed acquisition of the Norfolk Southern Corporation (NS) by the Canadian Pacific Railway (CP). We urge careful consideration by the Surface Transportation Board (STB) during its review process to ensure the outcome provides for a customer-focused, service oriented rail partner that's committed to investing in rail infrastructure as well as boxcars and short-line rail partnerships. WestRock is a \$15 billion consumer and corrugated packaging manufacturer that supports customers around the U.S. and globally, with more than 275 locations in 30 countries. We use the services of both rail companies.

Efficient, reliable and cost competitive freight rail service is vitally important to WestRock. Transporting raw materials to our mills and the movement of out-bound products to our customers is essential to our operations. NS and CP Class I freight rail service represent a vital link in ensuring our connectivity to national and international markets. Careful consideration needs to be given to stated intentions related to asset sales and potential reduction in service resulting from a combination of these two rail providers.

As you complete your thoughtful and forward-looking analysis of this potential merger and its long-term effects on the stakeholders of the rail industry, we respectfully submit that the STB should not approve any merger favoring one particular carrier over the greater rail industry and the customers that it serves. The STB's decision-making process should be fundamentally guided by what is best for the customers of the rail industry.

Our company and our customer base rely very heavily on excellent service and reliability. We are concerned that any potential reduction in locomotives, railcars and personnel that provide a high level of service will negatively impact our business; I ask that you keep these thoughts in your minds as you continue to look at any potential changes in the Class 1 field.

Thank you for the opportunity to share my thoughts with you. I again urge your thoughtful review of the proposed CP-NS merger, and I encourage you to put the customer first in your decision-making process.

Sincerely,

William Merrigan
Senior Vice President, Logistics
WestRock