



Charles W Webster  
Senior Counsel – US

11306 Franklin Avenue  
Franklin Park IL 60131  
USA

T 630 860 4161

charles\_webster@cpr.ca

238500

May 29, 2015

Ms. Cynthia T. Brown  
Chief, Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W.  
Washington, DC 20423

ENTERED  
Office of Proceedings  
May 29, 2015  
Part of  
Public Record

Re: STB Docket No. EP 665 (Sub-No. 1) *Rail Transportation of Grain, Rate Regulation Review*

Dear Ms. Brown:

Pursuant to the notice served in this docket on May 8, 2015, Canadian Pacific Railway Company on its own behalf and on behalf of Soo Line Railroad Company, Delaware and Hudson Railway Company, Inc. and the Dakota, Minnesota & Eastern Railroad Corporation (collectively "CP") hereby submits this Notice of Intent to Participate in the hearing scheduled to commence on June 10, 2015.

CP requests that Mr. James Clements, Canadian Pacific Railway Company's Vice President Strategic Planning and Transportation Services, be allowed to speak at the hearing on behalf of CP for 10 minutes. Mr. Clements will address whether the Board should consider revenues and costs of CP's full system, US and Canada, operations when determining revenue adequacy in rate reasonableness challenges of grain shipments.

Mr. Clements will explain differences in US and Canadian rail regulatory and economic environments, flaws inherent in the inclusion of financial data from Canadian rail carriers in determining revenue adequacy, and why any concern that a carrier could use the revenue and cost process to manipulate the Board's revenue adequacy determination is unwarranted.

Mr. Clements will be accompanied by counsel.

Respectfully submitted,

Charles W. Webster  
Counsel for Canadian Pacific