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December 17, 2012

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

233551



**RE: STB Docket No. EP714, Information Required in Notices and Petitions Containing Interchange Commitments.**

Dear Ms. Brown:

I am the General Manager of Minn-Kota Ag Products located in Breckenridge, Minnesota. We ship our product on our local short line railroad, the Red River Valley & Western. Our facility has been located on this line since it was created in 1987 and I have been with the company since 1989.

I am informed that the Surface Transportation Board (STB) is considering new rules that would make it difficult for a short line railroad to purchase track from a Class I if the seller requires that it receive the traffic at its interchange. I believe such a rule will do more harm than good and I would ask you to keep two things in mind

The Red River Valley and Western agreed to an interchange commitment as part of its transaction with the BNSF. It is my understanding that the sale would not have been possible without this provision. A rule such as you are contemplating would not have helped my business. At best BNSF would have refused to sell the line in which case I would have the same single Class I connection I have today. At worst BNSF would have continued to reduce service and perhaps ultimately abandoned the line.

Even with the requirement that my carloads eventually end up on BNSF, I am much better off with my short line service. It is a local railroad that has more flexible service and it is competitively priced. Since I began with the company in 1989 we have doubled our carloads to 4,000 carloads per year. The interchange commitment has not hindered that growth.

The ability of short line railroads to step in and serve rural areas of the country that cannot be efficiently served by the large national railroads has been enormously important to businesses such as mine. It is not in our best interest to make the creation of short line railroads more difficult. I believe that is what this proposed rule does and I hope you will not let it go forward

Sincerely,  
*Brian Arnhalt*  
Brian Arnhalt  
General Manager

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Public Record