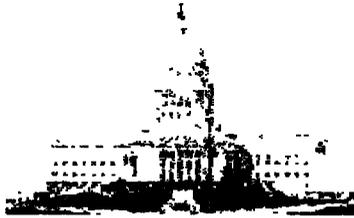


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The Wisconsin State Legislature

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December 29, 2011

Ms. Cynthia T. Brown, Chief  
Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street S.W.  
Washington, DC 20024

Re: Docket No. FD 35573, Watco Holdings, Inc. and Watco Transportation Services, LLC Acquisition of Control - Wisconsin & Southern Railroad, LLC

Dear Ms. Brown:

Please refer to the Board's procedural notice in the above proceeding bearing service date of December 15, 2011. This letter is to respectfully request a 60-day delay of the December 29, 2011 effective date of WATCO's acquisition of control of Wisconsin & Southern Railroad, LLC (WSOR).

The requested delay is justified in order to provide representatives of the State of Wisconsin with an adequate opportunity to investigate the effects of loss of WSOR's independence. Accelerated notice of exemption procedure is not appropriate for consideration of the effect of control of a rail carrier, such as WSOR, that has important regional significance. Wisconsin rail shippers experienced severe adverse effects when control of another rail carrier of regional significance, Wisconsin Central, Ltd., was acquired by Canadian National Railway Company several years ago.

On behalf of Wisconsin's rail shippers, the State of Wisconsin should be provided with a reasonable opportunity to investigate whether Wisconsin shippers who rely on WSOR rail service might experience similar adverse effects under WATCO control. Accelerated notice of exemption procedure does not provide that needed opportunity.

The requested delay is in the nature of a request for a housekeeping stay for 60 days to enable adequate State investigation of the proposed control. The short delay in consummation of the control is justified by the need for more reasoned consideration of a transaction of important regional significance.

WHEREFORE, the December 29, 2011 effective date of the proposed control should be extended for 60 days.

Thank you for your consideration.

Respectfully submitted,

Rep. Brett Hulsey, Madison  
Rep. Louis Molepske, Stevens Point  
Rep. Kelda Helen Roys, Madison  
Rep. Fred Clark, Baraboo  
Rep. Terese Berceau, Madison