



7840 Graphics Drive Suite 100 Tinley Park, Illinois 60477

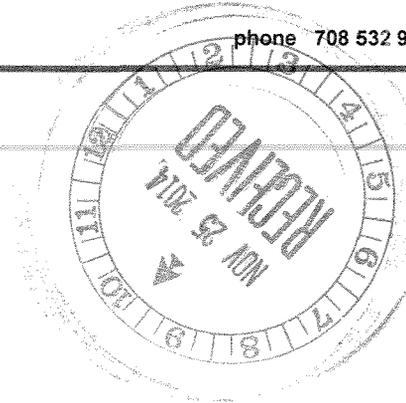
phone 708 532 9200 fax 708 532 4542

STEVEN M. GOLICH
PRESIDENT

237146

November 18, 2014

Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423



ENTERED
Office of Proceedings
November 25, 2014
Part of
Public Record

RE: Finance Docket No. FD35873, *Norfolk Southern Railway Company – Acquisition and Operation – Certain Rail Lines of The Delaware and Hudson Railway*

Dear Honorable Commissioners:

Celtic International, Inc. submits this letter in strong support of the application filed on November 18, 2014 of Norfolk Southern Railway Company (“NS”) to acquire and operate certain rail lines of The Delaware and Hudson Railway (“D&H”).

Celtic International, Inc. is a major Intermodal Marketing Company that depends on reliable and sustainable service over Norfolk Southern’s routes over the D&H South Lines. Our company ships Intermodal containers from Pennsylvania origins to new York destinations via Norfolk Southern over the D&H.

Celtic International, Inc. supports the proposed acquisition because it:

- Substitutes a stronger NS for a disinterested D&H, which should ensure the continued viability of the D&H South Lines
- Aligns ownership with usage, which creates operating efficiencies that should improve the reliability and sustainability of service on the lines.
- Directly connects NS with its PanAm Southern facilities, which should result in more efficient service and competitive transportation options]
- Results in minimal disruption of service, since NS already operates daily over the lines
- Produces no competitive harms, as it is essentially an end-to-end transaction
- Enhances overall competition in the Northeast surface transportation market

For the above reasons, Celtic International Inc. strongly supports the application of NS before the STB to acquire and operate certain rail lines of D&H. We respectfully request your expedited review and approval of this minor transaction.

Sincerely,

Steven M. Golich
President

cc: Mark Boge Norfolk & Southern Railway