



**National Grain
and Feed Association**

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April 8, 2016

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VIA E-FILING

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
April 8, 2016
Part of
Public Record

**Re: STB Docket FD 36004, *Canadian Pacific Railway Limited –
Petition for Expedited Declaratory Order***

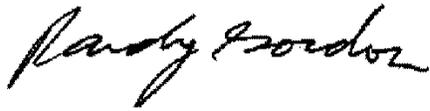
Dear Ms. Brown:

This letter is provided to inform the Surface Transportation Board (“Board”) that the six national agricultural producer and agribusiness organizations, as well as the eight State and Regional Agribusiness Associations affiliated with the National Grain and Feed Association (“NGFA”),¹ listed below, have notified the NGFA that they support the NGFA’s Reply to the Petition for Expedited Declaratory Order (“Petition”) filed in this docket by Canadian Pacific Railway Limited (“CPRL”)

These parties have authorized NGFA to state to the Board that they concur with the NGFA that the Board should deny the CPRL Petition and defer ruling on any aspects of a potential voting trust agreement based solely upon the hypotheticals presented by CPRL unless and until an actual, definitive voting trust proposal is presented by CPRL to the Board for its formal approval pursuant to 49 CFR 1180.4(b)(4)(iv).

¹ The identity and descriptions of each organization are summarized in Exhibit 1,

Respectfully submitted,



Randall C. Gordon
President
National Grain and Feed Association

Exhibit 1

National Producer and Agribusiness Organizations:

Agricultural Retailers Association

American Farm Bureau Federation

Corn Refiners Association

National Association of Wheat Growers

National Farmers Union

National Oilseed Processors Association

Agricultural Retailers Association is a national non-profit trade organization for agricultural retailers and distributors of agronomic crop inputs with members covering virtually all of the 50 states and representing over 70 percent of all crop input materials sold to America's farmers. These inputs are used to nourish and protect a wide variety of crops, from major row crop commodities to specialty crops. Members not only sell agronomic crop inputs but actually apply with their own equipment basic crop nutrients and crop protection products; over half of ARA's members custom apply fertilizer for their customers on about 45 percent of their total acres served. ARA membership is diverse, from small family-run businesses of 10 employees to farmer cooperatives with one thousand or more employees and large corporations with thousands of employees and multiple branches. Suppliers of the products sold by retailers are also members of the association.

American Farm Bureau Federation is the nation's largest general farm organization, representing more than 6 million member families and growers of virtually every commodity.

Corn Refiners Association, established in 1913, is the national trade association representing the U.S. corn refining industry. Corn refiners manufacture sweeteners, ethanol, starch, bioproducts, corn oil and feed products from corn components such as starch, oil, protein and fiber.

National Association of Wheat Growers (NAWG) is a federation of 22 state wheat grower associations that works to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and grower-funded, and works in areas as diverse as federal farm policy, transportation, trade, environmental regulation, agricultural research and sustainability.

National Farmers Union has been working since 1902 to protect and enhance the economic well-being and quality of life for family farmers, ranchers and rural communities through advocating grassroots-driven policy positions adopted by its membership.

National Oilseed Processors Association, established in 1929, assists the U.S. soybean, canola, flaxseed, sunflower seed and safflower seed processing industries to be the most competitive and efficient in the world by utilizing the combined expertise, knowledge and resources of its members to foster market- and science-based policies. NOPA represents 13 member companies who process over 1.6 billion bushels of oilseeds annually at 63 plants in 19 states.

State and Regional Associations Affiliated with NGFA:

Agribusiness Association of Iowa

California Grain and Feed Association

Grain and Feed Association of Illinois

Kansas Grain and Feed Association

Michigan Agribusiness Association

Nebraska Grain and Feed Association

Northeast Agribusiness and Feed Alliance

South Dakota Grain and Feed Association

Agribusiness Association of Iowa exists for the purpose of advocating, communicating and educating on behalf of a proactive, profitable, and environmentally responsible professional agribusiness industry. AAI's membership consists of over 1,100 business locations across the state of Iowa that supply feed, seed, crop protection chemicals, grain, fertilizer, equipment and additional products and services that benefit agriculture, as a whole.

California Grain and Feed Association, established in 1924, is the nonprofit agricultural trade association that provides government representation, information, education, environmental and safety consultation and other services to the state's grain and feed industry.

Grain and Feed Association of Illinois is the state-wide trade association for the grain and feed industry in Illinois that provides government relations, education and information for and on behalf of its member companies. The Association represents an industry with *more than \$13 billion in annual sales*. More than 90 percent of the commercial grain storage space in the State of Illinois is represented by members of the Grain and Feed Association of Illinois. Its members range in size from multinational organizations to small, single facility operations. Its membership consists of approximately 187 companies consists of country and terminal grain elevators, grain brokers, feed dealers, feed manufacturers, truckers, ethanol plants, and both corn and soybean processors. The industry directly employs just over 5,000 people. In addition the Association has over 165 members allied to the grain and feed industry. They include banks, construction companies, futures brokers, accounting firms, insurance companies, equipment suppliers and others. This results in approximately 4,900 additional people indirectly employed by the grain and feed industry in Illinois.

Kansas Grain and Feed Association is a 118-year-old trade association representing 98 percent of all commercially licensed grain storage capacity in Kansas. Its members own and operate nearly 1,000 grain storage and handling locations across the state.

Michigan Agribusiness Association, with roots dating to 1903, represents businesses that form the backbone of Michigan's agriculture sector – the second largest industry in Michigan, which employs more than 1 million people across the state and generates more than \$71 billion for its economy. MABA's diverse membership includes companies in the grain, fertilizer, crop protection, feed, transportation, milling and dry bean sectors. MABA members also include companies that process and sell food and food products, supply goods and provide services to every corner of the agriculture industry.

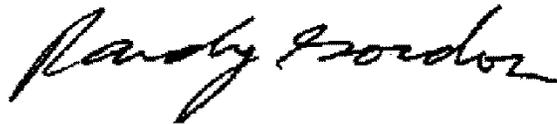
Nebraska Grain and Feed Association, organized in 1896, was formed to promote the common business interests of the grain and feed industry; to seek and obtain improvement of business conditions of the grain and feed trade; to acquire and disseminate information to facilitate the proper conduct of business in the grain and feed trade; and to promote the general welfare of the association and its members.

Northeast Agribusiness and Feed Alliance is a member organization of agribusiness companies serving the agriculture industry throughout the Northeast. Our primary goals focus on advocacy, education and collaboration for the betterment of our industry.

South Dakota Grain and Feed Association is a statewide, non-profit trade association composed of grain elevator firms and other agribusinesses involved in the grain, feed and farm supply business.

Certificate of Service

I hereby certify that on this 8th day of April, 2016 copies of the foregoing Letter of the National Grain and Feed Association have been served on all parties of record in STB Docket FD 36004 by first class mail.

A handwritten signature in black ink, reading "Randy Gordon". The signature is written in a cursive, slightly slanted style.

Randall C. Gordon