

**CONRAIL®**



February 20, 2007

VIA UPS Overnight

Vernon A. Williams, Secretary  
Surface Transportation Board  
1925 K Street, N.W.  
Washington, D.C. 20423-0001

Re: STB Finance Docket No. 34986 *218674*  
Ashland Railroad, Inc. – Verified Notice of Exemption –  
Notice of Lease and Operation of Rail Line  
Freehold, Monmouth County, New Jersey

STB Finance Docket No. 34987 *218675*  
G. David Crane - Continuance in Control Exemption – **ENTERED**  
Ashland Railway, Inc. – Verified Notice of Exemption **Office of Proceedings**  
**FEB 21 2007**

Part of  
Public Record

Dear Mr. Williams:

Consolidated Rail Corporation (“Conrail”) hereby submits the following comments regarding the above-referenced Notices of Exemption (“NOE”) filed by Ashland Railroad, Inc. (“ASRR”) (the “Ashland NOE”) and G. David Crane (the “Crane NOE”) on January 30, 2007. On page four of the Ashland NOE, ASRR states that the “operation of ‘the Line’ and appurtenant transportation facilities will enable facility tenants and other shippers to receive inbound and originate outbound freight shipments from and to points throughout the United States and Canada via Consolidated Rail Corporation (Conrail) who will interchange traffic with ARC on behalf of both Norfolk Southern Railroad Company (NS) and CSX Transportation Company (CSX) at Freehold, N.J. ARC will maintain and operate ‘the Line’ provide switching and related rail services to facility tenants that utilize the terminal facilities, and effect the interchange and delivery of inbound and the origination and interchange of outbound line-haul rail shipments with NS and CSX via Conrail.”

Similarly, on page two of the Crane NOE, Crane states that “Crane has created a new company, the Ashland Railroad, Inc. (a New Jersey Corporation) which has filed a Notice of Exemption to operate trackage in the Township of Freehold, Monmouth County, New Jersey which will interchange with Consolidated Rail Corporation at Freehold on behalf of CSX Transportation Company and Norfolk Southern Railroad.”

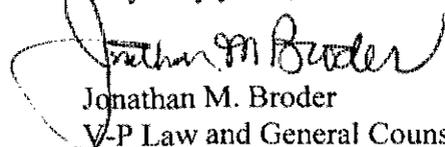
Please be advised that to date Conrail has no agreement with ASRR or Crane to provide interchange service as stated in the NOEs. In fact, Conrail has not had conversations of any kind with ASRR or Crane regarding matters that are the subject of these NOEs.

Conrail requests that it be made a party of interest in these dockets.

Please time stamp the enclosed extra copy of this letter and return it to me in the enclosed self-addressed stamped envelope.

Should you have any questions, please contact the undersigned. Thank you for your consideration in this matter.

Very truly yours,



Jonathan M. Broder  
V-P Law and General Counsel  
Conrail  
2001 Market Street, 8<sup>th</sup> Floor  
Philadelphia, PA 19103  
(215) 209-5020

cc: J. K. Fiorilla