

September 20, 2007

The Honorable Vernon A. Williams
Surface Transportation Board
395 E Street, S.W.
Suite 1260
Washington, D.C. 20423-0001

RE: STB Finance Docket No. 35063; *Michigan Central Railway, LLC- Acquisition and Operation Exemption- Lines of Norfolk Southern Railway Company*

Dear Secretary Williams:

On September 18th, we filed comments for Martin Marietta Magnesia Specialties and omitted the certificate of service. Please find attached a copy of the comments and the certificate of service.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



Jeffrey O. Moreno

Martin Marietta Magnesia Specialties



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September 16, 2007

Mr. Vernon A. Williams
Secretary
Surface Transportation Board
395 E. Street S.W.
Washington, DC 20423-0001

Regarding:
STB Finance Docket No. 35063
Michigan Central Railway, LLC
Acquisition and operation exemption
Lines of Norfolk Southern Railway Company

Dear Secretary Williams:

The purpose of this letter is to comment on the above referenced matter. Martin Marietta does not oppose the transaction provided the Board imposes certain conditions to preserve the existing situation for traffic destined for or originating at Martin Marietta's Manistee, MI plant.

Martin Marietta is a publicly traded company headquartered in Raleigh, North Carolina. It processes minerals and aggregates at facilities throughout the United States and is a significant user of rail services. Martin Marietta's sole manufacturing facility for the production of magnesium hydroxides and magnesium oxides is located in Manistee, MI. The facility receives 2,000 cars per year of raw materials and ships approximately 2,000 more cars of a variety of products to customers and terminals throughout North America. The Manistee facility is served by the Marquette Railroad (MQT)

Martin Marietta's current ability to be competitively served through Norfolk Southern Railway (NSR) is already hampered by the required CSX Transportation, INC (CSXT) interchange in Grand Rapids, MI. The proposed transaction to convey NSR's Grand Rapids to Elkhart Junction line to Michigan Central Railway, LLC (MCR) will insert yet another party adding additional costs and delivery delays. Martin Marietta believes that this transaction will further impair NSR's ability to compete with CSXT for MQT traffic.

The STB's approval of the proposed transaction without conditions will essentially eliminate market competition for rail shipments originating or terminating on MQT. This will leave the sole provider, CSXT with the ability to implement unreasonable pricing for rail shipments into and out of Martin Marietta's Manistee, MI facility. Martin Marietta respectfully submits that the STB consider this carefully and advocate a position to protect shippers such as Martin Marietta from abuses of market power that would be a consequence of an unconditional approval of the proposed transaction.

Martin Marietta endorses the conditions of approval submitted by the Dow Chemical Company in their comments and request for conditions regarding this matter. The condition to require the MCR and/or NSR to construct a direct connection to MQT in Grand Rapids will preserve the existing rail shipping alternatives and satisfy the statutory requirements for the exemption necessary for this transaction. Construction of the connection also appears to be feasible and economically reasonable based on our knowledge and experience. Martin Marietta also supports the comments and request for conditions made by MQT relating to haulage rates paid by NSR to MCR. The level of these rates could have an equally unfavorable impact on NSR's ability to competitively service the Manistee, MI facility.

Martin Marietta respectfully requests that the STB condition its approval of this transaction upon the construction by MCR and/or NSR of a direct connection at Grand Rapids between MQT and the NSR track to be acquired by MCR, and upon the haulage rate paid by NSR to MCR.

Sincerely,



**Jim Reithel
General Manager -- Operations
Martin Marietta Magnesia Specialties**

CERTIFICATE OF SERVICE

I hereby certify that I have on this 20th day of September, 2007, served a copy of the foregoing Comments on all parties of record, by first class mail, postage prepaid.

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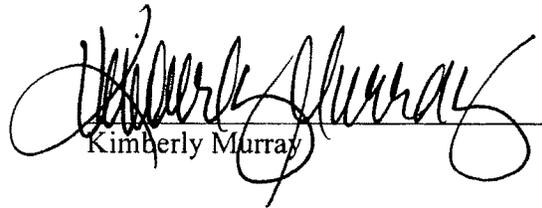
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