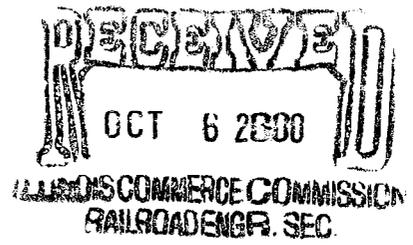


COPY

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION



CITY OF GRANITE CITY,
an Illinois municipal corporation,

Petitioner,

ILLINOIS DEPARTMENT OF TRANSPORTATION
GATEWAY EASTERN RAILWAY COMPANY,
GATEWAY WESTERN RAILWAY COMPANY,
NORFOLK SOUTHERN RAILWAY COMPANY,
and UNION PACIFIC RAILROAD,

Respondents.

Docket No. T00-0003

**INTERROGATORIES OF RESPONDENTS GATEWAY EASTERN RAILWAY
COMPANY AND GATEWAY WESTERN RAILWAY COMPANY
DIRECTED TO ILLINOIS DEPARTMENT OF TRANSPORTATION**

COME NOW Respondents Gateway Eastern Railway Company and Gateway
Western Railway Company and pursuant to Section 200.360(c) of the Illinois
Commerce Commission Rules of Practice and Rule 213 of the Illinois Rules of Civil
Procedure propound the following interrogatories to Illinois Department of
Transportation to be answered in writing and under oath within 28 days of the date of
service of these interrogatories.

1. State the name, employer, job title and address of every person answering
these interrogatories or providing information for these answers, and his or her
relationship to the Illinois Department of Transportation.

RESPONSE:

DOCKETED

2. State whether or not the Department of Transportation has had any conferences, meetings or discussions regarding the rail-highway grade separation project (including associated grade crossing closures and road relocations) that is the subject matter of the Petition filed by the City of Granite City in this cause (hereinafter referred to as "Pontoon Road Grade Separation Project"). If your answer is in the affirmative, please state:

- a. With whom the conference, meeting or discussion was held;
- b. The date the conference, meeting or discussion was held;
- c. The names and addresses of all persons in attendance;
- d. Whether or not there exist any minutes or memorandum documenting the conference, meeting or discussion and the name and address of any person in possession of such minutes or memorandum.

RESPONSE:

3. State the name, address, employer, and job title of each person who participated in the planning or development of the Pontoon Road Grade Separation Project, or who prepared any study or report in connection with said project.

RESPONSE:

4. State whether there has been any investigation, study or analysis of the feasibility, cost, or funding options for the Pontoon Road Grade Separation Project, and if so, with respect to each such investigation, study, or analysis, state the title and date of same and the name, address, employer, and job title of the person in charge of preparing same.

RESPONSE:

5. State whether in the past 10 years there has been any investigation, study, or analysis of the Pontoon Road/Route 203 intersection, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- b. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

6. State whether in the past 10 years there has been any investigation, study, or analysis of traffic congestion or traffic flow on Pontoon Road or Route 203, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- b. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

7. State whether in the past 10 years there has been any investigation, study, or analysis of traffic congestion or traffic flow in Granite City, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- b. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

8. State whether in the past 10 years there has been any investigation, study, or analysis of the potential impact on Granite City and/or Madison County of the proposed new I-70 Mississippi River crossing, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- b. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

9. State whether in the past 10 years there has been any investigation, study, or analysis of the impact of railroad tracks and grade crossings on Granite City, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- b. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

10. State whether in the past 10 years there has been any investigation, study, or analysis of economic, industrial, commercial, or residential development in Granite City and/or surrounding areas, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- b. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

11. State whether in the past 10 years there has been any investigation, study, or analysis of economic, industrial, commercial, or residential development in Madison County, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- a. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

12. State whether in the past 10 years there has been any investigation, study, or analysis of economic, industrial, commercial, or residential development along the Route 203 corridor, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- b. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

13. State whether in the past 10 years there has been any investigation, study, or analysis of land use, land development, issuance of building or occupancy permits, or other measure of economic activity in any area that includes land within a one-mile radius of the Pontoon Road/Route 203 intersection, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- b. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

14. State whether in the past 10 years there has been any investigation, study, or analysis of safety issues with respect to rail traffic in Granite City, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- b. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

15. State whether there has been any cost-benefit analysis of the Pontoon Road Grade Separation Project, and if so, with respect to each such analysis, state the following:

a. The name, address, employer, and job title of the person who conducted such analysis.

a. The title and date of each written report relating to such analysis.

RESPONSE:

16. State the percentage of the total cost of the Pontoon Road Grade Separation Project that benefits the railroads that operate trains through the grade crossing at Pontoon Road.

RESPONSE:

17. State in detail how the Pontoon Road Grade Separation Project benefits each railroad that operates trains through the grade crossing at Pontoon Road

RESPONSE:

18. Quantify in dollars, or as a percentage of the total project costs, the benefit of the Pontoon Road Grade Separation Project to each railroad and explain how you calculated that figure.

RESPONSE:

19. State the percentage of the total cost of the Pontoon Road Grade Separation Project that benefits the City of Granite City and/or its citizens.

RESPONSE:

20. State in detail how the Pontoon Road Grade Separation Project benefits the City of Granite City and/or its citizens.

RESPONSE:

21. Quantify in dollars, or as a percentage of total project costs, the benefit of the Pontoon road Grade Separation Project to the City of Granite City and/or its citizens and explain how you calculated that figure.

RESPONSE:

22. State the percentage of the total cost of the Pontoon Road Grade Separation Project that benefits Madison County and/or its citizens.

RESPONSE:

23. State in detail how the Pontoon Road Grade Separation Project benefits Madison County and/or its citizens.

RESPONSE:

24. Quantify in dollars, or as a percentage of total project costs, the benefit of the Pontoon Road Grade Separation Project to Madison County and/or its citizens and explain how you calculated that figure.

RESPONSE:

25. State the percentage of the total cost of the Pontoon Road Grade Separation Project that benefits the State of Illinois and/or its citizens.

RESPONSE:

26. State in detail how the Pontoon Road Grade Separation Project benefits the State of Illinois and/or its citizens.

RESPONSE:

27. Quantify in dollars, or as a percentage of total project costs, the benefit of the Pontoon Road Grade Separation Project to the State of Illinois and/or its citizens and explain how you calculated that figure.

RESPONSE:

28. State whether the Pontoon Road Grade Separation Project benefits any entity besides the City of Granite City, Madison County, the State of Illinois, and the railroads that operate trains through the grade crossing at Pontoon Road, and with respect to each such entity, state the following:

- a. Describe in detail the benefit to such entity.
- b. Quantify in dollars, or as a percentage of total project costs, the benefit of the project to such entity and explain how you calculated that figure.

RESPONSE:

29. State whether the Illinois Department of Transportation administers federal funds for rail-highway grade separation projects and, if so, describe such program.

RESPONSE:

30. State whether the Pontoon Road Grade Separation Project, or any part thereof, is eligible for federal funding and, if so, describe such funding and how much federal money would be available for the Pontoon Road Grade Separation Project.

RESPONSE:

31. State whether anyone ever applied for or petitioned the Illinois Department of Transportation for federal funds for the Pontoon Road Grade Separation Project, any or part thereof and, if so, state whether Illinois Department of Transportation ever agreed to make federal funds available for the project and the amount of funds Illinois Department of Transportation agreed to make available and identify all document relating thereto.

RESPONSE:

32. State whether anyone applied for or petitioned the United States Department of Transportation for federal funds for the Pontoon Road Grade Separation Project and, if so, state whether the U.S. Department of Transportation ever agreed to

make federal funds available for the project and the amount of funds the U.S. Department of Transportation agreed to make available and identify all documents relating thereto.

RESPONSE:

33. State the name, address, employer and job title of every employee or representative of the City of Granite City with whom any employee or representative of the Illinois Department of Transportation has communicated regarding the Pontoon Road Grade Separation Project.

RESPONSE:

34. State the name, address, employer and job title of every employee or representative of the Illinois Department of Transportation who has communicated with any employee or representative of the City of Granite City regarding the Pontoon Road Grade Separation Project.

RESPONSE:

35. State the name, address, and legislative district of each state senator or state representative with whom any employee or representative of the Illinois Department of Transportation has communicated regarding the Pontoon Road Grade Separation Project.

RESPONSE:

36. Describe the impact, if any, the failure to include federal funding in the Pontoon Road Grade Separation Project will have on the availability of state funding for other highway or highway-rail crossing projects in the State of Illinois over the next ten years.

RESPONSE:

37. State whether any analysis has been made of the impact, if any, the failure to include federal funding in the Pontoon Road Grade Separation Project will have on the availability of state funding for other highway or highway-rail crossing projects in the state of Illinois over the next ten years, and if so, with respect to each such analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such analysis.
- b. The title and date of each written report relating to such analysis.

RESPONSE:

38. State whether anyone has applied with the Illinois Department of Transportation's Bureau of Railroads for funding for any aspect of the Pontoon Road Grade Separation Project, and if so, with respect to each such application, state the following:

- a. The name, address, employer, and job title of the person who prepared and/or submitted such application.
- b. The title and date of such application.

RESPONSE:

39. State how much of the total cost of the Pontoon Road Grade Separation Project is directed to relocation of roads and utilities and how you determined that amount.

RESPONSE:

40. State the number of projected motor vehicle-train collisions at the Pontoon Road Crossing in the next twenty years under each of the following scenarios:

- a. The grade crossing is left in its present configuration.
- b. The grade separation is built.
- c. Some other type of upgrade is made to the crossing.

RESPONSE:

41. State whether there has been any investigation, study, or analysis comparing the number of projected motor vehicle-train collisions at the Pontoon Road Crossing in the future if the grade crossing is left in its present configuration versus the number of projected future motor vehicle-train collisions at the crossing if a grade separation is built versus the number of projected motor vehicle-train collisions at the crossing in the future if some other type of upgrade is made to the crossing, and if so, with respect to each such investigation, study, or analysis, state the following:

- a. The name, address, employer, and job title of the person who conducted such investigation, study or analysis.
- b. The title and date of each written report relating to such investigation, study, or analysis.

RESPONSE:

42. State the number of motor vehicle-train collisions you project will occur at the Pontoon Road Crossing in each of the next twenty years if the grade separation is not built and the crossing is left in its present configuration, stating how many of the projected collisions each year will involve fatalities and how many will involve injuries requiring medical attention.

RESPONSE:

43. In accordance with Supreme Court Rule 213 (g) please state the following:

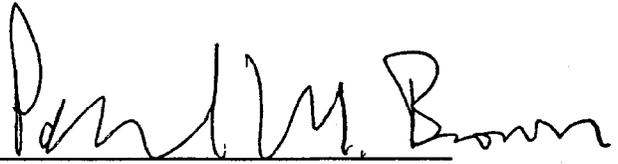
- (a) the name, address and telephone number of all opinion witnesses;
- (b) the subject matter on which each opinion witness is expected to testify;
- (c) the conclusions and opinions of each opinion witness and the bases therefor;
- (d) the qualifications of each opinion witness;
- (e) please produce a copy of all reports of retained opinion witnesses and copies of all documents or other material supplied to, relied upon or utilized by said opinion witnesses in formulating their opinion, other than books and treatises, and a complete copy of the file prepared by and maintained by said opinion witnesses with regard to allegations set forth in Petitioner's Petition.

RESPONSE:

OF COUNSEL:

Thompson Coburn LLP

Respectfully submitted,

By 

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Attorneys for Gateway Eastern
Railway Company and Gateway
Western Railway Company

CERTIFICATE OF SERVICE

The undersigned states that a true and correct copy of the foregoing interrogatories were deposited in the U.S. Mail, first Class, postage prepaid on the 2nd day of October, 2000, addressed to each of the following:

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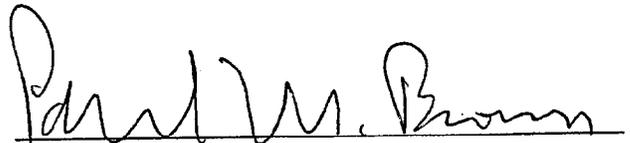
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