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NARPO
Comment Letter

FD-36387

In a letter dated September 4, 2020 regarding a Declaratory Judgement to the STB, the attorney for Ohio Rail Development Commission (ORDC) states they want a Discontinuance over the rail line in question so they can impose railbanking on the line under 16 USC 1247(d). It is NARPO's understanding that the STB does not allow railbanking on rail lines subject to a Discontinuance. The STB only allows railbanking on Abandoned rail lines.

If the STB does decide that the rail line in FD 36387 is in fact still under the STB jurisdiction, then the STB should not allow railbanking on the rail line as ORDC has asked for a Discontinuance.

If the STB does decide the rail line in FD 36387 is not under the STB jurisdiction, then railbanking of the line will not be allowed.

Sincerely yours, Dick Welsh--NARPO

All parties of records were sent a copy of this email.