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January 19, 2021

VIA ELECTRONIC MAIL

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E. Street S.W., Room 1034
Washington, DC 20423-0001

Re: **Docket No. FD 36332**
 National Railroad Passenger Corporation – Petition
 For Proceedings under 49 U.S.C. § 24903(c)(2)

Dear Ms. Brown:

The following errata were identified in the Reply Legal Brief of the Commuter Rail Division of the Regional Transportation Authority and the Northeast Illinois Commuter Railroad Corporation (collectively, “Metra”) filed on June 24, 2020 (under seal) and July 1, 2020 (public):

On p. 1, reference to the Great Hall should be “Great Hall Building Concourse” and the final line’s reference to \$2.4 million should be \$1.6 million.

On p. 4, n. 4, reference to the Regional Rail Reorganization Act of 1973, Pub. L. No. 93-236, should be a reference to the Rail Passenger Service Act of 1970, Pub. L. No. 91-518, § 402.

The following references to the Great Hall should be replaced with the phrase “Great Hall Building Concourse”:

On p. 8, in the first line.

On p. 12, on the penultimate line of the penultimate paragraph - subpart A.

On p. 17, in the penultimate line of the introductory paragraph - subpart A.

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On p. 21, in the fourth line of subpart D.

On p. 25 , the relevant text should read as follows:

Amtrak, on the other hand, has declared in its opening statement that nearly 85,000 square feet~~the entire 120,040 square feet~~ of the Great Hall Building Concourse should be considered an area commonly benefitting both passenger carriers.

On p. 26, in the final three lines of the first partial paragraph and throughout the second paragraph.

On p. 27, various references.

On p. 28, various references.

On pp. 28-29, the relevant text should read as follows:

Amtrak, on the other hand, has declared in its opening statement that nearly 85,000 square feet~~the entire 120,040 square feet~~ of the Great Hall Building Concourse should be considered an area commonly benefitting both passenger carriers.

By this last-minute maneuver, Amtrak has declared nearly the entire area of the Great Hall Building Concourse—roughly~~120,040~~ 85,000 square feet—to be of common benefit to the two railroads, whereas Metra, consistent with the Consensus Floor Plans, has deemed 11,092 square feet of the Great Hall Building Concourse to be of common benefit (while the balance would be attributed exclusively to Amtrak). Correcting Amtrak’s misallocation of the disputed~~108,948~~ 74,000 square feet in the Great Hall Building Concourse results in an additional ~~\$2,364,560~~ \$1,606,064 reduction to Amtrak’s calculation of Metra’s share of 2018 SOM costs, for a total reduction of ~~\$3,960,724~~ approximately \$3.1 million

On p. 29, various references other than Ms. Suchy’s quotes should be to “Great Hall Building Concourse.”

On p. 29, reference to “\$4 million footnotes” should be reference to “\$3 million footnotes.”

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Metra offers these errata following discussions with Amtrak which commenced in June of 2020, were suspended during the abeyance of this proceeding, and, after the December 15, 2020 joint issues filing, Amtrak asked to revisit.

Very truly yours,

Robert A. Wimbish

Robert A. Wimbish
Attorney for Metra

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cc: Parties of record