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January 11, 2021



Ms. Cynthia T. Brown  
Chief of the Section of Administration, Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W.  
Washington, D. C. 20423

Re: Docket No. FD 36472, *CSX Corporation and CSX Transportation, Inc.-Control and Merger-Pan Am Systems, Inc., et al.*

Dear Ms. Brown:

Rail Enterprise Group (REG) supports the application filed by CSX Transportation, Inc. ("CSXT") to acquire and operate Pan Am Systems, Inc., and its railroad subsidiaries, including its operating subsidiary Springfield Terminal Railroad Company ("Springfield Terminal"). We believe that this transaction will create new competitive options for shipments to and from New England and should qualify as a minor transaction pursuant to 49 C.F.R. § 1180.2(c).

REG owns and operates four short line railroads, three of which connect with and are switch carriers for CSXT. These railroads are:

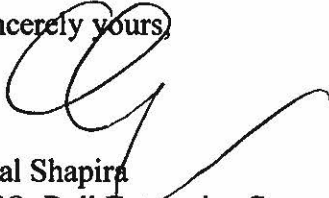
Raritan Central Railway (RCRY); Interchange location – Raritan Center, NJ  
Pennsylvania & Southern Railway (PSCC); Interchange location – Culbertson, PA  
Wolf Creek Railroad (WCKR); Interchange location – Milan, TN

The Rail Enterprise Group team was pleased to learn that CSXT has reached an agreement to acquire Pan Am Systems. The fragmented nature of the rail network into and throughout the New England region has made it difficult for railroads to compete with trucks for medium haul shipments between New England and the Mid-Atlantic region. We are hopeful that unified, single line routes between New England and the eastern U.S. will enable railroads to become competitive in that market.

We look forward to working with CSXT marketing teams to pursue new opportunities including forest products from New England mills which could move by rail through the various reload and warehouse facilities served by our Raritan Central and Pennsylvania & Southern Railways – a market which we believe is largely untapped and holds much promise.

Therefore, REG and its short line railroads support the proposed merger and respectfully request that the Board expeditiously approve the acquisition of Pan Am Systems and its subsidiaries by CSXT.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Eyal Shapira', with a long, sweeping underline that extends to the right.

Eyal Shapira  
CEO, Rail Enterprise Group  
President, Raritan Central Railway; Pennsylvania & Southern Railway; Wolf Creek Railroad;  
Iowa & Middletown Railway  
One Gateway Center, Suite 501B  
Newton, MA 02458

Cc: CSX Transportation, Inc.