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Office of Proceedings
April 13, 2021
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April 13, 2021

Ms. Allison Davis
Director, Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Surface Transportation Board Docket FD_36496 ID 301767
- National Railroad Passenger Corp Under 49 U.S.C.
Section 24308(e) - CSX Transportation, Inc., and Norfolk
Southern Corporation.

Dear Ms. Davis:

The Alabama Railway Association (ARA) is a non-profit association that was founded in 2003. We are a trade organization that represents all railroads in Alabama, from short lines to Class I railroads, along with many associate members that supply services and/or materials to support our operations.

We are writing to urge the Surface Transportation Board to deny Amtrak an Order to implement new passenger service between Mobile, Alabama and New Orleans, Louisiana, without completion of its Rail Traffic Control Study with supplemental engineering and cost report.

Several of our members serve the public terminals at the Port of Mobile. Our industry has applauded and supported public / private investments at the Port's public terminals with the objective of generating capacity, attracting carrier services and to growing Alabama's rail served freight markets. Investments at the Port of Mobile have retained or expanded businesses and attracted new industry, making Alabama's port one of the fastest growth ports in the nation. In turn, our regional businesses have been able to compete globally and create American jobs.

The ARA has deep reservations regarding Amtrak initiating new passenger rail service at Mobile without the proper study or investment to ensure freight and container intermodal rail service is not degraded, and ensuing there is sufficient capacity for continued freight growth. Moreover, we are concerned about resulting congestion or delay impacts to supply chains and transportation rates should passenger rail enter the corridor without proper assessment. In response to those concerns, ARA understood Amtrak initiated a freight modeling study and a supplemental engineering and cost assessment in early 2020. As the study was nearing completion in late January 2021, we learned that Amtrak cancelled the study. We also understood that the host railroads, the Alabama State Port Authority, and our elected officials asked Amtrak to complete the study work to support informed decisions regarding the utilization of the CSX Gulf Coast rail corridor. Now, we are troubled that Amtrak seeks an injunction from the Surface Transportation Board to bypass this important step in assessing rail operations and capacity in this important single-track freight corridor.

The ARA respectfully asks that the Board require Amtrak to complete the modeling study and supplemental rail infrastructure and cost assessments to identify the improvements necessary to safely and efficiently support both freight rail and passenger services at Mobile, Alabama.

Sincerely,

A handwritten signature in blue ink that reads "Maeci Walker".

Maeci Walker
Executive Director, Alabama Railway Association

C: Parties of Record