



April 21, 2021

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

ENTERED
Office of Proceedings
April 21, 2021
Part of
Public Record

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 Louisiana Railroad Association (LRRRA) is an unincorporated trade association of which I the undersigned has been its General Counsel and Legislative Representative since March 1982. Six (6) Class I railroads and seven (7) short line railroads comprise the membership of LRRRA.

I am writing on behalf of the LRRRA members to urge and request the Surface Transportation Board to deny Amtrak's Petition for 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 reports. This new passenger service will start and terminate in New Orleans, Louisiana where all of the Class I railroads operate. We are concerned that Amtrak's implementation of this new passenger service may occur without the completion of their Rail Traffic Control Study. This Study, if completed, may identify additional infrastructure needs to provide a safe, efficient and sustainable service.

The LRRRA has deep reservations regarding Amtrak initiating new passenger rail service on the Gulf Coast route 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. It is LRRRA's understanding that 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 and others have asked Amtrak to complete the study work to support informed decisions regarding the utilization of the 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. It is further our understanding that major infrastructure and engineering is of necessity for a sustainable passenger service on this line.

The LRRRA respectfully requests that the Board deny Amtrak's Petition and 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 on the Gulf Coast rail corridor.

Sincerely,


Carmack M. Blackmon

General Counsel and Legislative Representative
Louisiana Railroads Association

Cc: Parties of Record