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May 12, 2021

Cynthia T. Brown
Section of Administration, Office of Proceedings
Surface Transportation Board
395 E Street, SW Washington, DC 20423-0001

**Re: *American Rocky Mountaineer, LLC—Petition For Exemption from
49 U.S.C. Subtitle IV, Finance Docket No. 36468***

Dear Ms. Brown:

On May 7, 2021, American Rocky Mountaineer, LLC (“ARM”) submitted a letter to the Board in which ARM reaffirmed its prior request that the Board expedite its consideration of ARM’s petition for a blanket exemption from Subtitle IV of Title 49 and issue a decision before May 31, 2021. Alternatively, ARM requested that the Board “grant ARM a transaction/service exemption from 49 U.S.C. § 10901 to enter into an agreement with Union Pacific Railroad Company to operate the passenger rail excursion service between Denver, Colorado and Moab, Utah, as described on pages 2-3 of the ARM Petition, by May 31.”

The Brotherhood of Locomotive Engineers and Trainmen (“BLET”), which responded to the ARM petition by opposing a blanket exemption and asserting that ARM should not be exempt from certain Sections of Subtitle IV, does not object to ARM’s request for expedited handling of its petition. Additionally, BLET does not object to the Board granting ARM a limited exemption for this transaction from the prior approval requirements of 49 U.S.C. § 10901 while the Board considers the arguments presented by the parties on ARM’s full petition. BLET understands ARM’s desire to start operations. And since the alternative request involves only an exemption of the transaction (initiation of the described new service pursuant to ARM’s agreement with Union Pacific), and not an exemption of the entity (ARM)

from regulation generally, and the exemption would be limited to that particular transaction, BLET does not object to ARM's alternative request.

Sincerely,

/s/ Richard S. Edelman
Richard S. Edelman

Joshua D. McInerney

Counsel for BLET

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused copies of the foregoing letter to be served by

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May 12, 2021

/s/Richard S. Edelman
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