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CSXT/PAR-36

VIA E-FILING

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

Re: **STB Docket No. FD 36472, CSX Corporation and CSX Transportation, Inc., et al.—
Control and Merger—Pan Am Systems, Inc., Pan Am Railways, Inc., Boston and
Maine Corporation, Maine Central Railroad Company, Northern Railroad, Pan Am
Southern LLC, Portland Terminal Company, Springfield Terminal Railway
Company, Stony Brook Railroad Company, and Vermont & Massachusetts
Railroad Company**

Dear Ms. Brown:

Enclosed please find (1) an op-ed piece supporting the Application filed in the above-referenced matter, written by Timothy P. Murray, president and CEO of the Greater Worcester Regional Chamber of Commerce, published in Commonwealth Magazine on August 6, 2021, and (2) a letter in support of the Application from New Hampshire Central Railroad, Inc.

Respectfully submitted,

/s/ Anthony J. LaRocca

Anthony J. LaRocca
Peter W. Denton
Sally Mordi
*Attorneys for CSX Corporation and
CSX Transportation, Inc.*

Enclosures

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cc: Louis E. Gitomer
All parties of record



TRACKING TRANSPORTATION / TRANSPORTATION / OPINION

CSX merger with Pan Am is good for region

Would lead to improvements in infrastructure, operations



TIM MURRAY Aug 6, 2021

THROUGHOUT MY CAREER in both public office and private industry, I've worked alongside like-minded New Englanders to help create economic opportunity throughout our region. This is true of my tenure as lieutenant governor of Massachusetts, my terms as mayor and city council member in Worcester, and in my current role as president/CEO of the Worcester Regional Chamber of Commerce.

In that regard, we have transformed our city into a modern, future-ready community and region. Progress like what we've seen here in Worcester doesn't happen overnight, and it doesn't happen without a lot of committed, focused people pulling in the same direction. Large-scale progress also requires serious capital investment, whether you're talking about Worcester, the entire state, or all of New England.

Attracting investment is key to a region's ability to grow. During my three terms as mayor, Worcester was home to around \$1 billion in new economic development projects, and that capital has helped to fuel the progress we've seen in recent years. Cultivating that kind of private investment is incredibly important. I can say from firsthand experience that it's also challenging.

That's why it's so important that, when a potentially beneficial project surfaces, we are decisive in voicing our support and doing what we can to capitalize on the opportunity in hopes of making our community an even better place to live and work.

That's what's at hand with the proposed merger of CSX, one of seven so-called Class I railroads in North America, with Pan Am Railways, a regional railroad that's been operating in New England for many years.

This merger would bring the substantial investment capital, operational expertise, and innovation prowess of one of the best railroad operators in the business into our back yard. That promises to be an economic boon for New England, and it's great news for companies that rely on freight rail and the passenger rail network alike.

If approved, CSX has indicated they would take extensive steps to improve Pan Am's existing infrastructure and operations, driving drastic improvements to the broader regional railroad network.

For example, CSX plans to upgrade Pan Am's aging rail lines to support larger loads and higher speeds, replacing older, less efficient locomotives with newer, more powerful models that also run cleaner, thereby benefiting our environment. Additionally, CSX will add new technology capabilities such as positive train control, which help to remove human error from the equation and better ensure that freight and passengers alike arrive safely and on

time. All of these upgrades will further benefit the environment by helping to take additional trucks off of our highways, which has the potential to reduce greenhouse gas emissions by up to 75 percent.

I believe in this project on its merits – it represents yet another step our region can take to continue to power our way into the future. But I also support this project because I have confidence in CSX. It's a good company run by smart people that has proven itself willing to think creatively and collaboratively so freight rail and passenger rail can co-exist and benefit from one another. As lieutenant governor, I led the state team that acquired strategic track and property rights from CSX across Massachusetts for commuter rail, which also resulted in a \$100 million investment by CSX in their intermodal terminal here in Worcester. That partnership between the Commonwealth and CSX was a good deal for our community, bringing improved service and more commuter trains – good for shippers and passengers alike, and creating good jobs.

CSX demonstrated throughout the process that they're a good corporate citizen that's committed to investing in and improving its network.

Railroads are deeply entwined in our way of life in New England, whether it's local companies moving goods to market or passengers traveling within the region. I believe strongly that the proposed CSX/Pan Am merger will make our rail system stronger, bringing improved service not just to freight rail but passenger rail as well.

Attracting investment is hard work. The CSX merger will strengthen the economy and lead to needed investment in our regional rail infrastructure. Moreover, CSX is a proven freight rail operator and their expanded presence will create more jobs in the New England region.

Timothy P. Murray is the president and CEO of the Greater Worcester Regional Chamber of Commerce.

Tagged in: Transportation

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NEW HAMPSHIRE CENTRAL RAILROAD, INC.

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October 4, 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:

I am president and owner of New Hampshire Central Railroad (reporting mark NHCR), a Class III common carrier freight railroad based in North Stratford, New Hampshire providing rail services over a state-owned rail line in the North Country of the state. The railroad serves a transload, bulk fuel distribution center and repair facility in North Stratford. The state-owned trackage is composed of a line between North Stratford and Columbia, New Hampshire, previously operated by the North Stratford Railroad and Maine Central RR. The NHCR also has rights to operate two other lines in New Hampshire: the Groveton Branch between Groveton and Whitefield, and the Berlin branch between Whitefield and Littleton.

I have been directly involved in the New Hampshire Central Railroad since its creation in 1993, and before then have involved deeply in the New England rail freight industry.

This letter is submitted in support the application by CSX Corporation and CSX Transportation, Inc. filed with the Surface Transportation Board (STB) for authority to acquire Pan Am Systems, Inc. and its railroad subsidiaries, including its operating subsidiary, the Springfield Terminal Railroad Company. Specifically, I write to support the creation of a new Genesee & Wyoming Inc. subsidiary, Berkshire & Eastern Railroad, to operate Pam Am Southern, and to address some of the negative comments made on this aspect of the control case under consideration by the STB.

The negative comments made towards the potential of the Berkshire & Eastern Railroad operating Pam Am Southern in no way reflect my experiences in working with another Genesee & Wyoming subsidiary in New England, the St. Lawrence & Atlantic Railroad (SLR). In fact, there are important points I believe the STB should carefully consider based on my experiences:

- NHCR has only one means to connect to the national freight network, and that is through the SLR at North Stratford, New Hampshire. In all my many years of dealing with SLR managers I have found them fair, honest and very cooperative.

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Surface Transportation Board
October 4, 2021

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- While a significant part of NHCR revenues is associated with transloading of freight, an activity that by definition can be replicated elsewhere, SLR has never taken any action to restrain or disadvantage this effort. Our relationship is based on mutual respect and growth.
- NHCR operations are over lines also owned by a state, in my case the State of New Hampshire. New Hampshire Department of Transportation, NHCR and SLR all work together cooperatively to meet the needs of each railroad and best serve the citizen of our state.
- As with any good connecting railroads, NHCR and SLR have cooperated together when one or the other faces operating challenges. This is a routine practice by not only SLR. As reported over the years in the trade press, other Genesee & Wyoming Class III short lines have taken such actions with other connecting carriers in surrounding New England states, demonstrating a clear willingness to help other carriers.

In conclusion, I strongly encourage STB commissioners to grant its approval of this control case and the assumption of rail operations of PAS by Berkshire & Eastern Railroad. Both CSX and Genesee & Wyoming have demonstrated a clear and strong commitment to New England. Unsubstantiated accusations should not be the basis to stop or change this very positive step forward in the evolution of the New England rail network to meet the 21st Century freight transportation needs of the region.

Very respectfully,



Edward W. Jeffrey
President/COO
New Hampshire Central Railroad, Inc.

cc: CSX Transportation, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have caused this Letter in Docket No. FD-36472, *CSX Corporation and CSX Transportation, Inc.—Control and Merger—Pan Am Systems, Inc., Pan Am Railways, Inc., Boston and Maine Corporation, Maine Central Railroad Company, Northern Railroad, Pan Am Southern LLC, Portland Terminal Company, Springfield Terminal Railway Company, Stony Brook Railroad Company, and Vermont & Massachusetts Railroad Company*, to be served electronically or by first class mail, postage pre-paid, on all parties of record in this proceeding.

/s/ Sally Mordi

Sally Mordi
*Attorney for CSX Corporation and
CSX Transportation, Inc.*

October 15, 2021