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By E-Filing

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

ENTERED
Office of Proceedings
February 3, 2022
Part of
Public Record

Re: Gulf Coast Passenger Service Between New Orleans and Mobile
STB Finance Docket No. 36496

Dear Ms. Brown:

The Alabama Mining Association is a 501c(6) nonprofit trade association located in Montgomery, Alabama, and our members rely on the freight rail service provided by CSX Transportation, Inc. I write on behalf of the coal industry in Alabama to express concerns regarding the impact on freight rail service of Amtrak's proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama.

The Alabama Mining Association's members produce metallurgical and thermal coal and rely on CSXT to transport finished products to their customers. Freight rail service is critical to the success of our member's businesses and CSXT provides them access to two major port terminals in New Orleans and Mobile through which they can access greater domestic and international markets than would otherwise be available. The quality of service CSXT provides makes freight rail the most efficient transportation alternative to maintain and grow their businesses.

CSXT and Norfolk Southern Railway Company have submitted evidence, including a Rail Traffic Controller study, that shows the introduction of Gulf Coast passenger service between New Orleans and Mobile will cause significant harm to freight service. This harm will manifest itself through decreased freight train speeds and delay as well as extreme operational variability. CSXT's local trains, the very trains that directly serve our member's facilities will be hit the hardest. The Alabama Mining Association is deeply concerned about our members and their ability to meet the demands of their customers and remain profitable if this harm to CSXT's freight rail service materializes.



The Alabama Mining Association does not oppose Gulf Coast passenger service and expresses no opinion on the merits of that service. However, it is important that the introduction of this passenger service does not decrease the quality of freight service provided by CSXT. It is our understanding that CSXT and NSR have proposed infrastructure projects that would support Amtrak's desired passenger service while protecting the quality of freight service that our members rely on. The Alabama Mining Association urges the Board to seriously consider the merits of these projects.

It is unfair for Amtrak to insist on operating passenger service without regard to the businesses it will share the corridor with. If Amtrak is permitted to commence passenger service without paying its own way, the cost of that service will inevitably fall on the shoulders of shippers. Shippers like Alabama Coal Association members will either be forced to turn to more expensive and less efficient alternatives to rail or will wind up subsidizing passenger service through increased rail service costs as CSXT and NSR are pressed to add infrastructure to stem the degradation to freight service.

The Board has an obligation to protect the interests of all parties that rely on the national rail network, not just those of passenger rail. Amtrak's desire for access to the Gulf Coast Corridor with no strings attached is not only harmful to freight rail service, but untenable given the substantial funding it received from Congress last year. The Alabama Mining Association requests that the Board require Amtrak to fund and facilitate the construction of infrastructure projects so as to avoid any harm to freight rail service.

Respectfully submitted,

A handwritten signature in black ink that reads "Patrick V. Cagle". The signature is written in a cursive style with a large, stylized 'P' and 'C'.

Patrick V. Cagle
President
Alabama Mining Association

cc: FD 36496 Service List