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Via E-Filing

February 7, 2022

Mr. Martin J. Oberman, Chairman
Surface Transportation Board
395 E. Street, SW. Washington, D.C. 20423

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RE: Docket No FD 36496, Application of the National Railroad Passenger Corporation under 49 U.S.C. 24308€- CSX Transp., Inc. and Norfolk S. Ry. Co.

Dear Chairman Oberman:

Below are the points that the Rail Users' Network plans to present at the STB Public Hearing to be held Feb.15-16, 2022. We respectfully request 15 minutes to cover the points listed below.

The Rail Users' Networks, is a non-profit organization which represents the interests of Long Distance, Regional and Commuter rail passengers as well as rail transit riders in the United States. Our mission is to improve and expand rail passenger service to provide mobility for all including those that cannot drive and those that do not want to drive to minimize the effects of climate change. Besides publishing an award-winning newsletter, we hold annual conferences and public forums in different parts of the country each year and provide testimony to legislative bodies at the state and national level.

1. There is a huge discrepancy between the FRA's figure to upgrade the track between New Orleans & Mobile, AL,- \$118 million, and the CSX's figures, \$2.3 billion.

We support the FRA's cost estimate regarding the infrastructure improvements needed to allow two daily round trips from New Orleans to Mobile, Alabama. (The FRA has expertise and experience concerning railroad infrastructure and its rulings and conclusions are entitled to deference from tribunals such as the STB and we look less favorably on numbers generated by a private entity.)

2. ADA and other concerns regarding lack of mobility along the proposed line.

Persons without private vehicles or who may not be able to drive the distance between various cities have no acceptable options without the proposed new Amtrak service. There is very limited bus service between these two cities and there is no intercity bus service to Bay St Louis, Gulfport or Pascagoula.

3. The January 28 ruling concerning confidentiality of freight movements on CSXT.

This should be reversed. In order to determine how much new capacity is needed, CSXT needs to disclose how much of its existing capacity is in use. i.e the number of trains that are operating on any given day, the length of the train, how fast they are moving, current location, where they are going, and at what cost.

4. CSX is putting pressure on its shippers to testify at the hearing.

If CSX is anti-passenger rail, it should not be allowed to purchase Pan Am Railway in New England, which stands to gain additional passenger rail service in the future. We predict that if opposition is the policy in New Orleans, then it will be the policy in New England, as soon as a merger is approved.

5. The US needs passenger rail capacity to support and grow the current economy and to support military personnel and their equipment & supplies if a large number of personnel need to be moved domestically. Passenger rail
invigorates downtowns, fueling growth in housing and business
supports tourism
creates high-paying jobs in construction and operators of the service
helps states achieve environmental goals
enriches the lives of all citizens by providing increased mobility opportunities
lowers the financial burden of building and widening roadways.

6. Amtrak's plan known as Connect US 2035 should not be thwarted.
If the program is fully implemented by 2035, Amtrak expects to have added 30 or more new routes and increased service on at least 20 existing lines.
Up to 160 communities would see new Amtrak service, and 15 states would gain multiple daily trips.

7. This case involving the route between Mobile, AL, New Orleans, LA, and through MS should be considered a test of that plan.

8. Therefore, STB needs to reject the CSXT estimate for the cost of new infrastructure needed on the line between New Orleans and Mobile. If accepted. it will create a dangerous precedent which could ultimately undermine Amtrak's 2035 plan to expand service to other cities across the United States.

Respectably submitted,

"/s/ Richard H. Rudolph
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