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February 11, 2022

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

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

Dear Ms. Brown:

**Perdue AgriBusiness LLC** relies on freight rail service provided by CSX Transportation, Inc. and Norfolk Southern Railway Company. We are writing to express our concerns regarding the **precedent** that Amtrak's proposed Gulf Coast passenger service between New Orleans, LA and Mobile, AL could have on U.S. rail freight operations as well as our rail-served agricultural operations.

**Perdue AgriBusiness LLC** sources, purchases, and processes agricultural commodities including grains, soybean meal, blended feed ingredients, and top-quality oils for the food industry. We are the largest soy crusher in the Mid-Atlantic region, the tenth largest grain company in the U.S., and operate a major import/export facility in Chesapeake, VA. We rely on CSXT and NS to transport agricultural commodities to our 37 rail-served facilities and transport finished products to our customers. Freight rail service is critical to the success of our business and is a critical link in the agricultural supply chain.

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.



**Perdue AgriBusiness LLC** 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 or NS. It is our understanding that CSXT and NS have proposed infrastructure projects that would support Amtrak's desired passenger service while protecting the quality of freight service.

**Perdue AgriBusiness LLC** urges the Board to seriously consider the merits of these projects as passenger traffic should not be unilaterally added to the freight rail network without appropriate capacity and networking infrastructure enhancements.

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 **Perdue AgriBusiness LLC** 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 NS 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 without the necessary infrastructure improvements could establish a dangerous **precedent** for passenger rail access to the rail freight network which would significantly impact agricultural shippers.

**Perdue AgriBusiness LLC** requests that the Board require Amtrak to fund and facilitate the construction of infrastructure projects to avoid any harm to freight rail service.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Scott Fredericksen".

Scott Fredericksen

President, Perdue AgriBusiness LLC

cc: FD 36496 Service List