



Certified
ISO 9001
ISO 14001

Phone 815.987.2700
www.altertrading.com

1100 Seminary Street
Rockford, IL 61104

303780
ENTERED
Office of Proceedings
February 9, 2022
Part of
Public Record

February 08, 2022

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

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

Dear Ms. Brown:

Alter Trading Corp is located in **St Louis, MO** and relies on the freight rail service provided by CSX Transportation, Inc. I write on behalf of **Alter Trading** to express concerns regarding the impact on that freight rail service of Amtrak's proposed Gulf Coast passenger service not only between New Orleans, Louisiana and Mobile, Alabama but potentially across the entire US rail network.

Alter produces **Scrap Metal for remelting** and relies on multiple class I's, including CSXT to transport raw materials to our facility and finished products to our customers. Freight rail service is critical to the success of our business and CSXT provides us access to two major port terminals in New Orleans and Mobile through which we 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 our business.

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 will

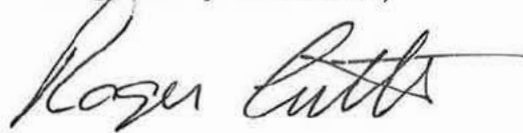
be hit the hardest. **Alter Trading** is deeply concerned about our ability to meet the demands of our customers and remain profitable if this harm to CSXT's freight rail service materializes. Increased car turns and dwell time due to added delays from passenger train service would directly impact our ability to complete orders and maintain profit margins and volumes.

Alter Trading 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 we rely on. **Alter Trading Corp** 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 **Alter Trading** 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 and threatens the vitality of the entire rail network. **Alter Trading Corp** 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, appearing to read "Roger Little", with a stylized flourish at the end.

Roger Little (RF)
Alter Trading Corp

cc: FD 36496 Service List