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March 30, 2022

Ms. Allison Davis
Director, Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Surface Transportation Board Docket FD_36496 ID 301767 - National Railroad Passenger Corp
Under 49 U.S.C. Section 24308(e) - CSX Transportation, Inc., and Norfolk Southern Corporation.

Dear Ms. Davis

The Mississippi Railroad Association (MRRRA) is a trade organization that represents all railroads in Mississippi, from short lines to Class I railroads.

We are writing to urge the Surface Transportation Board to require the completion of the infrastructure recommended by the Rail Traffic Control (RTC) Study prior to issuing Amtrak an Order to implement new passenger service between Mobile, Alabama, and New Orleans, Louisiana. The completion of RTC recommended infrastructure upgrades as a pre-condition to starting passenger service is a long-standing practice designed to ensure that freight service is not degraded and that there is capacity for continuing industrial recruitment along the rail corridor.

Although this particular proposal for new passenger service only impacts one member railroad in Mississippi, our other member railroads fully support adhering to the long established means of implementing new passenger service. Further, our members are not opposed to new passenger service but unanimously support implementing it in a way that ensures safety and efficiency for both systems, and doing so hinges on implementation of the recommendations from the RTC model.

As you are aware, this Gulf Coast rail route is important and unique. It is single track, runs through an environmentally sensitive area, serves many customers along a chemical production corridor, and handles traffic interchanged with the western carriers at the New Orleans Gateway. Additionally, at-grade crossings are very dense along this corridor and there are seven moveable rail bridges that intersect with water traffic, including both pleasure and commercial vessels traveling a water corridor that is already highly affected by weather. Therefore, many modes of transportation, both private and commercial, will be impacted in Mississippi. Supply chains and transportation rates well beyond the borders of this state stand to be affected as well.

MRRRA member companies work closely with state and local economic development agencies to recruit new jobs to the state. We have deep reservations regarding the impact that allowing new passenger service to be implemented without proper infrastructure along the Gulf Coast will have. Our members are also concerned about the impact this new precedent could have in terms of industrial recruitment on rail lines statewide and even beyond the borders of Mississippi, as well as their ability to provide on-time passenger service. MRRRA respectfully asks the Board to require the infrastructure identified by the RTC model prior to implementation of new passenger service.

Sincerely,


Spence Flatgard
Counsel, Mississippi Railroad Association

C: Parties of Record
