

April 14, 2022

Submitted via e-filing

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

Re: STB Docket No. AB 1311, *Metro-North Commuter Railroad Company—Adverse
Discontinuance of Trackage Rights—Housatonic Railroad Company*

Dear Ms. Brown:

Attached for re-filing is the Motion of Metro-North Commuter Railroad Company for Protective Order filed yesterday to provide service to all parties of record on the service list in the above-captioned proceeding.

Please do not hesitate to contact me with any questions.

Sincerely,


Charles A. Spitulnik

Enclosure

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Docket No. AB 1311

**METRO-NORTH COMMUTER RAILROAD COMPANY—ADVERSE
DISCONTINUANCE OF TRACKAGE RIGHTS—HOUSATONIC RAILROAD
COMPANY**

**MOTION OF METRO-NORTH COMMUTER RAILROAD COMPANY FOR
PROTECTIVE ORDER**

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Counsel for Metro-North Commuter Railroad
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Dated: April 13, 2022

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Docket No. AB 1311

**METRO-NORTH COMMUTER RAILROAD COMPANY—ADVERSE
DISCONTINUANCE OF TRACKAGE RIGHTS—HOUSATONIC RAILROAD
COMPANY**

**MOTION OF METRO-NORTH COMMUTER RAILROAD COMPANY FOR
PROTECTIVE ORDER**

Metro-North Commuter Railroad Company (“Metro-North”), through counsel, hereby files this Motion for Protective Order to request the Surface Transportation Board (“STB” or “Board”) to excuse Metro-North from responding to Housatonic Railroad Company’s (“HRRC”) belated March 17, 2022 Request for Production of Documents and Request to Correct and Update Responses to Interrogatories. In addition, Metro-North respectfully requests this Board to remove this proceeding from abeyance and to set a schedule for HRRC to file its response to the Application for Adverse Abandonment that Metro-North filed in this proceeding 11 months ago.

Even though extensive discovery has already been conducted by the parties, HRRC has surprisingly requested further documentation at the eleventh hour. All of the questions HRRC now poses could have been asked before, but HRRC chose not to, seeking now to further delay this proceeding by filing additional discovery about issues that bear no relevance to the issue of whether the public convenience and necessity warrants granting Metro-North’s application. The additional discovery requested seeks information relating to communications between Metro-North and various state, local and federal agencies concerning the planned use of the corridor that is the subject of this proceeding for a pedestrian trail. None of the documents requested will provide any insight into whether the public convenience and necessity justify the termination of

HRRC's authority to operate as a freight common carrier on the subject line, which is the issue before this Board. The second discovery request seeks confirmation that Metro-North's prior responses to discovery remain true as of today. Metro-North is under a continuing obligation to supplement any of its responses to discovery had anything changed and this request is duplicative and unnecessary. This Board cannot condone HRRC's undisguised attempts to delay this proceeding further and should grant Metro-North's Motion for a Protective Order.

BACKGROUND

On April 30, 2021, Metro-North filed an Application for Adverse Discontinuance of Trackage Rights ("Application") of the HRRC over the line of railroad in New York State known as the "Beacon Line" between milepost 0.0 at Beacon, New York, and milepost 71.2 at the Connecticut/New York state line, a distance of 41.1 miles from Beacon, New York to Brewster, New York in Dutchess and Putnam Counties, New York (hereafter, the "Line" or "Beacon Line"). Application, 1.

Metro-North is a New York State public benefit corporation and subsidiary of the Metropolitan Transportation Authority ("MTA"), a New York State public authority. Application, 1. Metro-North acquired the Beacon Line in 1995 for \$4.2 Million. HRRC has exclusive freight operating rights on the Beacon Line pursuant to a Trackage Rights Agreement originally executed between Metro-North and HRRC's predecessor railroad. *Id.* at 3-4.

Since Metro-North acquired the Beacon Line in 1995, no freight traffic has moved on the Line. *Id.* at 5-6, citing Exhibit D, Verified Statement of John Longobardi. Accordingly, in 2020 Metro-North took steps to abandon the Line to alleviate the costs associated with ownership of an active rail line. Pursuant to the authority granted by the Interstate Commerce Commission in 1995, Metro-North is exempt from the provisions of 49 U.S.C. Subtitle IV and may abandon the Beacon

Line subject only to the operating carrier seeking authority to discontinue freight service. Application, 2; *Metro North Commuter R.R. Co.—Acquisition Exemption—The Maybrook Line; Metro North Commuter R.R. Co.—Exemption—From 49 U.S.C. Subtitle IV*, ICC Finance Docket No. 32639 (Sub-No. 1), slip op. at 2 (Service Date Jan. 13, 1995).

Further, the governing Trackage Rights Agreement between Metro-North and HRRC provides that Metro-North may abandon the Beacon Line by giving HRRC 120 days' notice of Metro-North's intent to abandon the Line. Application, 4 (quoting Application, Exhibit B). The terms of the Trackage Rights Agreement require HRRC to seek authority to discontinue its operations on the Line concurrently with Metro-North's abandonment of the Line and prohibit HRRC from interfering with or opposing Metro-North's actions to seek and exercise abandonment authority. *Id.*

Despite HRRC's obligation to seek discontinuance authority and to not interfere with Metro-North's abandonment of the Line, HRRC has indicated its opposition to Metro-North's abandonment of the Line in violation of the Trackage Rights Agreement. *Reply of Housatonic Railroad Company to Petition for Waivers of Discontinuance Regulations and for Exemption*, AB 1311 (filed Feb. 12, 2021).

On May 13, 2021, HRRC sent Metro-North a list of Interrogatories. The Interrogatories contain three parts: Part I – Proposed Abandonment, Part II – Current and Planned Trail Use and Part III – General Line Characteristics, Condition and Maintenance. Metro-North provided HRRC with responses to the requests contained in Parts I and II. However, because the requests contained in Part III are irrelevant and burdensome, Metro-North partially responded and filed a Motion for Protective Conditions to Interrogatories on June 9, 2021.

On June 29, 2021, HRRC filed a Reply to Motion for Protective Conditions, asserting that it needed the responses to the Interrogatories from Metro-North to “properly prepare” its Reply to the Application. *Housatonic Railroad Company Reply to Motion for Protective Conditions*, AB 1311, at p. 8 (filed June 29, 2021). In addition, HRRC argued that the Beacon Line “formerly constituted a major freight link to New England” and signaled HRRC’s intention to “show in greater detail in its Reply [to the Application], that there have been significant freight opportunities in the past and that there are significant freight opportunities currently and in the future that will not be realized by reason of the failure of Metro-North to maintain the line.” *Id.* at 4, 6. The parties agreed to modify HRRC’s Part III Interrogatories, and Metro-North served responses to the modified Interrogatories on October 21, 2021. HRRC conducted a deposition of Metro-North’s Vice President of Maintenance of Way David Melillo on November 21, 2021.

On October 22, 2021, Metro-North filed a Request for Production of Documents seeking information about the inquiries about freight movements across the Beacon Line that HRRC allegedly had received since Metro-North acquired the Beacon Line, as well as information about alleged current and future freight opportunities for HRRC on the Line.

Despite its prior representations in this proceeding, HRRC objected to the request. *Housatonic Railroad’s Objection to Request by Metro-North Commuter Railroad Company for Production of Documents / Motion for Protective Conditions*, AB 1311, at p. 2 (filed Nov. 11, 2021). On December 2, 2021, Metro-North filed a Motion to Compel Production of Documents. Following a meet-and-confer with Administrative Law Judge Thomas McCarthy, HRRC submitted its responses to the Request for Production of Documents on January 7, 2022.

On February 9, 2022, counsel for Metro-North sent correspondence to the Board to confirm that all discovery disputes had been resolved and the matter was ready to proceed to the next phase.

On February 13, 2022, counsel for HRRC indicated in a letter that the transcript from the Melillo deposition needed to be finalized and approved by Mr. Melillo but did not identify any plans to seek further discovery. In the same letter, counsel for HRRC sought a medical extension to the abeyance of the proceedings until at least March 1, 2022. However, on March 17, 2022, HRRC submitted a Request for Production of Documents and a Request to Correct and Update Responses to Interrogatories, threatening to further delay the proceedings. Copies of those documents are attached to this Motion as **Exhibit 1** and **Exhibit 2**, respectively.

ARGUMENT

A. Discovery Only Includes Documents “Relevant to the Subject Matter Involved in a Proceeding” and the Documents Requested by HRRC are Not Relevant

Pursuant to 49 C.F.R. § 1114.21(a)(1), discovery in abandonment proceedings covers only matters “relevant to the subject matter involved in a proceeding. . . .” The Board defines relevance to mean information capable of affecting the outcome of the proceeding. *CSX Transportation, Inc. and Del. And Hudson Ry. Co., Inc.—Joint Use Agreement, Motion to Compel*, FD 35348, slip op. at 3 (STB served Aug. 16, 2010) (citing 49 C.F.R. § 1114.21). “[P]arties seeking discovery in abandonments and discontinuances must demonstrate relevance and need.” *Delaware and Hudson Ry. Co., Inc.—Discontinuance of Trackage Rights Exemption—In Broome Cty.; Middlesex, Essex, Union, Somerset, Hunterdon, and Warren Counties, N.J.; Cumberland, Chester, Luzerne, Perry, York, Lancaster, Northampton, Lehigh, Carbon, Berks, Montgomery, Northumberland, Dauphin, Lebanon, and Philadelphia Counties, Pa.; Cecil, Harford, Baltimore, Anne Arundel, and Prince George’s Counties, and Baltimore City, Md.; the District of Columbia; and Arlington County, and the City of Alexandria, Va.*, STB Docket No. AB 156 (Sub-No. 27X), slip op. at 2 (STB Service Date Aug. 10, 2015) (“*Delaware and Hudson*”). “In particular, ‘[t]he nature of abandonment cases and the need to decide them promptly have led us to require that discovery requests be sharply

focused and clearly justified.’” *Id.* (quoting *Cent. R.R. of Ind.--Aban. Exemption--in Dearborn, Decatur, Franklin, Ripley, & Shelby Cntys., Ind.*, AB 459 (Sub- No. 2X), slip op. at 4 (STB served Apr. 1, 1998)).

HRRC’s Request for Production of Documents seeks correspondence and documentation involving Metro-North and the Board, the Federal Railroad Administration, Putnam County, Dutchess County, the State of New York, and “any trail group” related to “any trail use on any portion of the Beacon Line” or “related in any way to trail use on the Beacon Line.” The Request to Correct and Update Responses to Interrogatories seeks updated responses to interrogatories already answered by Metro-North including those related to trail use and other considerations unrelated to the impacts the abandonment would have on public convenience and necessity. The materials requested might be relevant to Metro-North’s plans for a trail on the subject corridor but bear no relevance to the question whether the public convenience and necessity warrant the abandonment of the line. 49 U.S.C. § 10903(d).

The core issue in an Adverse Discontinuance Case such as this is “whether the present or future public convenience and necessity require or permit the proposed discontinuance.” *Port of Benton County, Wash.—Adverse Discontinuance of Rail Service—Tri-City R.R. Co., LLC*, STB Docket No. AB 1270, slip op. at 4 (STB served October 31, 2019) (citing 49 U.S.C. § 10903(d)). The documents and responses to interrogatories requested by HRRC pertain to plans for future use of the Beacon Line as a trail should the abandonment go forward. Such information has no bearing on the central question of whether discontinuance of the Line would impair public convenience and necessity by denying freight opportunities. That determination is limited to consideration of the use of the Line as it currently exists and what impacts on freight activities would result if the abandonment occurred. Theoretical future use of the Line post-abandonment as a trail lacks

relevance and has no possibility of impacting the Board's decision regarding the adverse discontinuance.¹

HRRC has failed to “demonstrate relevance and need” for the information in these requests. *Delaware and Hudson*, slip op. at 2. In the absence of a “sharply focused and clearly justified” discovery request explaining the connection between this information and the public convenience and necessity determination, the abandonment proceedings must be allowed to proceed “promptly” without further discovery. *Id.* Given that HRRC's broad requests for discovery fall outside the scope of what is allowed under the Board's regulations, Metro-North should not be required to respond.

B. Protective Orders Are Appropriate to Protect Against Untimely and Irrelevant Discovery Requests that Threaten Undue Burden to the Disclosing Party and Further Delay of the Proceedings

Board regulations allow protective orders to avoid “undue burden or expense” or “to prevent the raising of issues untimely or inappropriate to the proceeding.” 49 C.F.R. § 1114.21(c). The Board is authorized to provide relief from untimely, inappropriate, and unduly burdensome requests by ordering that “the discovery not be had.” *Id.* § 1114.21(c)(1). “Under 49 CFR § 1114.21(c) . . . discovery may be denied if it would be unduly burdensome in relation to the likely value of the information sought.” *Tongue River R.R. Co., Inc.—Rail Construction and Operation—In Custer, Powder River and Rosebud Counties, Mont.*, STB Docket No. 30186, slip op. at 4 (STB served Sept. 9, 2014).

Given that Metro-North and HRRC have already conducted extensive discovery, it is untenable for HRRC to belatedly request potentially voluminous additional documents and information at this late stage, especially considering that HRRC's requests lack relevance to the

¹ Metro-North has not hidden its intent to seek authority to railbank this line and to comply with the Board's regulations at 49 C.F.R. 1152.29.

proceeding. The inclusion in HRRC's Request for Production of Documents of correspondence and documentation relating to Metro-North's interactions with numerous federal, state, local, and private actors concerning a trail presents a major burden to Metro-North with no possible impact on the outcome of this proceeding. And even though Metro-North responded to HRRC's initial Request for Responses to Interrogatories on June 9, 2021, HRRC seeks updated responses. HRRC's insistence on updates to Metro-North's responses to interrogatories without a targeted explanation as to why corrections are necessary promises to waste time and resources with duplicative information with no benefit to the Board's decision-making process, especially since HRRC conducted a deposition of Metro-North's witness after the Interrogatory answers were served and had ample opportunity to obtain any necessary, relevant updates. Metro-North is well aware of its continuing obligations regarding discovery, and will comply with this obligation if and when necessary.

Therefore, the discovery requested is unduly burdensome when considered in relation to the redundant and irrelevant information being sought and the Board should issue a Protective Order excusing Metro-North from responding to HRRC's discovery requests. *Tongue River R.R. Co., Inc.—Rail Construction and Operation—In Custer, Powder River and Rosebud Counties, Mont.*, STB Docket No. 30186, slip op. at 4 (STB served Sept. 9, 2014).

CONCLUSION

For the foregoing reasons, the Metro-North hereby requests the Board issue a Protective Order excusing Metro-North from responding to HRRC's Request for Production of Documents and Request to Correct and Update Responses to Interrogatories. Metro-North further repeats its request to remove this proceeding from abeyance and require HRRC to respond to the Application. Eleven (11) months have passed and Metro-North asks this Board to put a stop to HRRC's

continued efforts to interpose delay on this proceeding. Metro-North will be filing a proposed procedural schedule on April 14 as required by this Board's order dated March 25, 2022.

Respectfully submitted,



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Dated: April 13, 2022

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of April 2022, I caused the foregoing Motion of Metro-North Commuter Railroad Company For Protective Order to be served on the following parties by email:

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Vice President and General Counsel
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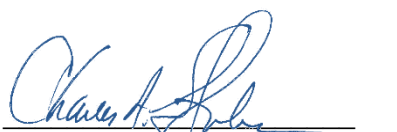
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Charles A. Spitulnik

EXHIBIT 1

HRRC Request for Production of Documents (March 17, 2022)

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Docket No. AB 1311

**METRO-NORTH COMMUTER RAILROAD COMPANY – ADVERSE
DISCONTINUANCE OF TRACKAGE RIGHTS – HOUSATONIC RAILROAD
COMPANY**

**REQUEST FOR PRODUCTION OF DOCUMENTS
BY HOUSATONIC RAILROAD COMPANY
TO
METRO-NORTH COMMUTER RAILROAD COMPANY**

March 17, 2022

Pursuant to the Surface Transportation Board’s (“STB”) rules governing discovery, *see* 49 C.F.R. Part 1114, and in accordance with the instructions set forth herein, Housatonic Railroad Company (“Housatonic”), by its undersigned counsel, propounds the following Request for Production of Documents to be produced by the Metro-North Commuter Railroad Company. Pursuant to 49 C.F.R. § 1114.30(b), Housatonic requests that these documents be produced within 21 days after the date of service hereof to undersigned counsel for Housatonic.

INSTRUCTIONS

1. If any Request for Production herein cannot be responded to or complied with in full, it shall be responded to or complied with to the extent possible with an explanation as to why full compliance is not possible.

2. Each paragraph and subparagraph of a Request for Production shall be construed independently and no other paragraph or subparagraph shall be referred to or relied on for the purpose of limiting its scope.

3. In answering these Requests for Production, you are required to furnish under oath all information in your possession, custody or control, even if the information is in the possession of third parties.

4. If in answering these Requests for Production, you claim any ambiguity in interpreting the Request for Production, or a definition or instruction applicable thereto, such claim shall not be a basis for refusing to respond, but there shall be set forth as part of the response the language deemed to be ambiguous and the interpretation chosen or used in responding to the Request for Production.

5. These Requests for Production are continuing in nature. Any information obtained subsequent to the service of answers to these Requests for Production that would have been included in the answers had the information had been known shall promptly be supplied by supplemental answers whenever you find, locate, acquire or become aware of such information. Supplemental answers are to be served as soon as reasonably possible after receipt of such information.

6. If a claim of privilege (including, but not limited to, the work-product privilege) is asserted in objecting to any means of discovery or disclosure, you shall comply with the requirements of 49 C.F.R. Part 1114, and identify with respect to the information: (i) the general nature of the information withheld; and (ii) the specific privilege claimed.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. All correspondence, applications, notifications and other documents submitted to or received from the Surface Transportation Board and related to any trail use on any portion of the Beacon Line. Excluded from this request are any documents filed in connection with Docket Number AB1131, copies of which have already been submitted to Housatonic Railroad Company.
2. All correspondence, applications, notifications and other documents submitted to or received from the Federal Railroad Administration and related to any trail use on any portion of the Beacon Line.
3. Any contracts, leases, licenses or other agreements entered into between Metro-North and any other entity, including but not limited to Putnam County, Dutchess County, any department or agency of the State of New York, and any trail group, which agreements are related in any way to trail use on the Beacon Line.
4. All correspondence between Metro-North and any other entity, including but not limited to Putnam County, Dutchess County, any department or agency of the State of New York, and any trail group, which correspondence is related in any way to trail use on the Beacon Line.
5. All correspondence between Metro-North or its representatives and the following entities and relating to this proceeding (AB1311) and/or future trail use: Dutchess County NY, Open Space Institute, Scenic Hudson, Inc., Parks & Trails New York, Empire State Trail, Hudson River Valley Greenway, City of Beacon NY.

Submitted by:

Edward J Rodriguez
General Counsel
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CERTIFICATE OF SERVICE

I, Edward J. Rodriguez, certify that I have this day, March 17, 2022, served a true and correct copy of the foregoing document by email upon Metro-North Commuter Railroad Company's counsel of record, as listed below.

Charles A. Spitulnik
Kaplan Kirsch & Rockwell
1634 I (Eye) Street NW, Suite 300
Washington, DC 20006
cspitulnik@kaplankirsch.com

and by email to:

Judge Thomas McCarthy
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ctolbert@fmshrc.gov, Zbyers@fmshrc.gov.

/s/ Edward J. Rodriguez

Edward J Rodriguez
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Dated: April 17,2022

EXHIBIT 2

HRRC Request to Correct and Update Responses to Interrogatories (March 17, 2022)

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Docket No. AB 1311

**METRO-NORTH COMMUTER RAILROAD COMPANY – ADVERSE
DISCONTINUANCE OF TRACKAGE RIGHTS – HOUSATONIC RAILROAD
COMPANY**

**REQUEST BY HOUSATONIC RAILROAD COMPANY
TO
METRO-NORTH COMMUTER RAILROAD COMPANY
TO CORRECT AND UPDATE RESPONSES TO INTERROGATORIES**

March 17, 2022

Pursuant to 49 C.F.R. 1114.26 and other applicable authority, Housatonic Railroad Company, Inc. hereby requests Metro-North Commuter Railroad Company to correct and update certain of Metro-North's June 9, 2021 responses to interrogatories of Housatonic Railroad Company dated May 13, 2021 as set forth below. Compliance is requested as soon as practicable but no later than April 8, 2022.

Please correct the Metro-North response dated June 9, 2021 to the following interrogatories if correction is necessary in order to make the initial response accurate and please update the response to reflect any changes between the date of the original responses and the date of the revised responses hereby requested:

Part I – Proposed Abandonment

Interrogatory # 9 - Has Metro North taken any action to date which makes freight operation and provision of common carrier freight service on the Beacon Line impossible or extremely burdensome and impracticable? Without limiting the generality of the foregoing please include any actions which interrupt the continuity of the rail and track, the safe and efficient passage of trains over grade crossings, or any violation of FRA class 1 track standards.

Part II – Current and Proposed Trail Use

Please correct the Metro-North responses dated June 9, 2021 to each of the interrogatories In Part III of Housatonic Railroad's Interrogatories dated May 13, 2021 if correction is necessary in order to make the initial response complete and accurate and please update the response to reflect any changes between the date of the original responses and the date of the revised responses hereby requested.

Submitted by:

Edward J Rodriguez
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CERTIFICATE OF SERVICE

I, Edward J. Rodriguez, certify that I have this day, March 17, 2022, served a true and correct copy of the foregoing document by email upon Metro-North Commuter Railroad Company's counsel of record, as listed below.

Charles A. Spitulnik
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and by email to:

Judge Thomas McCarthy
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/s/ Edward J. Rodriguez

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Dated: April 17,2022