



Brotherhood of Railroad Signalmen

917 Shenandoah Shores Road
Front Royal, VA 22630

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Michael S. Baldwin
President

James M. Finnegan
Secretary-Treasurer

June 13, 2022
(via online at regulations.gov)

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June 16, 2022
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Public Record

Docket Operations Facility
Surface Transportation Board
395 E. Street SW
Washington, D.C. 20423

RE: Docket Number FD 36596, Delaware and Raritan River Railroad, LLC (DRRR)—Lease and Operation Exemption—Consolidated Rail Corporation and New Jersey Transit Corporation.

Comments of the Brotherhood of Railroad Signalmen

The Brotherhood of Railroad Signalmen (BRS) is filing comments concerning the above-referenced document that was printed in the June 3, 2022, Federal Register (Page No. 33868). The BRS is the duly recognized collective bargaining representative for roughly 10,000 Signal employees who are responsible for inspection, installation, construction, repair, and maintenance of all signal systems and highway-rail grade crossings on all Class I railroads and various other Carriers in the United States. Our membership has a vested interest in the aforementioned application of Lease and Operation Exemption which affects the safety of our members, local residents, railroad employees, equipment, and commodities, as well as the environment.

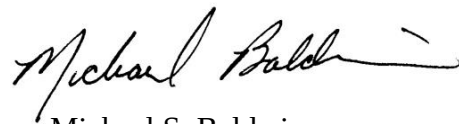
In its request, DRRR, a Class III railroad, seeks to lease several segments of Conrail-owned lines to include (1) the portion of the Freehold Secondary from and including the switch for the east and west legs of the Jamesburg wye and the grade crossing of Gatzmer Avenue in Jamesburg, New Jersey (approximately milepost 5.6), southeast to the end of Conrail's ownership at the west side of Broad Street (approximately milepost 17.1), in Freehold, a total distance of approximately 11.5 route miles; (2) the portion of the Southern Secondary, from the beginning of Conrail's ownership at South Lakewood (approximately milepost 63.0) to the end of Conrail's ownership at Lakehurst, New Jersey (approximately milepost 66.0), a total distance of approximately 3.0 route miles; and (3) the Toms River Industrial Track, from the connection with the Southern Secondary at or near Lakehurst (approximately milepost 65.9 on the Southern Secondary) to the end of Conrail's ownership of regulated main line track near Toms River, New Jersey (approximately milepost 5.0), a total distance of approximately 5.0 route miles.

The Organization objects to DRRR's request to lease Conrail-owned line segments. Currently, the aforementioned territory is maintained by highly-skilled workers who perform scheduled testing on nearly 46 highway grade crossings and six signal locations. The training and experience these individuals possess is instrumental to keep locations in compliance with federal guidelines. The

safety of these locations hinges on highly-skilled Signal workers to perform the necessary inspections which affects the safety of local residents, railroad employees, equipment, and commodities as well as the environment. Additionally, this lease has the immediate potential to affect the individuals that perform the maintenance and repair on the line segments. This comes at a time where the industries' labor forces have been decimated by reduction, and actions like this petition furthers the wound to an already depleted workforce. BRS requests the Surface Transportation Board deny DRRR's Lease and Operation Exemption request in order to maintain the highest level of safety and efficiency on the listed territory.

If you have any questions, please contact my office at 540.622.6525.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Michael Baldwin", with a stylized flourish at the end.

Michael S. Baldwin
President



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(via online at [regulations.gov](https://www.regulations.gov))

RE: FD 36596

To Whom It May Concern,

This is formal notice that the Brotherhood of Railroad Signalmen (BRS) served the Delaware and Raritan River Railroad, LLC (DRRR) representative Robert A. Wimbish, Fletcher & Sippel LLC. The filing was sent on June 13, 2022 and our records indicate the party received our letter on June 15, 2022. The tracking number is 1ZR39536015346066.

If you have any questions, please contact my office at 540.622.6525.

Respectfully Submitted,

A handwritten signature in black ink that reads "Michael Baldwin".

Michael S. Baldwin
President