



Brotherhood of Railroad Signalmen

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

RE: Docket Number FD 36646, R.J. Corman Railroad Group, LLC (RJCG), and R.J. Corman Railroad Company, LLC (RJCRC)—Continuance in Control Exemption—Raleigh and Fayetteville Railroad, LLC (RFCC)

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 November 30, 2022, Federal Register (Page No. 73579). 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 continuance in control regarding the concurrent filing Raleigh and Fayetteville Railroad—Acquisition, Lease and Operation Exemption with Interchange Commitment—Norfolk Southern Railway Company, Docket No. FD 36645, which affects the safety of our members, local residents, railroad employees, equipment, and commodities, as well as the environment.

RJCG and RJCRC filed to continue in control under Docket FD 36645, which states: “*Raleigh and Fayetteville Railroad, LLC (RFCC), a noncarrier, has filed a verified notice of exemption to: (1) acquire approximately 42.38 miles of rail line from Norfolk Southern Railway Company (NSR), (2) lease approximately 19.88 miles of rail line from NSR, and (3) assume NSR’s trackage rights over 0.59 miles of a rail line owned by CSX Transportation, Inc. (CSXT), totaling approximately 62.85 miles, and to operate over those lines, which forms a contiguous line between Raleigh and Fayetteville in Wake, Harnett, and Cumberland Counties, North Carolina.*”

The BRS objects to the collective applicant RJCG and RJCRC request to continue to control the NRS-owned line segments. Currently, the aforementioned territory is maintained by highly skilled workers who perform scheduled testing on nearly 52 highway grade crossings. The training and experience these individuals possess is instrumental in keeping locations in compliance with federal guidelines. The safety of these locations hinges on highly skilled Signal workers performing the necessary inspections which affects the safety of local residents, railroad employees, equipment, and commodities, as well as the environment. Additionally, this acquisition 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 force reduction, and actions like this petition further the wound to an already depleted workforce. BRS requests the Surface Transportation Board deny RJCG and RJCRC the continuance of operation request in order to maintain the highest level of safety and efficiency on the listed territory.

The pleading is served to RFCC's representative Catherine S. Wright, Jackson Kelly PLLC. If you have any questions, please contact my office at 540.622.6525.

Sincerely,

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

Michael S. Baldwin
President