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Office of Proceedings
July 18, 2023
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July 18, 2023

VIA ELECTRONIC FILING

Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E. Street SW
Washington, DC 20423

Re: **Docket No. NOR 42175**
National Railroad Passenger Corporation —
Complaint and Petition for Investigation — Substandard
Performance of Amtrak's *Sunset Limited* Trains No. 1 and 2

New Orleans Public Belt Railroad Response to Appendix A—
Part II Document Requirement

Dear Ms. Brown:

Pursuant to the Board's July 11, 2023 decision in the above-captioned proceeding and its Appendix A "Document Requirement," New Orleans Public Belt Railroad Commission for the Port of New Orleans (NOPB) submits its Response attached as the Appendix to this letter.

This is NOPB's first participation; it was not made a party to the proceeding until last Tuesday. The National Railroad Passenger Corporation (Amtrak) prejudiced any opportunity NOPB had to address the propriety or necessity of an investigation when it declined to serve NOPB with its complaint—even (1) though Amtrak's own evidence revealed NOPB's (limited) role in the *Sunset Limited* route and (2) after Amtrak was specifically apprised of such a NOPB role. *See* July 11, 2023 Decision, 6, 10; January 27, 2023 Reply of Illinois Central Railroad Company (IC), 7-8.¹ That left it to the Board to undertake service of the Amtrak complaint upon NOPB. July 11, 2023 Decision, 10 n.11. Since then, NOPB has worked to come up to speed on this proceeding as quickly as possible.

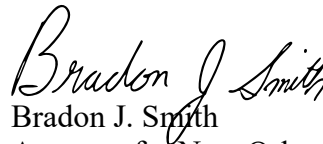
¹ *See also, Application of the National Railroad Passenger Corporation under 49 U.S.C. § 24308(e) — CSX Transportation Inc. and Norfolk Southern Railway Company*, Docket No. FD 36496 (STB served Jan. 28, 2022), 2 (describing Amtrak efforts to deprive publicly-owned terminal switching railroad of party status and ability to present evidence and argument).

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NOPB's involvement with the *Sunset* falls into two categories on two corresponding adjacent segments of track in New Orleans, Louisiana. From Southport Junction to East Bridge Junction, the *Sunset* operates over track the Illinois Central Railroad Company owns and dispatches that NOPB leases and maintains. Within East Bridge Junction and from East Bridge Junction to West Bridge Junction—eponymous points associated with the Huey P. Long Bridge—the *Sunset* uses track which Union Pacific Railroad Company dispatches that NOPB owns and maintains.

Respectfully submitted,



Bradon J. Smith
Attorney for New Orleans Public Belt Railroad
Commission for the Port of New Orleans

BJS:bs

Attachment/Table of Contents Appendix — NOPB Response

cc: Hon. Thomas McCarthy, ALJ
Parties of Record

APPENDIX

DOCUMENT REQUIREMENT APPENDIX A—PART II NEW ORLEANS PUBLIC BELT RESPONSE

Train /Direction	Prefixed Milepost	Station	Description
Train No. 1 Westbound (Read Down)	A-908.7	Southport Junction	IC (NOPB-leased) main track switch connection to New Orleans Union Passenger Terminal (Amtrak); point where <i>Sunset</i> trains exit/enter IC (NOPB-leased) trackage
	A-908.6	Southport Junction	KCS (north-south) diamond crossing
	A-908.6	Southport Junction	Station Milepost
	A-907.5	“Long Crossover”	Switch from IC (NOPB-leased) main track to Lampert Junction and NOPB River Main
	A-906.7	East Bridge Junction	IC (NOPB-leased) main track switch connection to NS “Back Belt” main track
	A-906.5 = B-J3.1	East Bridge Interlocker	IC switch connection from main track; <i>Sunset</i> trains exit/enter IC (NOPB-leased) trackage here
	B-J3.3	East Bridge	Station Milepost
	B-J3.7 to B-J8.1	Huey P. Long Bridge	Beginning/End of HPL Bridge
	B-J8.1	West Bridge Interlocker	Station Milepost
Train No. 2 Eastbound (Read Up)	B-J8.2	West Bridge Interlocker	Switch connection to/from UP lead track to Avondale Yard; <i>Sunset</i> exits/enters UP-dispatched, NOPB-owned track here (see alternate BNSF route, below)
	B-J8.3	Avondale	Switch connection to/from BNSF lead track to Avondale Yard; <i>Sunset</i> exits/enters UP-dispatched, NOPB-owned track here (see alternate UP route, above)