

July 18, 2023

306855

BY E-FILING

ENTERED
Office of Proceedings
July 18, 2023
Part of
Public Record

Ms. Cynthia T. Brown, Chief
Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W., Room 1034
Washington, DC 20423-0001

Re: *Complaint and Petition of the National Railroad Passenger Corp. Under 49 U.S.C. § 24308(f)–For Substandard Performance of Amtrak's Sunset Limited Trains 1 and 2 (Docket No. NOR 42175)*

Dear Ms. Brown:

Attached for filing in the above-referenced docket is the Response of Illinois Central Railroad Company to Appendix A (Part II) Document Requirement – Uniform Stations/Mileposts.

Sincerely,

/s/ David A. Hirsh

David A. Hirsh

Counsel for Illinois Central Railroad Company

Enclosure

cc: All Parties of Record

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. NOR 42175

COMPLAINT AND PETITION OF THE NATIONAL RAILROAD PASSENGER CORP.
UNDER 49 U.S.C. § 24308(f) – FOR SUBSTANDARD PERFORMANCE OF SUNSET
LIMITED TRAINS 1 AND 2

**RESPONSE OF ILLINOIS CENTRAL RAILROAD COMPANY TO
APPENDIX A (PART II) DOCUMENT REQUIREMENT –
UNIFORM STATIONS/MILEPOSTS**

Kathryn J. Gainey
CN
975 F Street, N.W., Suite 550
Washington, DC 20004
kathryn.gainey@cn.ca

David A. Hirsh
Theodore L. Hunt
Shannon Y. Shin
DENTONS US LLP
1900 K Street, N.W.
Washington, DC 20006
(202) 496-7500
david.hirsh@dentons.com

Attorneys for Illinois Central Railroad Company

July 18, 2023

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. NOR 42175

COMPLAINT AND PETITION OF THE NATIONAL RAILROAD PASSENGER CORP.
UNDER 49 U.S.C. § 24308(f) – FOR SUBSTANDARD PERFORMANCE OF SUNSET
LIMITED TRAINS 1 AND 2

**RESPONSE OF ILLINOIS CENTRAL RAILROAD COMPANY TO
APPENDIX A (PART II) DOCUMENT REQUIREMENT –
UNIFORM STATIONS/MILEPOSTS**

Illinois Central Railroad Company (“CN”)¹ hereby responds to the Document Requirement for All Parties (Part II of Appendix A of the decision served by the Board in this proceeding on July 11, 2023) as follows:

1. **Uniform stations/mileposts.** Produce a list of all stations (as defined in Part I of this appendix) on the Sunset Limited that you hosted, owned, operated, dispatched, served, or leased. This list should identify each station with a milepost number that incorporates a prefix from the “Alpha Milepost Series Designators” table below. Any answer or document produced in this proceeding that references a location should conform to this uniform milepost standard, unless stated otherwise. In other words, if multiple parties all refer to the same milepost number, that location will be identical in its actual location. This does not apply to documents where a location is given for a generic purpose such as a training guide or standard operating procedure.

Alpha Milepost Series Designators		
Railroad(s)	Station Range	Prefix
NOPB, CN, Amtrak	New Orleans Station to East Bridge Jct.	A
UP, BNSF, NOPB	East Bridge Jct. to Live Oak	B
BNSF	Live Oak to Iowa Jct.	C
UP	Beaumont to Houston via Gulf Coast Jct.	D
UP	UP Iowa Jct. to Houston	E

¹ Acronyms not otherwise defined have the meanings given in the Board’s decision served July 11, 2023.

UP	Houston to El Paso	F
UP	El Paso to Los Angeles	G
SCRRA	Los Angeles Union Station	H

Response:

The only track “owned, operated, dispatched, served, or leased” by CN on the track used by Amtrak’s Sunset Limited trains between New Orleans Station and East Bridge Junction lies between Southport Junction and East Bridge Junction.² The following table lists all “stations” (as defined by the Board in Part I of Appendix A), with their milepost numbers (including the prefix of “A” as directed by the Board), on or between those points. For completeness, the table includes (without the prefix “A”) three points that are not themselves part of the Sunset Limited route, but share the name of either “East Bridge Junction” or “Southport Junction.”

Milepost	“Station”	Description
906.1	East Bridge Junction	North end of East Bridge Junction Interlocking and beginning of NOPB Lease at Central Avenue (UP dispatched)
906.4	East Bridge Junction	Official milepost of timetable station
A906.5	East Bridge Junction	Connection switch between NOPB and CN (NOPB-leased) main track; point where Sunset Limited trains enter/exit CN (NOPB-leased) trackage (UP dispatched)
A906.7	East Bridge Junction	CN (NOPB-leased) main track connection switch to NS Back Belt main track (UP dispatched)

² CN is not a host for Amtrak’s Sunset Limited service. See CN’s Response to Amtrak’s Complaint and Proposed Procedures at 8-9 (Jan. 27, 2023). Amtrak operates between Southport Junction and East Bridge Junction via UP trackage rights. *Id.* As explained in CN’s filing, CN has leased the track between Southport Junction and East Bridge Junction to NOPB.

A907.5	“Long Crossover”	Switch between CN (NOPB-leased) main track and route to both Lampert Junction and the NOPB River Main (CN dispatched)
A908.6	Southport Junction	Official milepost of timetable station
A908.6	Southport Junction	CPKC (“Canadian Pacific Kansas City”) diamond (CN dispatched)
A908.7	Southport Junction	Connection switch between CN (NOPB-leased) main track and Amtrak NOUPT (“New Orleans Union Passenger Terminal”) main track; point where Sunset Limited trains enter/exit CN (NOPB-leased) trackage (CN dispatched)
908.8	Southport Junction	End of CN (NOPB-leased) main track

Respectfully submitted,

/s/ David A. Hirsh

Kathryn J. Gainey
CN
975 F Street, N.W., Suite 550
Washington, DC 20004
kathryn.gainey@cn.ca

David A. Hirsh
Theodore L. Hunt
Shannon Y. Shin
DENTONS US LLP
1900 K Street, N.W.
Washington, DC 20006
(202) 496-7500
david.hirsh@dentons.com

Attorneys for Illinois Central Railroad Company

July 18, 2023

VERIFICATION

I, Michael A. Matteucci, certify under penalties of perjury that I am Senior Director – Interline Services for Canadian National Railway Company and its U.S. rail carrier subsidiaries, including Illinois Central Railroad Company, that I have read the foregoing Response of Illinois Central Railroad Company Response to Appendix A (Part II) Document Requirement – Uniform Stations/Mileposts, and that the facts stated therein are true and correct. I further declare under penalties of perjury that I am qualified and authorized to make this certification on behalf of Illinois Central Railroad Company and its affiliates.



Michael A. Matteucci

Executed on July 18, 2023

CERTIFICATE OF SERVICE

I, James M. Guinivan, hereby certify that I have, this 18th day of July, 2023, caused the foregoing Response of Illinois Central Railroad Company Response to Appendix A (Part II) Document Requirement – Uniform Stations/Mileposts to be served by email upon all parties of record.

/s/ James M. Guinivan
James M. Guinivan