



Brotherhood of Railroad Signalmen

917 Shenandoah Shores Road
Front Royal, VA 22630

Phone: (540) 622-6522
Fax: (540) 622-6532

Michael S. Baldwin
President

James M. Finnegan
Secretary-Treasurer

307623

ENTERED
Office of Proceedings
December 11, 2023
Part of
Public Record

December 11, 2023
(via online at stb.gov)

Docket Operations Facility
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

RE: Docket Number FD 36732 Canadian Pacific Kansas City Limited and The Kansas City Southern Railway Company, d/b/a CPKC—Acquisition and Operation—Certain Rail Line of Meridian & Bigbee Railroad, L.L.C.

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 9, 2023, Federal Register (Page No. 77409). 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 acquisition which affects the safety of our members, local residents, railroad employees, equipment, and commodities, as well as the environment.

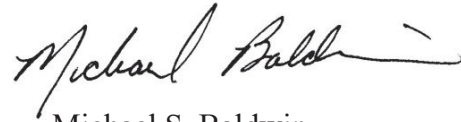
“Canadian Pacific Kansas City Limited (CPKCL), a noncarrier, on behalf of itself and its wholly owned subsidiary, The Kansas City Southern Railway Company (KCS) d/b/a CPKC (collectively, Applicants). The Application seeks Board approval for KCS, a Class I rail carrier, to acquire from Meridian & Bigbee Railroad, L.L.C. (MNBR), a Class III rail carrier, and to operate approximately 50.4 route miles of rail line between Meridian, Miss., and Myrtlewood, Ala.”

While the BRS does not oppose CPKC’s acquisition of MNBR, there are considerations bound to transitioning a Class III railroad to a Class I. As per the Federal Railroad Administration (FRA) Public Grade Crossing Inventory, maintenance of multiple crossings along this line is required. CPKC’s filing lacks clarification on its strategy for sustaining current assets. Moreover, the intended upgrade from Class III to Class I necessitates highly skilled personnel capable of conducting routine testing on existing assets and those CPKC intends to add. Although the BRS acknowledges this is outside of this agency’s jurisdiction, it is important to highlight these concerns for the record. It would be wise for CPKC to provide a comprehensive plan addressing the need for additional workers beyond those mentioned in its filing. Furthermore, the absence of a detailed plan from CPKC regarding asset maintenance and workforce expansion could have disastrous implications. Inadequate preparation could lead to operational disruptions, safety concerns at crossings, and potentially hinder the transition to a Class I status. Conversely, a comprehensive strategy outlining maintenance protocols and an adequate workforce could not only ensure the continued efficiency of the line but also enhance safety measures. CPKC must recognize the significance of addressing these

aspects transparently, not just for compliance but for the long-term sustainability and success of the transition.

BRS extends its gratitude for the opportunity to provide comments on the acquisition. 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

Cc: All parties of record