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307755

January 3, 2024

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

ENTERED
Office of Proceedings
January 3, 2024
Part of
Public Record

Re: *STB Docket No. FD 36472, CSX Corporation and CSX Transportation, Inc. et al-Control and Merger- Pan Am Systems, Inc. Pan Am Railways Inc. Boston and Maine Corporation, Maine Central Railroad Company, Northern Railroad, Pan Am Southern LLC, Portland Terminal Company, Springfield Terminal Railway Company, Stony Brook Railroad Company, and Vermont and Massachusetts Railroad Company*
Request for Protest/Opposition Statement- CSX Transportation Inc.- Third Annual Report.

Dear Ms. Brown:

The reason for this letter is request to submit materials related to the above referenced report within this finance docket.

Historical Precedence.

My protest/opposition statement is under the following:

II. Truck to Rail Conversions on the CSX line. Subject to this proceeding it states: "These are movements where improvements in the efficiency of rail transportation are likely to result in shifts in traffic from trucks to rail. Commodities were identified." **REDACTED.**

I believe this entire stated and heavily redacted conversion(s) by CSX is directly impacted by the both the corporate history of its predecessor and actual market conditions that exist in New England.

The attached history from 1984 shows that that a truck to rail conversion has already been attempted.

Cynthia T. Brown
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Termed the "*East Wind*" this was a dedicated intermodal attempt to convert truck to rail. (*see attached*). Its my understanding that the service didn't last two years and that rail was never in a competitive market position against trucking in the haulage of freight.

Even if the heavily redacted CSX truck to rail conversion document(s) contains advanced strategies in corporate finance and computational mathematics, I don't believe it is possible to either change history or the reality that in New England most of its industrial base and rail traffic potential has departed the region.

Attachments

Sincerely

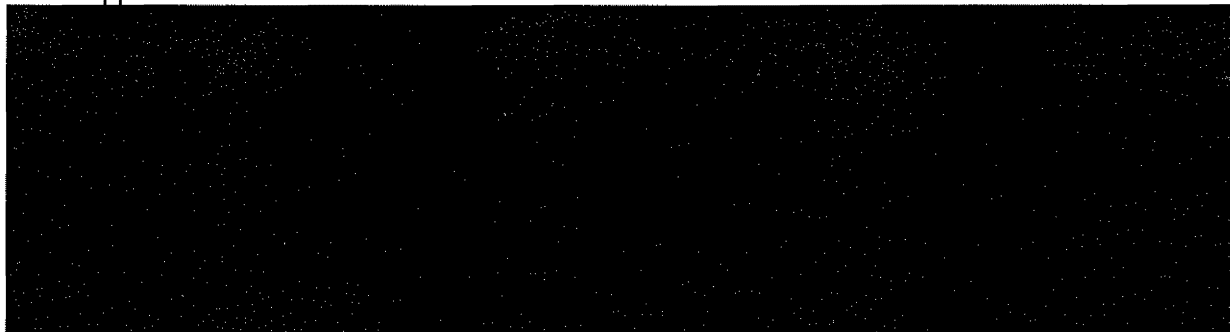
Steven Connolly

Steven Connolly

cc. Parties of Record.

(December 2021 to May 2022) compared to longer-haul movements of those same commodities in the first, second, and third six-month periods after the transaction.

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A few observations can be made based on the data in this table. First, as in the first and second biannual reports, traffic changes in {{[REDACTED]}} appear to reflect significant truck-to-rail diversions. As CSX previously explained, the {{[REDACTED]}}

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

² The carload figures in this column differ slightly from the carloads set out in the second biannual report for this six-month period due primarily to two factors. First, as noted in footnote no. 2 to the second biannual report, the carload data for Dec. 2022-May 2023 were based in part on projections for the last month of the period, whereas the data in the table above are actuals. *See* CSXT/PAR-59 at 5, n.2. Second, during this time period, carload and waybill data maintained previously by Springfield Terminal were converted to CSX databases, resulting in some changes in the way historical data are maintained. In addition, in preparing this report, we determined that the carload value for {{[REDACTED]}} in the second biannual report for the December 2022 to May 2023 period was overstated as a result of a calculation error, and the correct actual figure is presented above.

³ As noted in footnote no. 2 above, these carload data are based in part on extrapolations. In particular, we used actual carload volumes from June 1, 2023 to November 19, 2023, and projected carload volumes from November 20 to November 30, 2023. We used a similar method in the first and second biannual reports.

⁴ As explained in the first and second biannual reports, {{[REDACTED]}}. *See* CSXT/PAR-58 at 6 n.3; CSXT/PAR-59 at 5, n.3.

⁵ The first biannual report excluded traffic volume figures related to {{[REDACTED]}} because of the seasonality of {{[REDACTED]}} movements. Now that we have full-year volume figures for that commodity, we have presented the figures in the second and third biannual reports.

More Than Empty Rhetoric — The East Wind

The "East Wind" with several loaded trailers out of Bangor, Maine on its way to New Haven, Connecticut is powered by one of Guilford's locomotives. Photo by Francis J. DiFalco.

Several months ago, Ernie Phillips, the General Chairman (C-T) of the United Transportation Union on Maine Central properties, cornered Dave Fink, Maine Central President, in the office corridor. He said that the Railroad should do something to get freight now moving over the highways onto rail. Fink agreed and challenged the UTU to work with the railroads to accomplish that goal.

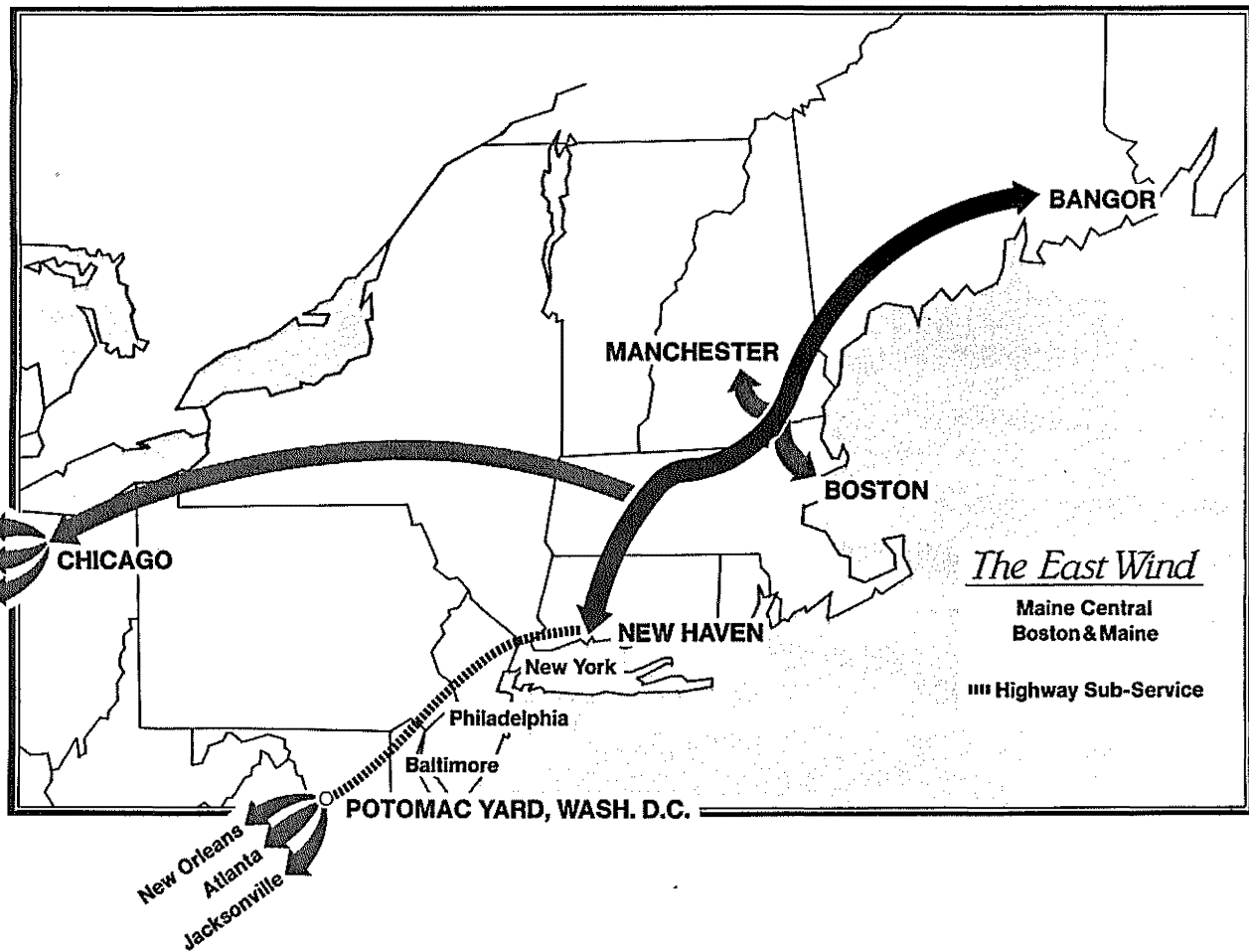
Phillips also serves as labor co-director of the New England Labor/Management Task Force. He went out immediately in his Task Force capacity and started talking with UTU local chairmen and rank and file employees. Within a few days he asked for a meeting with Maine Central management. The result is that today traffic is being diverted from highway to rail and a new and exciting intermodal service has been initiated which is proving quite successful.

The East Wind is a dedicated TOFC (trailer-on-flatcar) train operating 6 days a week between Bangor, Maine and New Haven, Connecticut. Operated over Maine Central and Boston and Maine, the train is designed to provide customer-oriented rail service that is fast, reliable and price and service-competitive.

The East Wind is price-competitive because of an agreement between Maine Central labor and management that provides for reduced train crews for this new service. The train is also able to pick up and set off cars en route without the usual delay of using yard crews. All of this translates into lower cost and better service to the customer.

The East Wind is given passenger train priority over the entire route, adhering to a strict schedule providing dependability and reduced transit time.





TRAIN YOUR TRUCKS

FOR EFFICIENT - RELIABLE - ECONOMICAL INTERMODAL SERVICE

THE "EAST WIND"
EXPRESS PIGGYBACK SERVICE

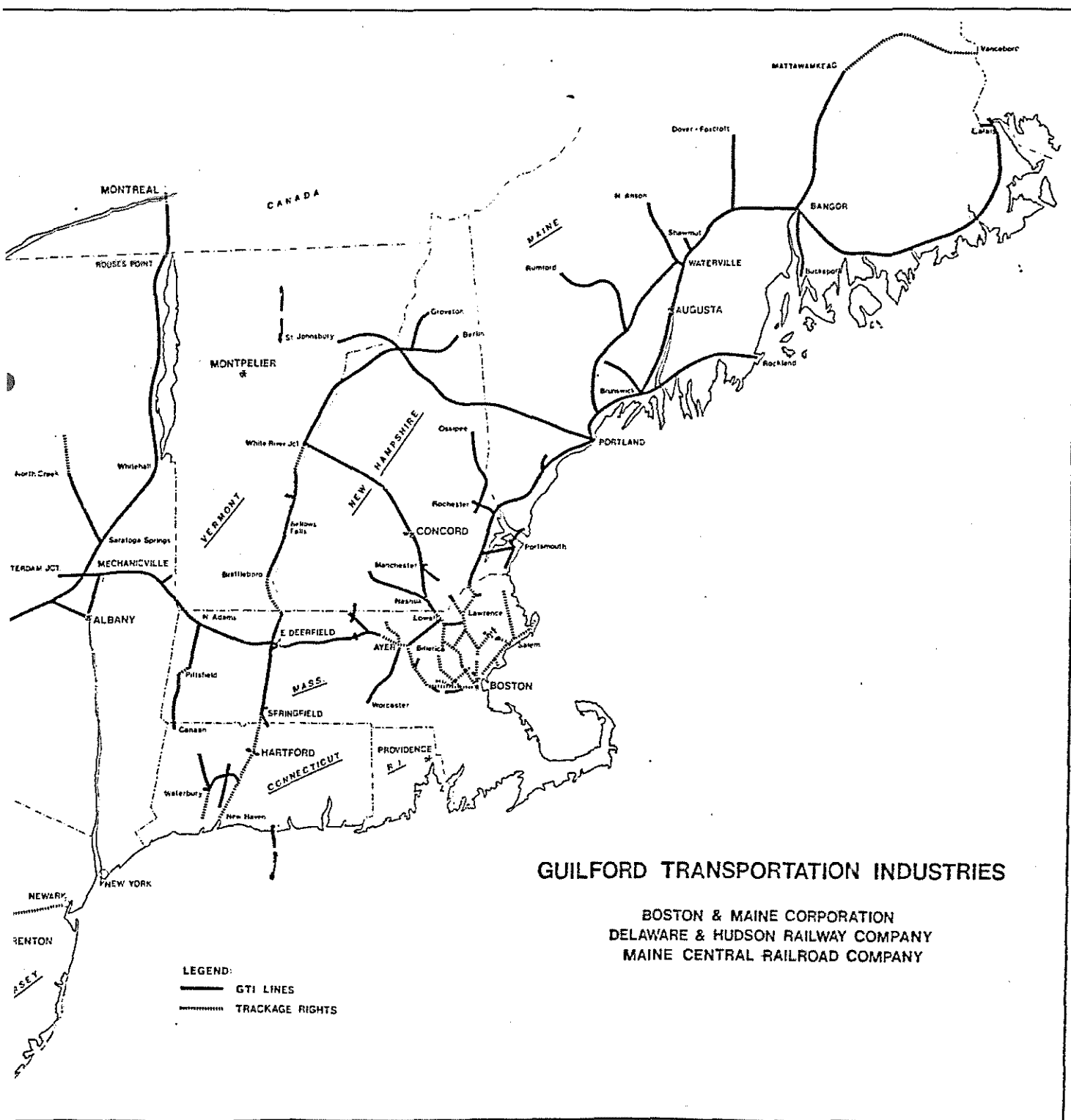
MAINE CENTRAL RAILROAD COMPANY
BOSTON AND MAINE CORPORATION

GUILFORD TRANSPORTATION INDUSTRIES COMPANIES

"EAST WIND"
LV BANGOR
WATERVILLE
PORTLAND
ARV NEW HAVEN *
*SERVING NEW YORK AND ALL
POINTS SOUTH

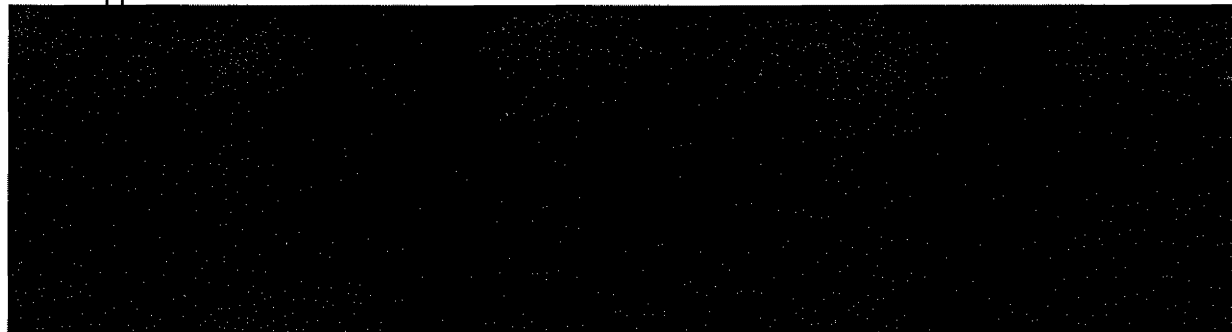
CONNECTING SERVICE PROVIDES
SECOND MORNING DELIVERY TO
CHICAGO VIA SPRINGFIELD

"EAST WIND"
LV NEW HAVEN
PORTLAND
WATERVILLE
ARV BANGOR



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