



Brotherhood of Railroad Signalmen

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Michael S. Baldwin
President

James M. Finnegan
Secretary-Treasurer

May 8, 2024
(via online at stb.gov)

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Office of Proceedings

May 8, 2024

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Public Record

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

RE: Docket FD 36766, East Ohio Valley Railway, LLC—Lease and Operation Exemption
Containing Interchange Commitment—Norfolk Southern Railway Company

Comments of the Brotherhood of Railroad Signalmen

The Brotherhood of Railroad Signalmen (BRS) is filing comments concerning the above-referenced docket that was printed in the May 2, 2024, Federal Register (Page No. 35920). 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.

“East Ohio Valley Railway LLC (EOVR), a Class III rail carrier, has filed a verified notice of exemption...to lease from Norfolk Southern Railway (NSR) and operate a line of railroad with two segments: (1) approximately 16.5 miles between RO 44.0 near Bellaire, Ohio, and RO 60.5 near Powhatan Point, Ohio; and (2) 1.78 miles of rail between OP 0.0 and OP 1.78 near Powhatan Point.”

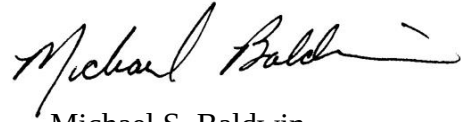
The BRS acknowledges EOVR’s lease and operation of Norfolk Southern-owned line segments without opposition. Currently, these segments are maintained by highly skilled workers who perform scheduled testing, maintenance, and repairs on two remote-operated switches. The expertise of these individuals is crucial for ensuring compliance with federal guidelines and maintaining the safety of the locations. Specifically, the safety of local residents, railroad personnel, equipment, commodities, and the environment relies on the thorough inspections conducted by these skilled Signal workers. However, we are compelled to emphasize our opposition to the loss of work and duly note it for the record.

While the current arrangement of maintenance and testing assets does not directly harm our membership, the BRS feels it’s necessary to address potential concerns regarding future transactions that could result in job losses. The labor force has already suffered significant reductions, and actions such as this petition could exacerbate the strain on an already diminished workforce. The BRS acknowledges that not all transactions guarantee employment protection.

Nevertheless, we strongly urge the Surface Transportation Board to recognize that each divested portion of railroad assets bears the potential to adversely affect the workforce, perhaps not immediately, but certainly in the future.

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