



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

309168

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Public Record

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

RE: Docket Number FD 36818, Central Oregon and Pacific—Lease and Operation Exemption
with Interchange Commitment—Union Pacific Railroad Company

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 December 26, 2024, Federal Register (Page Nos. 105173 105174). 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, quoted below in part, which affects the safety of our members, local residents, railroad employees, equipment, and commodities, as well as the environment.

“Central Oregon & Pacific Railroad, Inc. (CORP), a Class III rail carrier, has filed a verified notice of exemption pursuant to 49 CFR 1150.41 to lease from Union Pacific Railroad Company (UP) and operate the (1) Brooklyn Subdivision from milepost 616 to milepost 660.58; (2) the Springfield and Marcola Industrial Leads from milepost 646.58 to milepost 648.39 in Springfield, Or.; and (3) the Coos Bay Industrial Lead from milepost 648.2 to milepost 652.11 in Eugene, Or., totaling approximately 27.58 miles.”

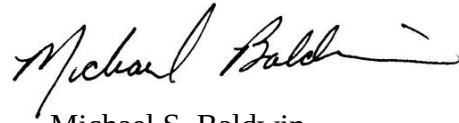
The BRS engaged in discussions with Union Pacific management upon learning of this transaction’s posting in the Federal Register. During these conversations, Union Pacific (UP) assured the BRS that the acquisition would have no impact on BRS personnel. However, unlike other labor unions that were formally notified, the BRS did not receive advance notice. This transaction involves ten highway-rail grade crossings, and we firmly believe we should have been included in the notification process. The BRS ultimately became aware of this loss on January 31, 2025. Currently, these segments are maintained by highly skilled workers who perform scheduled testing, maintenance, and repairs on the highway-rail grade crossings. 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 lack of notification and express our opposition to the loss of work and duly note it for the record.

While the current arrangement of maintenance and testing may not directly harm our membership, the BRS feels it is 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 protections. 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