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Office of Chief Counsel
April 13, 2026
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Public Record

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April 13, 2026

VIA E-FILING

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

**Re: STB Docket No. FD 36909, TransloadX Railroad Company, Inc.—
Acquisition and Operation Exemption—CSX Transportation, Inc.**

Dear Chief of Case Administration:

CSX Transportation, Inc. (“CSXT”) submits this limited response to the filings submitted by Cumberland & Knox Railroad (“C&K”) and The Brotherhood of Railroad Signalmen (“BRS”) in the above-referenced Surface Transportation Board (“STB”) proceeding on April 9, 2026. C&K and BRS made certain misstatements of fact and law in their respective filings, and CSXT is submitting this response to correct the record.

First, with respect to BRS’s statements concerning labor, the Board cannot impose labor protective conditions on transactions under 49 U.S.C. § 10901. *See* 49 U.S.C. § 10901(c). That said, CSXT does not expect that any of its employees will be adversely affected by the transaction proposed by TransloadX Railroad Company, Inc. (“TransloadX-RR”) in FD 36909. Furthermore, the STB’s approval of the CSX/Pan Am merger was and remains subject to *New York Dock* employee protective conditions and certain other representations made by CSXT. *See CSX Corp.—Control & Merger—Pan Am Systems, Inc. (CSX/Pan Am)*, FD 36472, slip op. at 52 (STB served Apr. 14, 2022). Thus, there is no need for the STB to take any further action related to labor in connection with the TransloadX-RR transaction.

Second, contrary to unsupported assertions made by C&K and BRS, CSXT has adhered to the commitments and representations it made in *CSX/Pan Am* related to capital improvements. Since consummation of the merger, CSXT has devoted substantial resources to upgrading the PAR System infrastructure and has completed significant capital improvement projects in Maine and throughout the

former PAR System. For example, as CSXT reported in its Fifth Biannual Report, filed on November 27, 2024, in FD 36472, CSXT has completed significant trackwork on the main line between Waterville, ME (WAT 113.0) and Royal Jct., ME (WAT 184.7). CSXT has replaced approximately 35 track miles of rail, replaced 26 switches, and installed 36 new track panels at road crossings over this segment. Additionally, CSXT has completed staging new rail on the Hinkley Branch between Waterville, ME (WVL 0.0) and Shawmut, ME (WVL 9.0). At Wells, ME, CSXT has completed construction of a six-mile long second main track. CSXT has replaced approximately six track miles of rail and installed two new crossovers, one new switch, and two new control points over this segment.

CSXT did not make any specific commitments regarding capital improvements on the two line segments that are the subject of TransloadX-RR's notice of exemption.¹ Nonetheless, CSXT has completed improvements on these lines. Specifically, CSXT's investments on the Augusta Branch include a significant bridge investment to fortify abutments, improve decking, and address other super- and sub-structure matters, along with spot tie and surfacing improvements. CSXT has also completed spot tie and surfacing work on the Bucksport Branch and determined that the line was sufficient to provide safe and efficient service.

Please contact me with any questions.

Respectfully submitted,

/s/ Peter W. Denton

Peter W. Denton

Attorney for CSX Transportation, Inc.

¹ TransloadX-RR is seeking to lease and operate two lines of railroad from CSXT, consisting of: (1) approximately 18.3 miles of CSXT's Augusta Branch, which extends from Waterville, Me. (MP WVT 0.7), to Augusta, Me. (MP WVT 19.0) in Kennebec County, Me., and (2) approximately 18.8 miles of CSXT's Bucksport Branch, which extends from Bangor, Me. (MP WVB 0.2), to Bucksport, Me. (MP WVB 19.0), in Penobscot and Hancock Counties, Me.

CERTIFICATE OF SERVICE

I hereby certify that I have caused this Letter in Docket No. FD 36909 to be served electronically or by first class mail, postage pre-paid, on all parties of record in this proceeding.

/s/ Sally Mordi

Sally Mordi

Attorney for CSX Transportation, Inc.

April 13, 2026