



Brotherhood of Railroad Signalmen

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

CSX Transportation (CSX) has represented that the Augusta and Bucksport Branches are “*sufficient to provide safe and efficient service.*” That statement is directly contradicted by firsthand observations from the General Chairman of the BRS’CSXT Northern General Committee, who has direct knowledge of the condition and operation of these lines.

On the Augusta Branch, the main “improvement” appears tied to derailment-related repairs. That work was necessary to restore service, not an investment to improve or develop the line. On the Bucksport Branch, only the first portion, roughly five miles, can be considered barely serviceable at best. Beyond that point, the line shows serious deterioration, including washouts, blocked track, disconnected rail, and paved-over highway-rail grade crossings.

From a signal and crossing standpoint, these are not minor issues, they are conditions that prevent safe and lawful operation. Many of these crossings would not pass required FRA inspection and testing today. Missing components, lack of maintained circuitry, and long-term out-of-service conditions make them non-operational without significant repair. These conditions do not match CSX’s claim that the lines are “*sufficient to provide safe and efficient service.*” Without independent verification, those claims are unsupported by the actual condition of the infrastructure.

This issue is made more concerning by prior federal investment. In 2020, Springfield Terminal Railway Company, a Pan Am subsidiary, received approximately \$16.8 million in CRISI funding for the Pine Tree Corridor project. That work included replacing rails, installing tens of thousands of ties, upgrading grade crossings, and strengthening bridges in the same general corridor between Waterville and points north. These were taxpayer-funded improvements meant to improve safety and long-term service. CSX later acquired this system and the benefit of those investments through the Pan Am transaction. Now, only a few years later, CSX is attempting to divest portions of that same system through an exemption, while stating that no specific commitments were made for these lines. That position ignores the fact that federal funding was already used to improve this corridor.

This raises a simple but important concern: infrastructure improved with public funds is now being transferred without clear accountability, without confirmation that those improvements will be maintained, and without assurance that the original purpose of those investments will continue. The record shows a pattern of deferred maintenance, declining conditions, and removal of key components, not continued investment. That does not align with the intent of the CRISI program or the commitments made during the Pan Am acquisition.

Beyond the condition of the infrastructure, this transaction also creates real labor impacts that are not fully addressed. While some employees remain under New York Dock protection, not all affected employees are covered. Signal employees hired after the Pan Am transaction are not protected, and this transaction will reduce active territory and workload. The Bucksport Branch represents about a 33 percent

reduction in assigned assets, and the Augusta Branch results in about a 16 percent reduction. These reductions will lead to reassignment, consolidation, and impacts on employees who do not have protection under New York Dock.

More importantly, CSX has made clear it does not intend to retain signal maintenance work on these lines. Historically, even when operations were transferred, that work remained with BRS-represented employees. This transaction breaks from that practice by transferring control to a third-party with no obligation to the Agreement and no continued role for the existing workforce. This is not just a change in operations; it is a way to remove covered work from the Agreement without bargaining. If allowed, it creates a path for railroads to avoid labor obligations by leasing out infrastructure instead of negotiating changes.

These lines are not being transferred as viable, well-maintained rail assets. They are being divested after years of declining conditions, reduced safety infrastructure, and removal of signal responsibilities despite prior federal investment. This transaction relies on claims that do not match field conditions, involves infrastructure improved with taxpayer funding, and removes protected work through structural means. This is not a routine transaction and should not be treated as one.

At a minimum, the Board should confirm the actual condition of the Augusta and Bucksport Branches, including track and grade crossings, before considering transfer. It should then determine whether this lease structure removes covered work in a way that conflicts with New York Dock protections. Further, the Board should ensure that infrastructure improved with CRISI funding will be maintained and used consistently with its public purpose. Lastly, given the condition of the lines, conflicting claims, prior federal funding, and labor impacts, the Board must determine whether this transaction warrants more than exemption-level review.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Baldwin", with a stylized flourish at the end.

Michael S. Baldwin
President

cc: Parties of Record



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Daniel Jacopino

General Chairman
CSXT Northern General Committee

April 28th, 2026

Chris Hand
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Re: CSX / TransloadX Transaction – STB Docket No. FD 36909

Mr. Hand,

I am providing this statement to support the Brotherhood of Railroad Signalmen's formal comments opposing the proposed lease and operation of the Augusta Branch and Bucksport Branch by TransloadX Railroad Company. The observations below are based on direct, firsthand knowledge of the condition, operation, and labor impacts associated with these lines.

CSX has represented that it has made capital improvements to the Augusta and Bucksport Branches and that the lines are "sufficient to provide safe and efficient service." Based on conditions observed in the field, those representations do not reflect the actual state of these assets.

Augusta Branch:

The primary cited improvement on this branch appears to stem from a derailment that occurred on a bridge. The resulting work was largely restorative in nature—necessary to recover from the derailment—rather than an investment intended to improve or develop the line for sustained operation. This should not be characterized as discretionary capital investment or enhancement of service capability.

Bucksport Branch:

Only the first approximately five miles of the Bucksport Branch can be considered marginally operational, and even that segment is maintained at a barely serviceable condition. Beyond that point:

- There are known washouts,
- Fallen trees and vegetation obstruct the track,
- Rails have been physically turned or disconnected to prevent movement,
- The final two highway-rail grade crossings are paved over.

These conditions are inconsistent with a railroad that is "sufficient to provide safe and efficient service." In practice, large portions of the branch are not movable without substantial remediation. From a signal and crossing perspective, the line has been allowed to deteriorate rather than maintained in a service-ready condition.

In addition to the observed degradation of their track infrastructure, it is important to note that any highway-rail grade crossing proposed to be returned to service would be required to undergo full inspection and operational testing prior to activation, consistent with FRA regulations and industry practice.

Based on firsthand knowledge of the condition of these crossings, a significant number would not pass required operational tests if inspected today. Issues include removed or missing components, long-term out-of-service conditions, paved-over crossings, and the absence of maintained circuitry and warning systems. These are not minor deficiencies; they are fundamental safety failures that would prevent lawful activation.

Accordingly, representations that the Bucksport and Augusta Branches are “sufficient to provide safe and efficient service” do not align with the condition of the highway-rail grade crossings that would be essential to any such service. In practical terms, these crossings are not operationally viable without substantial rehabilitation and regulatory review.

If the parties to this transaction maintain that the crossings are serviceable or readily returnable to service, then the appropriate course is an on-site inspection by the Federal Railroad Administration (FRA). A field review by FRA personnel would allow an independent determination of 1) the operational status of each highway-rail grade crossing, 2) whether required signal systems and warning devices are present and functional, and 3) whether the crossings meet minimum safety standards for activation.

Absent such verification, claims of operational readiness are speculative and unsupported. From a signal safety perspective, transferring responsibility for these crossings without confirming their regulatory viability places both railroad employees and the traveling public at risk.

Employees directly associated with these branches are under New York Dock protections from the prior CSX–Pan Am transaction. However, important impacts of this transaction fall outside what those protections contemplate.

Specifically:

- Signal employees hired after the Pan Am transaction are now working approximately 60–70 miles south of these branches and are not covered by New York Dock protections.
- The removal of the Bucksport Branch will reduce the maintainer’s assigned assets and territory by approximately 33%.
- The maintainer responsible for the Augusta Branch will also lose 16 percent of workload with this transaction.

This reduction in active territory and assets directly affects manpower requirements. While the immediate effect may be workload reduction for protected employees, the secondary effects include reassessment of workloads by CSX, reallocation or consolidation of signal territories, and displacement or adverse impacts on non-protected employees who are filling positions after the Pan Am transaction.

In short, not all employees affected by this transaction are protected, and the transaction indirectly creates workforce consequences that New York Dock was not designed to address through asset divestiture.

This transaction raises a broader and deeply troubling issue beyond the immediate condition of the line. It seems to be creeping erosion and circumvention of negotiated agreement protections through leasing transactions.

CSX maintains a collective bargaining agreement with the Brotherhood of Railroad Signalmen that clearly governs signal maintenance and related work within this territory. Historically, even where CSX has leased or transferred operational control of certain assets, signal maintenance work has remained with BRS-represented employees pursuant to agreement terms. Those arrangements have preserved both safety accountability and contractual integrity.

CSX has confirmed they have no intention of maintaining the rail line or have our workforce perform the signal work on these lines. The proposed lease to a third-party short-line operator departs from that established practice. By transferring temporary control of the line to an outside entity with no obligation to the BRS agreement and with no retained access or maintenance rights for CSX's signal employees this transaction effectively removes covered work from the scope of the agreement through a private lease, rather than through bargaining. This Board-approved modification erodes away bargaining rights to these members.

This is not merely a change in operations. It is a restructuring designed to bypass negotiated protections, replacing them with a commercial arrangement that strips BRS employees of work historically protected by agreement. If permitted, it establishes a precedent whereby carriers may avoid the substance of their labor obligations not by renegotiation, but by outsourcing infrastructure to third parties.

Such an approach undermines collectively bargained agreements, continuity of qualified signal maintenance, and the Board's long-standing recognition that safety-critical railroad functions depend on experienced, agreement-covered employees.

If transactions of this nature are allowed to proceed without scrutiny, they invite a broader disassembly of labor protections across the industry with one leased segment at a time and without transparency, accountability, or meaningful review.

Based on firsthand observations, the Augusta and Bucksport Branches are not being transferred as viable, well-maintained rail lines. They are being divested after years of deferred maintenance, reduction of safety infrastructure, and erosion of signal responsibilities. This transaction reduces protected signal work, transfers safety obligations without demonstrated readiness, and undermines the intent of prior Board-imposed protections.

For these reasons, the concerns raised by the Brotherhood of Railroad Signalmen are accurate, justified, and deserving of the Board's full consideration.

Sincerely,

Daniel Jacopino
General Chairman
CSXT Northern General Committee

Bucksport Branch

