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Office of Chief Counsel
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Public Record

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BY ELECTRONIC FILING

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

Re: FD No. 36873, *Union Pacific Corp., et al. – Control – Norfolk Southern Corp. et al.*

Dear Chief of Case Administration:

I write on behalf of Northern New England Passenger Rail Authority (NNEPRA) regarding the proposed Union Pacific-Norfolk Southern consolidation. NNEPRA is a quasi-governmental authority established in 1995 and is directed to take all actions that are reasonably necessary to initiate, establish or reinstate regularly scheduled passenger rail service between points within this State and points within and outside this State. NNEPRA provides financial support and oversight of the Amtrak Downeaster passenger rail service which provides daily service between Brunswick, Maine and Boston, Massachusetts. The Downeaster operates over approximately 104 miles of track owned by CSX Transportation. NNEPRA depends upon CSX to assure the safe, reliable and efficient operation of Downeaster trains and partners with CSX on projects to maintain and improve the performance of both passenger and freight trains.

The freight rail network is critically important to the U.S. economy. While we are not directly affected by the Union Pacific-Norfolk Southern merger, a transaction of this magnitude has the potential to have far reaching consequences which could impact users of the rail network across the country. For instance, if this merger were to divert traffic off CSX territory it could negatively impact their reinvestment in infrastructure that supports both freight and passenger trains. Further, this merger could prompt additional consolidations, which may not only increase costs for American businesses and consumers but also impact the reliable operation of passenger trains across the country.

NNEPRA urges the STB to conduct a rigorous and comprehensive review of the proposed transaction to not only ensure it delivers substantial public benefits and enhanced competition for rail shippers, but considers unintended consequences which could have negative impacts on passenger service and travel across our nation.

NNEPRA requests that the STB accept these comments as part of the record in this proceeding and is complying with the STB's service requirements for doing so. At this time, NNEPRA wishes to be considered a "non-party." NNEPRA reserves the right to change its status if it elects to do so and complies with the STB's requirements for doing so.

I hereby certify that on this date, I caused a copy of the foregoing letter to be served by email or first-class mail on all Parties of Record in this proceeding.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Patricia Quinn".

Patricia Quinn
Executive Director

cc: All Parties of Record
Administrative Law Judge Jennifer Soulikias