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October 16, 2026

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

Re: The Alabama Great Southern Railroad Company – Abandonment Exemption – In St. Tammany Parish, LA., AB 290 (Sub-No. 423X)

Dear Chief of Case Administration,

The Alabama Great Southern Railroad Company ("AGS") respectfully submits this response to the Surface Transportation Board's October 6, 2026, decision directing AGS to provide additional information in the above captioned proceeding. The Board expressed concern that consummation of the proposed abandonment could sever a connecting railbanked segment from the interstate rail network. The line at issue in this proceeding extends from milepost NN 35.31+/- to milepost NN 36.66+/- and milepost NA 36.00 to milepost NA 38.25+/- in St. Tammany Parish, Louisiana, ("the Line"). At milepost 38.25+/-, the Line connects to the railbanked segment currently used as the Tammany Trace recreational trail ("Railbanked Segment").[1]

AGS does not intend to take any action that would strand the Railbanked Segment or otherwise impair the continued preservation of the Tammany Trace trail. To the contrary, AGS's objective is to preserve the corridor subject to this proceeding by railbanking the Line, connecting it to the existing Tammany Trace trail system. AGS and interested parties have been engaged in preliminary discussions regarding a potential trail use and railbanking for the Line.

[1] The Railbanked Segment was authorized for abandonment in Illinois Central Railroad Company – Abandonment Exemption – In St. Tammany Parish, LA., AB 43 (Sub-No. 154X) (ICC served July 2, 1992).

AGS has been awaiting the filing of a request for a Notice of Interim Trail Use ("NITU") by St. Tammany Parish and/or another qualified trail sponsor. Upon the filing of such a request, AGS intends to consent to the issuance of a NITU and to negotiate in good faith toward a trail use/railbanking.

AGS believes the most likely outcome is that the Line will be preserved through railbanking and connected to the existing Tammany Trace trail corridor, thereby maintaining the continuity of both segments of the corridor while preserving each for potential future rail service needs. However, if AGS and a prospective trail sponsor are ultimately unable to reach a trail use agreement, AGS does not intend to consummate any abandonment authority so as to disconnect the Tammany Trace Trail from the interstate rail network. If no trails use agreement is reached for the Line, AGS would either (1) refrain from consummating the abandonment authority, thereby preserving the Line intact; or (2) more likely, exercise its lesser included discontinuance authority rather than consummate the abandonment authority. Either outcome would avoid severing the Tammany Trace corridor from the remainder of the interstate rail network.[2]

If there are any questions concerning this letter, please contact me, at: William Mullins, Mullins Law Group PLLC, 2001 L Street, N.W., Suite 720, Washington, D.C., 20036; by FAX: (202) 464-9123; by e-mail: wmullins@mullinslawgroup.net; or by telephone: (202) 663-7823. If I am not available, you may also contact my associate, Michaela Bowles, who can be reached at (202) 663-78269 or by e-mail at mbowles@mullinslawgroup.net.

Respectfully submitted,

***/s/ William A. Mullins***
William A. Mullins
Attorney for The Alabama Great Southern Railroad Company

cc: Parties of Record

[2] The Board's "stranded segment" doctrine as articulated in Elk River R.R.—Aban. Exemption—in Kanawha & Clay Cntys., W. Va., AB 1314X, slip op. at 3-4 (STB served Mar. 25, 2022) and other cases prevents AGS from fully exercising its abandonment authority solely because another railroad (Illinois Central) decided years ago, in this case in 1992, to make an independent decision to railbank its line, which decision adversely impacts AGS statutory right to fully abandon its Line. AGS is forced to either discontinue or railbank, neither of which allows AGS to obtain the full constitutional value of its Line. The Board should reconsider its "stranded segment" doctrine as it applies to railbanked lines as it is based upon a fundamental flawed reading of 49 U.S.C. § 10501(a)(2).