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October 26, 2026

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

Re: ***Alameda Belt Line—Operation Exemption—Board of Harbor Commissioners of the Port of Los Angeles, Board of Harbor Commissioners (Long Beach), Alameda Corridor Transportation Authority, and Union Pacific Railroad Company*, FD 36946**

To the Chief of Case Administration:

Alameda Belt Line ("ABL") submits this reply to the unsolicited, unauthorized letter filed by Pacific Harbor Line, Inc. ("PHL") on October 21, 2026.

PHL's latest submission is procedurally improper. Under 49 C.F.R. § 1104.13(c), "[a] reply to a reply is not permitted." The Board's October 15 decision postponed the effective date of the exemption to afford the agency time to consider the pleadings already before it; it neither granted PHL's housekeeping stay nor invited any further briefing. Further submissions into this record are unnecessary, but ABL leaves to the Board whether ABL should file a substantive reply as the agency did shortly after receiving PHL's housekeeping stay request.

PHL's unsolicited filing offers no new legal basis *or practical need* for transforming a class exemption process into a fitness-oriented regulatory bottleneck to adjudicate transition logistics; the Ports already conducted that exact due diligence when they selected ABL after a rigorous 17-month procurement cycle.

PHL repeats a claimed lack of understanding on transition issues, omitting again that *PHL withdrew from the parties' bi-weekly meetings*. ABL and port officials stand ready to resume those discussions—the appropriate mechanism for addressing transitional issues. ABL's door remains open to cooperative, good-faith implementation, but PHL cannot unilaterally boycott transition planning while invoking its own nonparticipation as a basis for requesting STB intervention.

ABL remains firmly committed to a seamless transition and is diligently executing its operational framework with the support of the track owners, Class I carriers, and labor representatives as we quickly approach the required December and January implementation dates. We respectfully urge the Board to disregard PHL's unauthorized filing and permit the class exemption to become effective so the parties can focus on their operational transition.

Respectfully submitted,

/s/*R. A. Wimbish*
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cc: All parties of record