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October 26, 2026

VIA ELECTRONIC FILING

Ms. Cynthia T. Brown
Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

Re: **Docket No. FD 36859**
CSX Transportation, Inc. – Terminal Trackage Rights –
Norfolk Southern Railway Company and
Norfolk and Portsmouth Belt Line Railroad Company

Docket No. NOR 42183
CSX Transportation, Inc. v. Norfolk Southern Corporation
and Norfolk Southern Railway Company

Docket No. AB-290 (Sub-No. 299X)
Norfolk Southern Railway Company – Discontinuance
of Service Exemption – In Chesapeake, VA

Docket No. AB-1024X
Norfolk and Portsmouth Belt Line Railroad Company –
Discontinuance of Trackage Rights Exemption – In Chesapeake, VA

Dear Ms. Brown:

Norfolk and Portsmouth Belt Line Railroad Company ("NPBL") hereby replies to the status report filed by CSX Transportation, Inc. ("CSXT") in the above-captioned proceedings on October 5, 2026. As CSXT indicates, with NPBL's extensive cooperation, CSXT intermodal traffic to Norfolk International Terminals ("NIT") began moving via NPBL service on July 21, 2026. Such service is currently provided five days per week, and significant volumes of CSXT intermodal traffic are being handled by NPBL. NPBL has constructively coordinated with CSXT on these movements, CSXT Status Report at 2, and expects to continue such cooperative engagement with CSXT on NIT intermodal traffic.

In several respects, however, CSXT's status report provides incomplete information regarding what CSXT considers to be "barriers" to expansion of its intermodal service. Most significantly, CSXT complains about a 5,800-foot train length limitation on inbound CSXT trains that must be yarded at NPBL's Berkley Yard, due to restricted headroom at that location.[1] That limitation has only come into play because CSXT has been tendering trains to NPBL that include both intermodal and mixed manifest traffic. Those trains must be yarded at Berkley Yard in order to remove the manifest traffic for subsequent switching by NPBL. If and when CSXT operates and delivers to NPBL a dedicated intermodal train – as would presumably be CSXT's intention in seeking to grow its rail intermodal traffic to NIT – NPBL would operate that train around Berkley Yard and directly to NIT. It is thus CSXT's own operational patterns that create today's train length limitations.

CSXT also complains that intermodal service to NIT is today provided five days rather than seven days per week, due to the availability of NPBL crew resources. But CSXT acknowledges that NPBL is training additional crew members specifically to handle CSXT intermodal traffic and anticipates being able to provide seven-day service for CSXT to NIT by this December. CSXT Status Report at 5. As a result, this issue will be resolved within two months, and the train length issue can be resolved by CSXT operating dedicated intermodal trains to handle the increased traffic that it anticipates.

Finally, NPBL notes CSXT's presumption that NPBL has not been sharing CSXT intermodal traffic volumes with Norfolk Southern Railway Company ("NS"), NPBL's co-owner with CSXT. CSXT Status Report at 3, n.3. As CSXT is aware, NPBL periodically and routinely shares its traffic volumes by commodity types with its board of directors, which is composed of representatives of both CSXT and NS. NPBL does not consider the longstanding sharing of such information with its board of directors to be inconsistent with its status as a neutral switching carrier.

Ultimately, with these clarifications, NPBL agrees with CSXT that "through continued good faith cooperation" between the parties, CSXT intermodal traffic to NIT can be handled efficiently and continue to grow. CSXT Status Report at 9.

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[1] While CSXT indicates that NPBL "imposed" this cap, CSXT acknowledges that this physical limitation on headroom operations at Berkley Yard would exist "[e]ven if NPBL lifted the cap." CSXT Status Report at 4.

I certify that a copy of this letter has been served by electronic mail on counsel of record in these proceedings.

Respectfully submitted,

/s/ *Thomas J. Litwiler*

Thomas J. Litwiler
Attorney for Norfolk and Portsmouth
Belt Line Railroad Company

TJL:tl

cc: Parties of Record