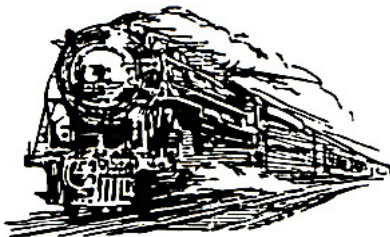


J. M. KARAKIAN
 General Chairman
 43422 West Oaks Drive, PMB 137
 Novi, MI 48377-3300
 BLET Phone: (248) 926-0623
 FAX: (248) 926-0807

General Committee of Adjustment
Brotherhood of Locomotive Engineers & Trainmen
Division of Teamsters
Grand Trunk Western Railroad

ENTERED
 Office of Proceedings
 July 11, 2018
 Part of
 Public Record



July 11, 2018

Ms. Cynthia Brown
 Chief, Section of Administration
 Office of Proceedings
 Surface Transportation Board
 395 E. Street, S.W.
 Washington, D.C. 20423-0001

ELECTRONICALLY FILED

BEFORE THE SURFACE TRANSPORTATION BOARD

In the Matter of:

STB Finance Docket No. 36179

PROTEST, OF THE BROTHERHOOD OF LOCOMOTIVE ENGINEERS AND
 TRAINMEN, IN OPPOSITION TO LEASE EXEMPTION, LINE OF GRAND TRUNK
 WESTERN RAILROAD COMPANY

PETITION TO REVOKE

FEE RECEIVED
 July 11, 2018
 SURFACE
 TRANSPORTATION BOARD

FILED
 July 11, 2018
 SURFACE
 TRANSPORTATION BOARD

The Brotherhood of Locomotive Engineers and Trainmen, a Division of the Rail Conference of the International, Brotherhood of Teamsters ("BLET"), specifically, this Grand Trunk Western General Committee of Adjustment ("GTW / GCA"), submits, for reasons as set forth below, the following **Petition To Revoke**, in regard to the above stated transaction, between Lake State Railway Company ("LSRC"), and Grand Trunk Western Railroad Company, involving approximately 3.9 miles of track in Port Huron, Michigan.

On April 12, 2018, LSRC posted a Notice pursuant to 49 CFR S 1150.42 (e) that it intended to enter into a lease with GTW for operation of the above described trackage area. In said Notice, LSRC clearly states GTW will retain responsibility for the Black River Drawbridge at milepost 58.2. And once again, in its May 10, 2018, Notice of Exemption filing, LSRC states GTW will retain responsibility for the Black River Drawbridge located at milepost 58.2 on the Port Huron track area.

Subsequently, after the Notice of Exemption was granted, I, John Karakian, personally sent the following email to Mr. Phillip Tassin, GTW General Manager of the territory in question, asking if LSRC is maintaining operation of the Black Water Drawbridge at MP 58.2:

From: John M. Karakian <karakian@ameritech.net>
Sent: Tuesday, July 10, 2018 11:24 AM
To: 'Phillip TassinJr' <Phillip.TassinJr@cn.ca>; 'Phillip' <Tassin@cn.ca>
Subject: RE: LSRC Employees operating Black River Drawbridge...

Good Morning, Phillip----

It has come to my attention, that LSRC Employees are operating the Black River Drawbridge at MP 58.2, even though the lease states it will stay under the jurisdiction of GTW.

In this regard, I hear you transmitted an email, on June 15, 2018, stating the drawbridge will be operated by LSRC Employees. Is that correct?

Please get back.

**Thank you,
John**

Approximately three (3) hours later, Mr. Tassin contacted me, via telephone, and through said telephone conversation, **he stated/confirmed, reiterating, making it unequivocally**

clear, that LSRC will operate the Drawbridge at Milepost 58.2 and that he was not going to send-out a [GTW] Conductor to operate the Drawbridge.

When I asked Mr. Tassin, to send me this in writing, he went on to state, that he would not bother to respond to my email, until a week from now or later.

Therefore, due to the time urgency of this issue, I would ask, that the Board take action to Revoke the above referenced Lease Exemption, due to our belief, the above is contrary to the filing, a misrepresentation made in the Notice of Exemption by LSRC, and thus, in violation of the STB Order, due to LSRC stating in its Notice **that GTW will retain responsibility for the Black River Drawbridge** at mileage 58.2, and thus, it was falsely represented.

Please take the above into consideration, in regarding to our respectful, formal Protest, to Revoke the LSRC Lease Exemption, declaring it null & void, in connection with 49 CFR S 1152.50(d)(3), due to Carrier not operating the Black Water Drawbridge in conjunction with its Notice to the Surface Transportation Board, **and award this work back to the Port Huron Locomotive Engineers and Trainmen**, due to LSRC's misrepresentation in its filing.

Thanking you for your consideration and a quick response is greatly appreciated.

Respectfully submitted,

Sincerely,

J. M. Karakian



General Chairman, BLET / GTW / GCA

C. c: "All Parties of Record" via UPS Delivery

Also, C. c. via email: Mr. Steve Napierkowski / Manager, Labor Relations, GTW
Mr. Dennis Pierce / National President, BLET
Mr. Gil Gore / Assigned Vice President, BLET

Mr. John Tolman / Vice President & National Legislative Representative, BLET
Mr. Brant Trumble / Legislative Director, State of Michigan, BLET
All BLET/GTW Local Chairmen