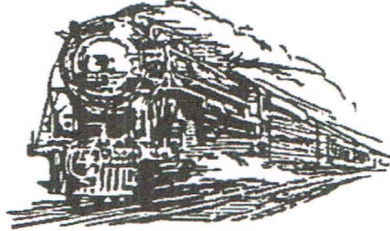


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General Committee of Adjustment
Brotherhood of Locomotive Engineers & Trainmen
Division of Teamsters
Grand Trunk Western Railroad



245865

June 03, 2018

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

ENTERED
Office of Proceedings
June 4, 2018
Part of
Public Record

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 APPLICATION

ADDENDUM TO PETITION TO STAY

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”), further opposes, for reason as set forth below, the proposed lease to, and the proposed operation of, by Lake State Railway Company (“LSRC”), that part of the trackage, as specifically identified in the above referenced Finance Docket, currently owned and operated by Grand Trunk Western Railroad Company.

In this regard, at the time of the above referenced application, LSRC filed for lease, of the “PH Track,” and based projected revenues upon such consummation.

However, duplicated below, from page 15, of the current timetable instructions, issued to current CN (GTW) employees, wherein it specifically describes and states, as follows:

“Port Huron Terminal – (HR Track) – Black River Drawbridge – Do not exceed 5 MPH crossing Black River Drawbridge on HR Track. Drawbridge must be operated by crew member when the river is open to navigation.”

As you can see, “The HR Track,” is listed in the Port Huron Terminal, and with specific instructions as detailed, i.e. **“Do not exceed 5 MPH crossing Black River Drawbridge on HR Track.”**

Port Huron is a large terminal, with many tracks, thus, precise identification is not only necessary and required, it’s extremely crucial. As shown above, there is a track, identified as the “HR Track,” which “we think,” may be the track in question, however, we do not know for sure. However, we know of no such track at Port Huron, known as the “PH Track.”

In this regard, we (this BLET/GCA), are unsure, of where, or what, LSRC’s legal team is referring to, when it continues to state the subject of lease, is the “PH Track.” In our many years of service on this property, we have no information of Port Huron Terminal having such a track, known as the “PH Track.” Furthermore, we see no such listing, mention, identification, acknowledgement and/or location, in the current timetable instructions, as to the existence and/or location of, the “PH Track”

Also, on bottom of page 3, of its recent May 31st reply, to our Petition of May 11th, LSRC continues to refer to the trackage in question as the "PH Track."

If LSRC continues to stick to its position, of being involved with GTW and STB, in the intended consummation of lease of track, known as the "PH Track," then we have no idea of where such track is or of its actual existence. For all we know, LSRC could also have the mileposts stated incorrectly, of whatever trackage they are supposedly interested in, and who knows what else may be incorrectly identified, in their filing, especially after we've already brought this precise issue to their immediate attention, for their correction, through our Petition of May 11.

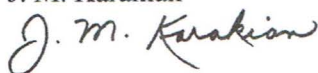
In this regard, this is a very important issue, there are jobs and careers at stake, and we are entitled to precise specifics, not guessing games. We hope you can understand where we are coming from, and our concern, and among other things, at the very least, it's called Respect.

Bottom Line: we will leave it to the decision of STB, as to whether or not it considers such continued inaccuracy by LSRC, of such an important issue, as to the necessity for the precise identification of the trackage in question for consummation/lease, as being: (a) false and misleading information contained in the filing, or (b) typographical. But no matter what, in our estimated opinion, we believe it is bad information, which LSRC lawyers have detailed and listed, and continue to list, in their intended lease filings, and we believe STB should know about this issue.

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