

#E1-18717
RD 35522
DAW



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July 15, 2011

Mr. Kevin Keller
HDR Engineering, Inc.
4435 Main Street, Suite 1000
Kansas City, Missouri 64111
csxtgrandtrunk@hdrinc.com

Dear Mr. Keller:

Thank you for the opportunity to review and provide comment on the proposed CSX Transportation Acquisition of the "Elsdon Sub" of the Grant Trunk Western Railroad Company (STB Finance Docket No. 35522). We have several questions and concerns related to this acquisition:

Questions:

1. Does this transaction constitute a transfer of ownership rights or only rights to operate service over the line (i.e. trackage rights)?
2. Does this transaction transfer operational control of the entire Elsdon Subdivision to CSX or simply the line from Munster to Elsdon?
3. What is the overall impact of traffic routing in the region?
4. Will additional traffic need to operate on or cross Metra's Milwaukee West Line or other Metra lines as a result of this transaction?
5. Will interchange with the BNSF at Corwith be increased as a result of this transaction?
6. Will additional traffic on or crossing the BNSF result from this transaction?

Concerns:

The Chicago Terminal is the most congested in the country, and small changes can have large impacts to operations. Close day-to-day coordination is needed between all railroads to continue a smooth traffic flow. Metra has concerns regarding the impacts of the proposed acquisition on Metra existing and proposed future commuter rail service. As the accompanying documentation accurately states, Metra currently operates 30 trains per weekday over the SouthWest Service (SWS) Line. The proposed acquisition would increase the number of trains crossing this line by 37% going from a total of 25.5 crossing trains to 36.0 crossing trains between the Ridge and Ashburn Interlockings. This may have a negative impact on Metra's ability to operate on-time service. In addition, the queuing of freight traffic north of the Ashburn Interlocking may be a concern. It is not clear whether sufficient track length exists to queue a freight train north of the crossing, which may result in challenges coordinating movements through Ashburn Crossing.

As a condition of the approval of this transaction, Metra requests that CSXT negotiate in good faith with NS to transfer operational control of the Ashburn Interlocking to Metra in order to ensure that passenger operations are given priority over freight operations through the crossing. In the absence of this result, control of the Ashburn Interlocking should remain with NS. We do not believe that commuter rail traffic in this area is best served with the Ashburn Interlocking controlled by CSXT.

In addition to the Impacts on the SWS, Metra has proposed initiating commuter operations on the UP/CSX Villa Grove Sub as part of its SouthEast Service (SES) project. The proposed SES Line has completed Alternatives Analysis and is awaiting a request to begin Preliminary Engineering. If trains that previously operated straight through the Thornton Junction will now be switching from the Villa Grove Sub to the Eldson Sub, this will slow operations, making it more difficult to operate passenger service on this segment. Metra requests that as a condition of the approval of this transaction a commitment be made to evaluate and mitigate any reduced capacity to operate commuter service on the Villa Grove Sub that results from this transaction.

We appreciate the opportunity to provide feedback on this proposed transaction, and we look forward to working with the CSX and the Grand Trunk as the evaluation of this transaction proceeds.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alex Clifford', with a long horizontal flourish extending to the right.

Alexander D. Clifford
Executive Director/CEO

cc: Lynnette Ciavarella
George Hardwidge