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August 17, 2005

BY HAND DELIVERY

The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, DC 20423-0001

214549

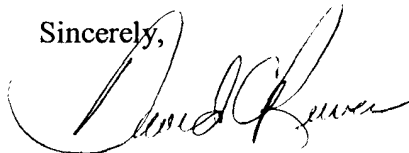
Re: STB Docket No. AB-490 (Sub-No. 1X)
Greenville County Economic Development Corporation - Petition For
Exemption For Partial Discontinuance And Partial Abandonment - In
Greenville County, SC

Dear Secretary Williams:

Enclosed are an original and 11 copies of the Reply of the Greenville County Economic Development Corporation to Comments Partially Opposing Petition. As can be seen from the certificate of service attached, copies of this reply are being mailed today to all parties of record.

Please file stamp the 11th copy of this reply and return it to the person making this filing for return to me. If there are any questions concerning this proposal, please contact me by telephone at (202) 663-7824 or by e-mail at dreeves@bakerandmiller.com.

Sincerely,



David C. Reeves

Enclosures

cc: Chairman, GCEDC
Andrew J. White, Jr., Esq.
Peter M. Strub

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Part of
Public Record

214549

**BEFORE THE
SURFACE TRANSPORTATION BOARD
WASHINGTON, DC**

**STB DOCKET NO. AB-490
(SUB-NO. 1X)**

**GREENVILLE COUNTY ECONOMIC DEVELOPMENT CORPORATION
- PETITION FOR EXEMPTION FOR PARTIAL DISCONTINUANCE
AND PARTIAL ABANDONMENT - IN GREENVILLE COUNTY, SC**

**REPLY OF THE GREENVILLE COUNTY ECONOMIC DEVELOPMENT
CORPORATION TO COMMENTS PARTIALLY OPPOSING PETITION**

ENTERED
Office of Proceedings

AUG 18 2005

Part of
Public Record

**William A. Mullins
David C. Reeves
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**Attorneys for Greenville County
Economic Development Corporation**

August 17, 2005

**BEFORE THE
SURFACE TRANSPORTATION BOARD
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**STB DOCKET NO. AB-490
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**REPLY OF THE GREENVILLE COUNTY ECONOMIC DEVELOPMENT
CORPORATION TO COMMENTS PARTIALLY OPPOSING PETITION**

Greenville County Economic Development Corporation ("GCEDC") hereby replies to the comments partially opposing¹ GCEDC's June 24, 2005 petition to the Surface Transportation Board ("STB" or "Board") in this proceeding ("GCEDC's Petition").²

SUMMARY

In ruling on an abandonment exemption petition, the Board must decide if the extensive application procedures of 49 U.S.C. §10903 are necessary to determine whether the burden on the railroad of continued operation is outweighed by public need for service on the line.

¹ GCEDC's Petition seeks an exemption for GCEDC to abandon approximately 11.8 miles of rail line between milepost 0.0 in Greenville, SC, and milepost 11.8 in Travelers Rest, SC ("the Northern Segment"), and to discontinue service over 3.29 miles of line, between milepost AJK 585.34 in East Greenville, SC, and milepost AJK 588.63 in Greenville, SC (the "Southern Segment"). None of the comments contest GCEDC's proposal to discontinue service over the Southern Segment. Accordingly, the Board should consider that portion of GCEDC's Petition to be unopposed.

² Although replies to comments in an exemption proceeding are somewhat uncommon, GCEDC requests that the Board consider this reply to take into account information it contains about the commenting parties and in light of the Board's recent resolution of the complaint case filed against GCEDC concerning the involved line. *See generally San Diego & Imperial Valley Railroad Company, Inc.—Exemption from 49 U.S.C. 10901 and 11301*, 1985 ICC LEXIS 181 (Sept. 20, 1985) at *3 (the Board's procedural rules are to be liberally construed, and replies to comments in an exemption proceeding are appropriate where unusual issues are raised).

GCEDC's Petition provided substantial evidence of the tremendous cost of restoring the Northern Segment to service, the extremely high rates that would be necessary to recoup those costs, and the lack of prospective traffic on the Northern Segment even if service was available. Moreover, GCEDC's Petition showed that GCEDC has been unable, despite years of trying, to acquire the funds necessary to restore the Northern Segment to operation.

The opposing comments confirm that failing to relieve GCEDC of the continued responsibility for operation of the Northern Segment would create an unreasonable and unnecessary burden on GCEDC. None of the commenters state that they would ship any traffic by rail if rail service was available at the prices projected in GCEDC's petition. Indeed, the comments indicate that prices for available direct truck or rail-truck transload service are below the rates GCEDC would need to charge in order to recoup the costs of restoring the line to service. In addition, all of the commenters demonstrate that they are currently able to operate their businesses without rail service. In short, none of the comments opposing GCEDC's Petition show that expending the millions of dollars required to restore the Northern Segment to service, even if funding were available, would be anything other than a complete waste of money. Accordingly, the Board should grant GCEDC's Petition.

DISCUSSION

The exemption process is designed to minimize regulatory burdens. Under 49 U.S.C. §10502(a), the Board must exempt a transaction from regulation when it finds that: (1) continued regulation is not necessary to carry out the rail transportation policy of 49 U.S.C. §10101; and (2) either (a) the transaction or service is of limited scope, or (b) regulation is not necessary to protect shippers from the abuse of market power. Utilizing the exemption procedure is appropriate when the information available is sufficient for the Board to reach an informed

decision. *See Soo Line Railroad Company--Abandonment Exemption--In Marshall and Roberts Counties, SD*, STB Docket No. AB-57 (Sub-No. 48X) (served Nov. 17, 1999).

The information presented in this proceeding is ample for the Board to conclude that, despite the commenters' opposition, the burden of continued operation of the Northern Segment far outweighs any potential public benefit from continued operation of that line. Accordingly, further regulation of this abandonment through full Section 10903 procedures is not necessary to carry out the National Rail Transportation Policy or to protect shippers from an abuse of market power. Because the line is less than 12 miles long, lies in a single county, and has been out of service for a number of years, the exemption of this abandonment is clearly of limited scope.

Four commenters filed letters opposing GCEDC's Petition. None of the letters, however, establishes that, even if GCEDC expended the millions of dollars required to restore the Northern Segment to operational condition, even one carload of freight would move. Thus, the record in this proceeding overwhelmingly establishes that continued operation of the Northern Segment would be an unreasonable burden on GCEDC, and that the Board should grant GCEDC's Petition. GCEDC hereafter briefly addresses each commenter's submission.

Cross Road Sales Incorporated. Cross Road Sales Incorporated ("CRSI") is a new company that has never used rail service at this location. Accordingly, its testimony as to the cost and benefits of rail shipping at this location is speculative.

The business location given by CRSI – 131 Pinsley Circle, Greenville, SC – is the same as the location given for Groome & Associates in the complaint case recently resolved by the Board.³ CRSI is a South Carolina corporation, shown by records of the South Carolina Secretary

³ *See generally Groome & Associates, Inc. and Lee K. Groome v. Greenville County Economic Development Corporation*, STB Docket No. 42087 (served July 27, 2005) ("Complaint Case").

of State's office (*see* Exhibit 1 hereto) to have begun business in January 2004.⁴ Inasmuch as the Northern Segment has been out of service during the entire time since CRSI was formed, CRSI clearly is able to operate its business at the Pinsley Circle location without direct rail service. Indeed, CRSI discloses that even without direct rail service, it generates profits of \$20,000 every 4 to 6 weeks.

CRSI's claim that abandonment of the Northern Segment would damage CRSI by forcing it to relocate machinery is entitled to no weight.⁵ Groome & Associates operated at the Pinsley Circle facility until June 2003, according to Lee Groome's February 2005 rebuttal statement in the Complaint Case (*see* Exhibit 8 to GCEDC's Petition), and CRSI was not formed until January 2004. In June 2003, GCEDC filed a notice of exemption to abandon the Northern Segment (STB Docket No. AB-490X), and Lee Groome's state court lawsuit against GCEDC had been ongoing for about two years. Thus, it was well known to CRSI (particularly because of its connection to the Groome family) when CRSI occupied the Pinsley Circle facility that railroad service was not available. In addition, CRSI's website⁶ shows that it sells used paper-cutting machinery like that located at the Pinsley Circle facility. *See* Exhibit 3. Thus, CRSI could sell the equipment rather than relocating it. The alleged relocation costs for CRSI's machinery are thus speculative and, in any event, are a potential cost that CRSI took on by occupying the former Groome & Associates facility knowing that the facility lacked rail service.

⁴ CRSI's registered agent is James A. Groome, who GCEDC believes to be the brother of Lee K. Groome, the complainant in the Complaint Case.

⁵ It is not clear whether the machinery that CRSI says it would need to relocate is owned by CRSI or actually belongs to Groome & Associates which, though it ceased operations, apparently remains a corporation in good standing in South Carolina. *See* Exhibit 2.

⁶ <http://www.crossroadspaper.com/SurplusMachineryForSale.htm>.

Such speculative costs should not be weighed against the immense financial burden on GCEDC of restoring rail service on the Northern Segment.⁷

CRSI posits that it would save money if it had direct rail service, estimating that it could save approximately \$757 per carload of transloading costs. Even if CRSI could eliminate \$757 per carload of transload costs by having direct rail service, however, it would have to spend even more than that for direct rail service were GCEDC able to return the Northern Segment to operational condition. As shown by Exhibit 10 to GCEDC's Petition, Joesph J. Plaistow, an experienced rail economist, estimates that GCEDC would have to charge more than \$1,430.00 per carload to serve the site that CRSI currently occupies. Because CRSI's transloading operation would be more economical for CRSI than paying GCEDC's direct rail service charges, CRSI would be extremely unlikely to tender traffic to GCEDC even if GCEDC was able to restore the Northern Segment to operational condition.

CRSI is a relatively new business which knowingly chose to locate on a line that was out of service. CRSI has not established, except by speculation, that having direct rail service available would save it money or that its alleged costs of relocation would actually materialize. Accordingly, the alleged harms to CRSI from GCEDC's proposed abandonment are entitled to no weight as contrasted to the enormous financial burdens that restoring rail service would place on GCEDC.

Paper Cutters, Inc. Paper Cutters, Inc. ("Cutters") objects to abandonment of the Northern Segment on grounds that "It cost[s] anywhere from 4 to 9 times more to ship by trucks rather than rail. Lower shipping costs would allow for more market growth and put more people to work in our area." Such comments are so general that they cannot serve as a basis to deny

⁷ CRSI's alleged losses from lost production time and lost profits appear speculative as well, as no explanation is offered of how "lost production time" is a separate cost to CRSI from alleged lost profits.

GCEDC's proposed abandonment. "4 to 9 times" is an extremely broad range, and what is meant by "ship by truck" is completely unclear; *i.e.*, whether it means shipping by truck from mill to Cutters' facility or utilizing rail-truck transload as Cutters has for nearly 8 years.

Cutters also offers no point of reference for its comparison; that is, "4 to 9 times" what? The rail rates that Cutters paid Pinsky when the line was last operated regularly were between \$200 and \$220 per car for the 32 to 41 carloads Cutters moved annually between 1994 and 1996. *See* Exhibit 6 to GCEDC's Petition. By contrast, GCEDC's Petition shows that GCEDC would have to charge approximately seven times those rates in light of the costs of restoring the line. Cutters' letter, of course, makes no commitment to use GCEDC service for even one carload at that rate. Even if it did tender such traffic, its traffic volume would be far too small to support the cost of restoring service.

Cutters' evidence shows that it is a solid small business which has operated for nearly 8 years by using rail-truck transload. Cutters' vague speculation about supposed cost savings if rail service were restored is too insubstantial to offset GCEDC's solid evidence of multi-million dollar costs to restore the line. Likewise, even if Cutters were to tender traffic at GCEDC's prospective rates, its shipping volume is too small to support restoring the line to service.

Industrial Metal Processors, Incorporated. Like Cutters, Industrial Metal Processors, Inc. ("IMP") objects that abandonment of rail service by GCEDC would force it to use more costly truck service. "[T]he current lack of service by GCEDC . . . raises shipping costs in excess of 200% (truck vs. rail)," IMP writes.

IMP's 200% figure is meaninglessly vague. IMP does not state the rates it is currently paying nor does it show that the "200%" figure relates to GCEDC's prospective rates calculated by Mr. Plaistow. The rates IMP previously paid Pinsky ranged from approximately \$340 to \$361 per carload. *See* Exhibit 6 to GCEDC's Petition. As GCEDC's projected rates would be almost

400% of the rail rates IMP previously paid, it appears that for IMP, as for CRSI, existing truck service is more economical than any rail service GCEDC could afford to provide.

Like other opposing commenters, IMP makes no promise to tender any traffic to GCEDC if service were made available. Indeed, it was IMP's decision to shift traffic away from the line in 1996 that precipitated Pinsly's decision to sell the line due to poor financial prospects for continued operation. See Exhibit 8 to GCEDC's Petition. Although it alleges that "many on-line shippers [] can benefit from reinstituted rail service," IMP fails to identify any such shipper. Accordingly, IMP's comments fail to carry probative weight.

Bleachery Road Warehouse, Inc. Bleachery Road Warehouse, Inc. ("BRW") asserts that while it would like rail service to be available at its site,⁸ it at least does not want the line to be converted to trail use. BRW apparently misconceives the Board's role with respect to trail use.

The Board's role under the National Trails System Act is ministerial in nature. As the Board recently said,

The Board's role under the Trails Act is limited and ministerial. . . . We do not decide whether interim trail use is desirable for a particular line and do not analyze, approve, set the terms of—or even require that parties submit to the Board—their trail use agreements. . . . Moreover, we play no part in the parties' negotiations. We are not involved in the type, level, or condition of the trail. Nor are we authorized to regulate activities over the actual trail, and there is no time limit governing when a trail must be developed.

Chelsea Property Owners—Abandonment—Portion Of The Consolidated Rail Corporation's

West 30th Street Secondary Track In New York, NY, Docket No. AB-167 (Sub-No. 1094)A

(served June 13, 2005). Neither is opposition to trail use a ground for denying abandonment, as trail use is only an issue after abandonment has been authorized and no offer of financial

⁸ BRW does not contend that it or its tenants have ever used rail service. Neither does it promise significant use of rail service if it were available.

assistance has materialized.⁹ Even assuming that BRW's assertions of "national security risk" from allowing a trail adjacent to a site for food and lumber warehouses were supportable, the Board's authority under the National Trails System Act does not extend to regulation of a trail.

CONCLUSION

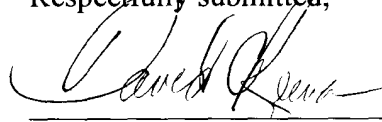
The parties that partially oppose GCEDC's Petition have not even hinted that they would make sufficient rail traffic available to GCEDC at the rates that GCEDC would need to charge to support a sustainable rail operation. Opposing commenters' speculation about cost savings fail to take account of GCEDC's unrefuted evidence of the tremendous cost of restoring the Northern Segment for operation. Accordingly, the opposing commenters' evidence wholly fails to establish any burden on them from abandonment which is even remotely comparable to the burden on GCEDC of somehow obtaining and expending the millions of dollars necessary to restore the Northern Segment to service.

In the Complaint Case, the Board held GCEDC liable for damages that Groome & Associates alleged had resulted from GCEDC's failure to serve or abandon the Northern Segment. GCEDC's 2003 notice of exemption to abandon the Northern Segment was denied by the Board as an inappropriate use of the Board's exemption notice procedures. GCEDC respectfully submits that, particularly in light of the Board's holding in the Complaint Case, GCEDC should not be trapped in the Catch 22 situation of continuing to face the potential of such claims unless it can magically raise millions dollars to restore the Northern Segment to service, especially when this record shows no substantial prospect of recouping the restoration cost.

⁹ See *Wisconsin Central Ltd.-Abandonment Exemption-In Brown County, WI*, Docket No. AB-303 (Sub-No. 13X), 2000 STB LEXIS 96 (served Feb. 17, 2000) at n.6 (trail use requests are commonly held in abeyance pending a decision on the abandonment exemption and resolution of any offer of financial assistance).

GCEDC respectfully requests that the Board grant GCEDC's Petition.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "William A. Mullins", is written over a horizontal line.

William A. Mullins

David C. Reeves

Baker & Miller PLLC

2401 Pennsylvania Ave., N.W.

Suite 300

Washington, DC 20037

Phone: (202) 663-7820

Fax: (202) 663-7849

Attorneys for Greenville County
Economic Development Corporation

**BEFORE THE
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EXHIBIT 1



Secretary of State Search

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Information for: **CROSS ROAD SALES, INC.**

[Check Ch...](#)

Note*** This online database was last updated on 08/16/2005 see our Disclaimer

DOMESTIC / FOREIGN:

Domestic

STATUS:

Good Standing

STATE OF INCORPORATION /

SOUTH CAROLINA

ORGANIZATION:

For Profit

REGISTERED AGENT INFORMATION

REGISTERED AGENT NAME: JAMES A GROOME SR
ADDRESS: 239 BREEZEEDALE RD
CITY: EASLEY
STATE: SC
ZIP: 29640 7967
SECOND ADDRESS:

FILE DATE: 01/23/2004
EFFECTIVE DATE: 01/23/2004
DISSOLVED DATE:

CORPORATION HISTORY RECORDS

Code	File Date	Comment
INCORPORATION (DOMESTIC)	01/23/2004	INCORPORATION

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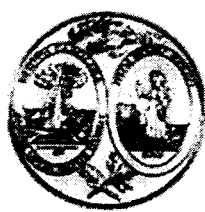
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EXHIBIT 2



Secretary of State

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Office of the South Carolina Secretary of State
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Note*** This online database was last updated on 08/16/2005 see our Disclaimer

DOMESTIC / FOREIGN:	Foreign
STATUS:	Good Standing
STATE OF INCORPORATION /	GEORGIA
ORGANIZATION:	For Profit

REGISTERED AGENT INFORMATION

REGISTERED AGENT NAME:	LEE K GROOME
ADDRESS:	841 TUBBS MTN RD TRAVELERS REST SC
CITY:	
STATE:	
ZIP:	
SECOND ADDRESS:	
FILE DATE:	02/06/1991
EFFECTIVE DATE:	02/07/1991
DISSOLVED DATE:	

CORPORATION HISTORY RECORDS			
Code	File Date	Comment	Document
AUTHORITY(FOREIGN))	02/07/1991	AUTHORITY	FILM

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EXHIBIT 3

Cross Road Sales

Home
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Surplus Machinery For Sale

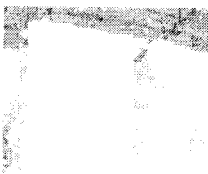
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- >44" Bobst Diecutter SP1120ER (1980)
- >25-1/4" x 35-3/8" Heidelberg Die cutter (1971)
- >25-1/4" x 35" Heidelberg Die cutter (1969)
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- >Staude Master MCR Gluer (2) 1971 & 1968
- >International Folder Gluer Model 6F (1964)
- >International Right Angle Folder Gluer FPO 806 (1950)
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Call Alan with any inquiries or Questions

Toll Free 1-888-899-0090

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001612

CERTIFICATE OF SERVICE

I, David C. Reeves, hereby certify that on this 17th day of August, 2005, copies of the foregoing Reply of the Greenville County Economic Development Corporation to Comments Partially Opposing Petition have been served by first class mail, postage prepaid, upon all parties of record to this proceeding identified on the Surface Transportation Board's website.

A handwritten signature in black ink, appearing to read "David C. Reeves", is written over a horizontal line.

David C. Reeves
Attorney for Greenville County Economic
Development Corporation