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August 3, 2007

Vernon Williams
Secretary
Surface Transportation Board
Washington, D.C.

Via electronic transmission

RE: Comments on STB Dockets FD-35063, FD-35064, and FD-35065

The National Association of Railroad Passengers has serious concerns about the proposed sale of a Norfolk Southern (NS) line in Michigan to a Class Three railroad, WATCO Industries.

The proposed sale includes several NS lines, many of which are light-density branch lines ideally suited for operation by a short line railroad. However, NS's route between Ypsilanti and Kalamazoo is used by 8 Amtrak passenger trains a day and is part of a Department of Transportation-designated High Speed Rail Corridor. In addition, active studies are underway for commuter rail service between Ann Arbor and Detroit, which would use the line from Ann Arbor to Ypsilanti.

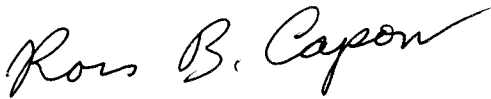
State of Michigan and federal DOT-funded improvements on the Amtrak-owned right-of-way west of Kalamazoo have increased passenger train speeds to 90 mph with a further increase to 110 mph projected by the end of the year. Similar speed improvements east of Kalamazoo have been long-planned. Reflecting the increased attraction of passenger rail, the Amtrak Wolverine service (the brand name for all Chicago-Detroit trains) carried over 324,000 passengers for the period ending June 30, 2007--four percent more than last year. Ridership is also up 4.7% on the Chicago-Port Huron Blue Water, which uses the NS line between Kalamazoo and Battle Creek.

NARP is concerned that a short line operator could let the top speed for passenger trains fall below its current 79 mph (FRA Class IV track standards) on a segment of this growing corridor. Such a decrease in speed would make the service less attractive and result in reduced ridership as travelers switched to other modes of travel. While we are encouraged that WATCO Industries has stated its intention to work with Amtrak to maintain the condition of the railroad, we remain concerned that, despite WATCO's best

intentions, they may not have the technical expertise or the equipment to maintain track to FRA Class IV standards.

With public use of Amtrak services in the state of Michigan growing, now is not the time to place fast passenger train service in jeopardy. With Americans facing record gas prices and our population growing older, it is more important than ever to for the Surface Transportation Board to protect time-competitive and safe passenger rail service.

NARP requests that the STB study this proposed acquisition carefully and if it does approve this transaction, condition its approval on the inclusion of adequate safeguards to maintain passenger rail service at no less than its current level of quality.

A handwritten signature in black ink that reads "Ross B. Capon". The signature is fluid and cursive, with the first name "Ross" and last name "Capon" clearly legible.

Ross B. Capon
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About NARP

NARP is the largest national membership advocacy organization for train and rail transit passengers. We have worked since 1967 to expand the quality and quantity of passenger rail in the U.S. Our mission is to work towards a modern, customer-focused national passenger train network that provides a travel choice Americans want. Our work is supported by over 23,000 individual members.