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VIA ELECTRONIC FILING

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

Re: STB Finance Docket No. 35410 228778
Adrian & Blissfield Rail Road Company – Continuance in
Control Exemption – Jackson & Lansing Railroad Company

STB Finance Docket No. 35411 228779
Jackson & Lansing Railroad Company – Lease and Operation
Exemption – Norfolk Southern Railway Company

STB Finance Docket No. 35418 228800
Jackson & Lansing Railroad Company – Trackage Rights
Exemption – Norfolk Southern Railway Company

Dear Ms. Brown:

In response to the Board's December 28, 2010 decision providing that any interested party may submit comments and evidence by February 10, 2011 with respect to, *inter alia*, safety issues, regarding the consideration of the petition to revoke the notices of exemption in these related proceedings, petitioners Brotherhood of Locomotive Engineers and Trainmen ("BLET") and United Transportation Union ("UTU") submit the following.

On the basis of reports received by BLET and UTU, it is alleged that on December 27, 2010, at approximately 18:15, Eastern Standard Time, a crew of the Jackson and Lansing Railroad Company (JAIL), a subsidiary of the Adrian and Blissfield

Rail Road Company, passed the North Lansing absolute signal that was red (indicating stop) on the CSX Plymouth (Michigan) Subdivision in front of the westbound CSX

Q195-27. The JAIL crew was operating eastbound on track 2 when they traveled approximately 20 car lengths beyond the signal, stopping only to observe the power switch was lined against them. The crew, recognizing that an error had taken place, proceeded to shove or back their train (without rear end protection) west behind the signal without first announcing they had created an emergency situation on the radio to warn oncoming trains or receiving permission from the CSX RN dispatcher.

The CSX Q195-27 traveling westbound at the same time had a favorable signal at Trowbridge, but shortly thereafter were contacted by the CSX RN Train dispatcher, who informed the crew that the signal at MA (Michigan Avenue) may be red. The dispatcher also stated that if the MA signal turned into a favorable signal NOT to take it. When the Q195 crew arrived at the MA signal it was indeed a stop signal, and they complied with the dispatcher's instructions. After some time, the CSX RN dispatcher instructed the conductor of CSX Q195 to walk to the rear of the train in order to protect a reverse move to clear crossings. The crew of CSX Q195 waited one and one-half to two hours at this location before permission to proceed was given by the RN dispatcher.

The JAIL crew stated that this was their first trip on the territory, and they did not feel qualified and were not sure where they were. The JAIL crew also told the CSX officers on the scene that the only qualifying or training they received was via a high-rail truck with another JAIL employee who was new to the area as well. When a JAIL officer arrived on scene, the engineer simply stated that he could not see the signal, with the conductor stating that he was not paying attention. They further stated that they did not realize there was an issue until they came to the power switch and it was not lined for their movement. They did not know that they should have stated "emergency" three times on the radio, provided flagging protection or contact the dispatcher immediately to protect themselves and other trains from a very serious collision.

CSX informed JAIL that the engineer was banned from operating over CSX territory for the next six months, that this incident was a de-certifiable offense and that the FRA should be properly notified. The JAIL officer was then contacted by the CSX RN dispatcher who asked for the CSX operating bulletin number on the documents they had on board so that CSX could be sure they had the proper information to proceed. The dispatcher could not find where the bulletins had been issued for this train. The information (operating bulletin number) provided by the JAIL officer to the CSX dispatcher was not correct, and was over three weeks old. A correct number was provided after several phone calls were made (orders were not physically seen, however) and the train was allowed to travel back onto JAIL property.

While BLET and UTU presently have no direct evidence in support of the reports described above, the events are of such a character that it is respectfully requested that the Board contact the Federal Railroad Administration to determine if that agency has received any reports about the incidents described.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing letter containing the comments of the Brotherhood of Locomotive Engineers and Trainmen and United Transportation Union have been served upon the following, in the manner indicated, this 10th day of February, 2011:

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