

228825
228826
228827

February 9, 2011

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

Re: STB Finance Docket No. 35410, 35411, 35418

**ENTERED
Office of Proceedings**

Dear Madam Chief:

FEB 15 2011

**Part of
Public Record**

Attached are my comments in the above referenced proceeding.

Respectfully submitted,



Peter Thompson

President Local 278

**Before the
SURFACE TRANSPORTATION BOARD**

**FINACE DOCKET NO. 35410
ADRIAN&BLISSFIELD RAIL ROAD COMPANY
-CONTINUANCE IN CONTROL EXEMPTION-
JACKSON AND LANSING RAILROAD COMPANY**

**ENTERED
Office of Proceedings**

FEB 15 2011

**Part of
Public Record**

**FINANACE DOCKET NO. 35411
JACKSON & LANSING RAILROAD COMPANY
-LEASE AND OPERATIONS EXEMPTION-
LINES OF THE NORFOLK SOUTHERN RAILWAY COMPANY
IN INGHAM AND JACKSON COUNTIES, MI**

**FINANCE DOCKET NO. 35418
JACKSON & LANSING RAILROAD COMPANY
-TRACKAGE RIDHTS EXEMPTION -
NORFOLK SOUTHERN RAILWAY COMPANY**

**COMMENTS ON THE PETITION TO REVOKE FILED BY THE
BROTHERHOOD OF LOCOMOTIVE ENGINEERS AND TRAINMAN
AND THE
UNITED TRANSPORTATION UNION**

In their response to this petition the ABDF / JAIL states that it expects to establish interchange with the CSXT. And anticipates establishing one with the CN and that competition thereby would be enhanced. What they fail to state is that shippers already had the same **established** interchange points available with the NS the lines prior operator. They also failed to establish a plan for the shippers using these points in the interim. To date they have not explained how the obvious enticement of lease credits will some how increase competition.

For the shippers that formerly shipped exclusively with the NS this transaction will only add another entity into the mix slowing shipments and increasing costs. Since operations switched from NS to ABDF/JAIL all shippers have seen large increases in shipping and dwell times. In December 2010 and January 2011 the ABDF/JAIL often went days without affecting an interchange. The number of ABDF/JAIL cars in the NS Jackson yard filled tracks 10 and 11 with some cars failing to move for over a week. This has not only affected the ABDF/JAIL shippers, but has caused undo congestion in Jackson yard affecting the NS's ability to meet its customer demands.

The ABDF/JAIL states that assertions made in the petition that they are under capitalized. Do not hold water. They also assert the line is good repair. However they ignore the fact that the NS had repeatedly postponed scheduled track rehabilitation and resurfacing since purchasing it in 1999. This has led to the line being drop from a Class 2 to a Class 1 with maximum speed of 10 mph. The estimated cost of the project \$1.75 million was to maintain the line at the current Class1 level and prevent further degradation. ABDF/JAIL President Mark Dobronski projects they will employ 21 persons at wages comparable to those of a Class 1 employees (see Dobronski verified statement) based on a 40 hr work week that puts payroll alone in excess of \$1. 5 million per year. According to a Dunn and Bradstreet report for the ADRIAN & BLISSFIEL RAIL ROAD COMPANY has high to medium risk of financial risk over the next 12 months. With a rating of 4 (5 being the High 1 the Low) with \$ 1 million being the highest credit reported. With 1.5 million in payroll and based on projections of what the line produces in revenue it is hard to see how ABDF/JAIL can operate let alone raise the capital needed just to maintain the line at current levels. This was further evidenced in late December 2010 when ABDF/JAIL lost one of its locomotives to maintenance issues. It took over a month for ABDF/JAIL to get a replacement locomotive while carloads set undelivered for days or weeks. With only one 1950's era locomotive left operational. ABDF/JAIL could not move over 20 loads out of the interchange at the NS Jackson yard. This evidence speaks for itself and is proof that ABDF/JAIL is truly under capitalized.

ABDF/JAIL states that the assertion that the Exemption will compromise safety is speculative. However in only the short time that ABDF/JAIL has operated the line. The amount safety rule and regulation violations are staggering. On 10-22-10 while affecting an interchange with NS at Jackson the ABDF/JAIL crew failed to properly perform a Class 1 air brake test leaving Jackson with car CNA 407127 clearly labeled as a Bad Order. (See Exhibit A) The car was later returned and repaired by the NS at Jackson. In the early morning of November 12 2010 aprox. 3:30a after leaving cars track 11 at Jackson yard, the ABDF/JAIL crew attempted to return to the west end of the yard to pickup their cars and became lost. They called NS Trainmaster Mike George and told him of their problem. Mr. George asks them if they were qualified. They replied yes but they had never had go around this way but they had a map however they had come to end of Industrial Track. Mr. George told them go back to the engine lead track and stay to the right and proceed west. When the NS B-22 came on duty at 6:30a that morning they discovered that ABDF/JAIL crew actually proceed west through a private industry and out west end back to their pickup. The crew restored the switches and reported it to Mr. George.

The ABDF/JAIL has also had problems in knowing what tracks it leases and what tracks belong to others. ABDF/JAIL placed over 60 storage cars on tracks belonging to the CSXT and blocked them from servicing the Hart Truss Company. They also placed storage cars in a track belonging to RSDC Steel. Blocking them from using the track for there own use.

In ABDF/JAIL response to the Petition they state that are required to maintain the Line to Class I standards the maximum speed for this class is 10 MPH. On 32 or more occasions the ABDF/JAIL violated that speed. Violations ranged from 10% to 140% over the maximum authorized speed. (Exhibit B-1 thru B-32) these speeds were recorded off a scanner located at

mile post LZ 1 outside of Jackson. On December 27, 2010 at 18:15 EST the ABDF/Jail crew passed an absolute stop signal at North Lansing on the CSXT Plymouth Subdivision. After realizing their mistake the crew then backed up with out permission and without protecting move. The resulting investigation showed that the crew did not possess the proper bulletins and the ones in their possession were over 3 weeks old. Even after avoiding what could have been a catastrophe. The ABDF/JAIL continued speed, continued to ignore rules. On January 22, 2011 the ABDF/JAIL crew after yarding their train failed to properly line their route and ran thru 15# switch at the East end of Jackson. (See Exhibit C) This record shows that ABDF/JAIL crews are not trained to the same levels as their NSR and CSXT counterparts as the ABDF/JAIL alleges. The ABDF/JAIL likens this petition to a Red Herring and asks you disregard some its points. I can only say that something stinks, but it's not this petition.

A point not brought out by this Petition but none the less should be addressed, is the lack of environmental impact study. Although this Transaction would normally be exempt in this case there are both legal and extenuating circumstances not covered under 49 C.F.R. § 11804. The Lansing Manufactures Railroad actually splits property owned by the former General Motors Corporation. These properties are now owned or under control of the United States Government. Parts of these properties immediately adjacent to the line have been declared EPA Hazardous Waste sites. The problem lies with who is responsible for the contamination. As ground water flows thru aquifer it carries the contamination to other sites. The only way to determine where the contamination occurred is with a study. If in fact in prior years the contamination occurred on Railroad Properties it could have easily spread to the adjacent properties. This could cause US Government to bare the burden of undo costs. Also these properties are trying to be redeveloped with hope recouping funds spent and the creation of new Jobs. However with out a study to see how this transaction would affect this redevelopment the Board can not make an informed decision. With these properties under the control of other US Governmental Agencies must they be asked to weigh in? Or in fact does this Board have the legal authority under these facts to allow a change in control that may affect properties under the control of other Agencies? These questions would have been apparent to the Board if the ABDF/JAIL would have included more detailed maps in its filing, (See Exhibits C 1 thru C 3)

CONCLUSION

Based on the facts out lined and by the Petitioners I respectfully request the Board grant the Petition to Revoke.

Respectfully submitted,



Peter Thompson
President Local 278
1230 Knoll wood
Jackson, MI 49203

Date: 10.22.10Shift: 1st (2nd) 3rd[illegible]

INSTRUCTIONS:

1. Fax to Yardmaster
2. Fax to General Foreman's Office At: 419-381-5524
4. Fax to CYO At: 800-618-5455

```

...
L823
Print
* * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train: ..... OR Eq ID: ..... ) Date: 10/22/10
+-----+

```

Scanner Report For Location: JACKSON, MI

Index	Date,Time	Loc	Track	Dir	Train	Speed	Axles	Voltage	Error
... 5987	10/22,23:31	LZ1	SINGLE	S		13	8	0.0	
.. 5987	10/22,23:31	LZ1	SINGLE	S		13	8	0.0	
... 5986	10/22,04:07	LZ1	SINGLE	N		9	68	0.0	
.. 5986	10/22,04:07	LZ1	SINGLE	N		9	68	0.0	
... 5986	10/22,04:07	LZ1	SINGLE	N		9	68	0.0	
.. 5985	10/22,01:29	LZ1	SINGLE	S		12	36	0.0	
... 5985	10/22,01:29	LZ1	SINGLE	S		12	36	0.0	
.. 5985	10/22,01:29	LZ1	SINGLE	S		12	36	0.0	

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=Exit

11/01/10 07:56:00

Ex B-1

```

...
L823
Print
* * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train: ..... OR Eq ID: ..... ) Date: 10/25/10
+-----+
Scanner Report For Location: JACKSON. MI
Index   Date,Time   Loc   Track   Dir   Train   Speed Axles   Voltage Error
... 5991   10/25.23:55   LZ1   SINGLE   S           17    76    0.0

```

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=Exit

11/01/10 07:56:47

Ex - B - 2

L823

Print

* * Scanner Report Summary * *

+-----+
(Loc: LZ1 OR Train: OR Eq ID:) Date: 10/27/10
+-----+

Scanner Report For Location: JACKSON, MI

Index	Date,Time	Loc	Track	Dir	Train	Speed	Axles	Voltage	Error
... 5994	10/27.03:00	LZ1	SINGLE	N		11	8	0.0	
.. 5993	10/27.01:08	LZ1	SINGLE	S		12	80	0.0	

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=Exit

11/01/10 07:57:15

Ex - B-3

```

...
L823
Print
* * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train: ..... OR Eq ID: ..... ) Date: 10/28/10
+-----+
Scanner Report For Location: JACKSON. MI
  Index   Date,Time   Loc   Track   Dir   Train   Speed   Axles   Voltage Error
... 5997   10/28.23:55   LZ1   SINGLE   S   JAIL0015   14     76     0.0
.. 5996   10/28.02:34   LZ1   SINGLE   N   JAIL0013   10     60     0.0
... 5995   10/28.00:16   LZ1   SINGLE   S   JAIL0012   15     36     0.0

```

F1=Help

F4=RawData F5=TrnInfo F6=Refresh
 F11=Menu F12=PrevScn
 10/29/10 18:49:10

Ex-B-4

```

...
L823
Print
* * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train: ..... OR Eq ID: ..... ) Date: 10/29/10
+-----+
Scanner Report For Location: JACKSON, MI
  Index   Date,Time   Loc   Track   Dir   Train   Speed Axles   Voltage Error
... 5998   10/29.04:19   LZ1   SINGLE   N   JAIL0016   11    72    0.0

```

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=PrevScn

10/29/10 18:47:12

Ex-B-5

```

...
L823
Print
* * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train: ..... OR Eq ID: ..... ) Date: 10/30/10
+-----+
Scanner Report For Location: JACKSON, MI
  Index   Date,Time   Loc   Track   Dir   Train   Speed   Axles   Voltage   Error
... 6000   10/30.02:45   LZ1   SINGLE   N   JAIL0018   10     36     0.0
.. 5999   10/30.00:29   LZ1   SINGLE   S           12     28     0.0
... 5999   10/30.00:29   LZ1   SINGLE   S           12     28     0.0
.. 5999   10/30.00:29   LZ1   SINGLE   S   JAIL0017   12     28     0.0

```

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=Exit

11/01/10 07:58:46

Ex - B-6

```

...
L823
Print
* * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train: ..... OR Eq ID: ..... ) Date: 11/04/10
+-----+
Scanner Report For Location: JACKSON, MI
  Index   Date,Time   Loc   Track   Dir   Train   Speed Axles   Voltage Error
... 6007   11/04,23:41   LZ1   SINGLE   S   JATL0035   13    40    0.0
... 6006   11/04,02:22   LZ1   SINGLE   N   UNKNOWN    10    44    0.0
... 6005   11/04,00:35   LZ1   SINGLE   S           15    44    0.0

```

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=Exit

11/08/10 09:33:55

Ex - B-7

...
L823 Print
 * * Scanner Report Summary * *

+-----+
(Loc: LZ1 OR Train: OR Eq ID:) Date: 11/07/10
+-----+

Scanner Report For Location: JACKSON, MI

Index	Date,Time	Loc	Track	Dir	Train	Speed	Axles	Voltage	Error
... 6010	11/07,21:29	LZ1	SINGLE	N		12	4	0.0	
.. 6009	11/07,19:25	LZ1	SINGLE	S	JAIL0039	12	48	0.0	

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=Exit

11/08/10 09:33:09

Ex - B-7

```

...
L823
Print
* * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train: ..... OR Eq ID: ..... ) Date: 11/10/10
+-----+
Scanner Report For Location: JACKSON, MI
  Index   Date,Time   Loc   Track   Dir   Train   Speed   Axles   Voltage Error
... 6014   11/10,02:30   LZ1   SINGLE   N           9       24       0.0
.. 6014   11/10,02:30   LZ1   SINGLE   N           9       24       0.0
... 6014   11/10,02:30   LZ1   SINGLE   N           9       24       0.0
.. 6013   11/10,00:31   LZ1   SINGLE   S   JAIL0044   15       24       0.0

```

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=Exit

11/10/10 07:52:29

Ex - B-8

L823

Print

* * Scanner Report Summary * *

(Loc: LZ1 OR Train: OR Eq ID:) Date: 11/12/10

Scanner Report For Location: JACKSON, MI

Index	Date,Time	Loc	Track	Dir	Train	Speed	Axles	Voltage	Error
... 6016	11/12,02:27	LZ1	SINGLE	N		11	44	0.0	
.. 6016	11/12,02:27	LZ1	SINGLE	N		11	44	0.0	
... 6016	11/12,02:27	LZ1	SINGLE	N	JAIL0047	14	44	0.0	
.. 6015	11/12,00:12	LZ1	SINGLE	S	JAIL0048	14	108	0.0	

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=Exit

11/12/10 08:39:40

Ex - B-9


```

...
L823          Print
              * * Scanner Report Summary * *
+-----+
( Loc: LZ1    OR Train: ..... OR Eq ID: ..... ) Date: 11/16/10
+-----+
Scanner Report For Location: JACKSON, NJ
  Index   Date,time   Loc   Track   Dir   Train   Speed Axles Voltage Error
... 6018   11/16,03:07   LZ1   SINGLE   N   JAIL0053   10   180   0.0
.. 6017   11/16,00:24   LZ1   SINGLE   S   JAIL0054   13   76   0.0

```

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=Exit

11/16/10 08:07:52

Ex - B-10

```

...
L823
Print
* * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train: ..... OR Eq ID: ..... ) Date: 11/19/10
+-----+
Scanner Report for Location: JACKSON, MI
Index   Date,Time   Loc   Track   Dir   Train   Speed   Axles   Voltage Error
... 6022   11/19,03:24   LZ1   SINGLE   N   JAIL0063   10   112   0.0
.. 6021   11/19,00:11   LZ1   SINGLE   S   JAIL0062   12   156   0.0

```

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=Exit

11/19/10 12:10:40

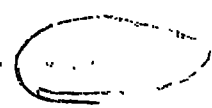
Ex-B-11

Ex-B-12

[illegible]

Ex-B-13

Ex-B-16

```

Print
L823      * * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train: _____ OR Eq ID: _____ ) Date: 11/30/10
+-----+
Scanner Report For Location: JACKSON, MI
Index   Date,Time   Loc   Track   Dir   Train   Speed   Axles   Voltage   Error
- 6030   11/30,03:13   LZ1   SINGLE   N   JAIL0075   8       76       0.0
- 6029   11/30,00:32   LZ1   SINGLE   S   _____   13      112       0.0

```

F1: Help

F4: RawData

F5: TrnInfo

F6: Refresh

F11: Menu

F12: PrevScn

12/10/10 08:02:58

Ex - B-17

Print
L823 * * Scanner Report Summary * *

+-----+
(Loc: LZ1 OR Train: _____ OR Eq ID: _____) Date: 12/02/10
+-----+

Scanner Report For Location: JACKSON, MI

Index	Date, Time	Loc	Track	Dir	Train	Speed	Axles	Voltage	Error
6032	12/02,04:44	LZ1	SINGLE	N	JAIL0078	8	24	0.0	
6031	12/02,02:10	LZ1	SINGLE	S		11	36	0.0	
6031	12/02,02:10	LZ1	SINGLE	S	JAIL0079	11	56	0.0	

F1=Help

F4=RawData

F5=TrainInfo

F6=Refresh

F11=Menu

F12=PrevSchn

12/10/10 08:03:53

Ex - B-18

Print

L823

* * Scanner Report Summary * *

+-----+
(Loc: LZ1 OR Train: OR Eq ID:) Date: 12/02/10
+-----+

Scanner Report For Location: JACKSON, MI

Index	Date, time	Loc	Track	Dir	Train	Speed	Axles	Voltage	Erro
6034	12/02,23:30	LZ1	SINGLE	N	JAIL0081	9	164	0.0	
6033	12/03,20:46	LZ1	SINGLE	S		13	8	0.0	

F1=Help

F4=RawData

F5=ImInfo

F6=Refresh

F11=Menu

F12=PrevScr

12/10/10 08:04:06

Ex-B-19

```

Print
1823      * * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train: _____ OR Eq ID: _____ ) Date: 12/07/10
+-----+
Scanner Report For Location: JACKSON, MI
  Index   Date,Time   Loc   Track   Dir   Train   Speed Axles   Voltage Error
  ---
  6037    12/07,11:49  LZ1   SINGLE  N     Train     9      5      0.0
  6036    12/07,09:40  LZ1   SINGLE  N     Train     10     84     0.0
  6035    12/07,01:59  LZ1   SINGLE  S     Train     13     128    0.0

```

F1=Help

F4=RawData

F5=TrainInfo

F6=Refresh

F11=Menu

F12=PrevScn

12/10/10 08:04:25

Ex-B-20

```

Print
1825 * * S Scanner Report Summary P 1
-----
( Loc: LZ1 OR Train: _____ OP Eq ID: _____ ) Date: 12/15/2010
+-----+
Scanner Report For location: JACKSON, MI
Index Date,Time Loc Track Dir Train Speed Axles Voltage Vri
- 6041 12/15,10:42 LZ1 SINGLE N 110 9 48 0.0
- 6040 12/15,00:44 LZ1 SINGLE S 12 64 0.0

```

F1=Help

F4=RawData

F5=TrainInfo

F6=PosFlash

F11=Menu

F12=Exit

12/20/10 09:38:17

Ex-B-21

```

      P. im
1873      * * Scanner Report Summary
+-----+-----+-----+-----+-----+-----+-----+-----+
( Loc: LZ1   OR Train: _____ OP Eq ID: _____ ) Date: 12/19/2010
+-----+-----+-----+-----+-----+-----+-----+-----+
Scanner Report For Location: JACKSON MI
Index   Date, Time   Loc   Track   Dir   Train   Speed   Az/Lea   Voltage
--- 6043 12/17, 17:47  LZ1   SINGLE  N     JAC0094  10      84      0.0
--- 6042 12/19, 14:27  LZ1   SINGLE  S     C       12      96      0.0

```

F1=Help

F4=RawData

F5=CtrlInfo

F6=Refresh

F11=Menu

F12=Exit

12/20/10 09:30:00

Ex-B-22

1000

File 120 03 120 12/20/80

Sample Report for Location Jackson, MI

Index	Date, Time	Loc	Index	File	Time	Speed (mph)	Altitude (ft)
0004	12/20, 23:40	120	01400	0		0.0	
0005	12/20, 01:02	121	01401	0		0.0	
0002	12/20, 01:05	121	01402	0		0.0	

File Name

12/20/80

12/20/80 12:23:40
File Name 12/20/80 12:23:40

Ex - B-23

8

Ex-B-26

11

DATE	DESCRIPTION	AMOUNT	CHECK NO.	BANK
12/1/78	1000	1000.00		
12/2/78	1000	1000.00		
12/3/78	1000	1000.00		
12/4/78	1000	1000.00		
12/5/78	1000	1000.00		
12/6/78	1000	1000.00		
12/7/78	1000	1000.00		
12/8/78	1000	1000.00		
12/9/78	1000	1000.00		
12/10/78	1000	1000.00		

12/11/78 1000 1000.00

12/12/78 1000 1000.00

Ex - B-24



Ex - B-27

9

Ex-B-28

80

Ex B-29

Print

1928

* * * Scanner Report Summary * *

(Loc: L21 OP Train: OR (q To:) Date: 12/15/10

Scanner Report For Location: JACKSON MS

Index	Date,Time	Loc	Track	Dir	Train	Speed	Notes	Voltage, V. per
8040	12/15,00:44	L21	SINCL	S		12	64	0.0

Ex Help

Ex RawData

Ex VtrInfo

Ex Refresh

Ex Menu

Ex PrevSch

12/15/10 07:26.33

Ex-B-30

1223

* 4 Scanner Report Summary

12/19/10 12:47:10 ON 84 00 Date: 12/19/10

Scanner Report for Location JACKSON MI

Index	Date/Time	Loc	Track	Dir	Train	Speed	AXLES	Voltage	Loc
0043	12/19/10 12:47	121	SINGLE	N	JAN10094	10	87	0.0	
0049	12/19/10 12:47	121	SINGLE	N		17	86	0.0	

12/19/10

12/19/10

12/19/10

12/19/10

12/19/10

12/19/10

12/19/10 12:47:10

Ex-B-31

12/20
 Scanner Report Summary
 (Location) (R Train) (R Ed) (R Ed) Date 12/20/00
 Scanner Report for Location JACKSON, MI

Index	Date	Time	Loc	Track	Dir	Train	Speed	Arches	Voltage	Error
6044	12/20	22:52	L7	SINGLE	S		13	44	0.0	
6045	12/20	23:52	L7	SINGLE	S		13	44	0.0	

File Help

File Read Data

File Write Data
 File Menu
 12/20/00 11:52:36

Ex-B-32

Report # _____

RUN-THROUGH SWITCH INCIDENT FORM

ENGINEERING SECTION

1. First Notification: Assistant TM NATE PARSONS
(Reporting Individual's Name/Title/Date/Time)
2. Engineering Dept. employee receiving notification: GARY BISHOP A.T.S.
(Name/Title)
3. Specific identification/location of switch: #15 SW East end of Jackson Rd
4. Engineering Dept. Supervisor: Ken Phinell
(Name/Title)
5. After confirming switch was run-through, the following Transportation Supervisor was notified: Assistant TM Parsons
(Name/Title/Date/Time)
6. Costs: \$200
7. Transportation Supervisor concurs with run-through switch finding: Yes

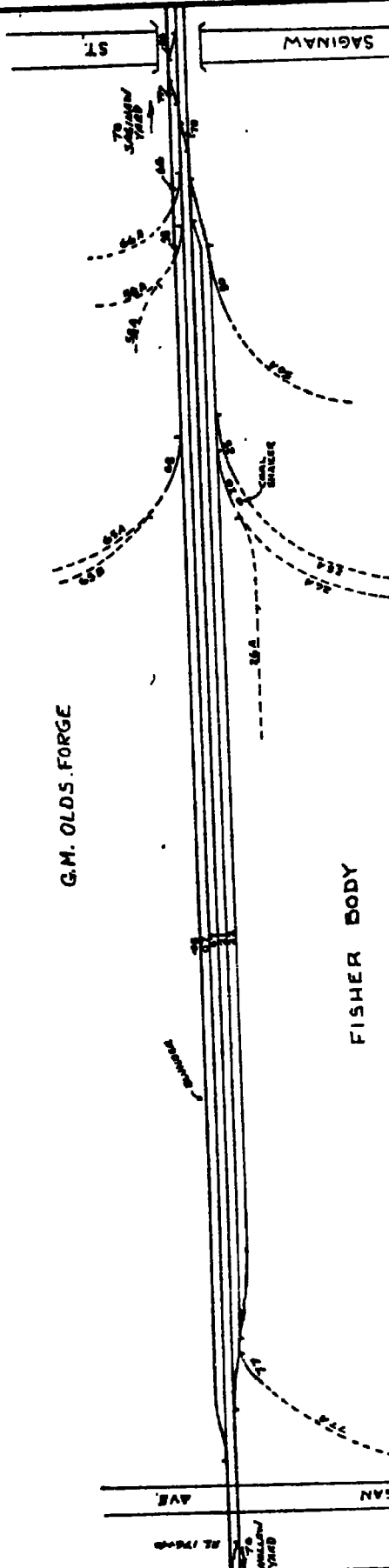
TRANSPORTATION SECTION

1. First Notification: Nate Parsons
(Reporting Individual's Name/Title/Date/Time)
 2. Transportation Dept. employee receiving notification: Nate Parsons
(Name/Title)
 3. Specific identification/location of switch: #15 East end of Jackson
 4. Transportation Dept. Supervisor: _____
(Name/Title)
 5. The following Engineering Dept. Supervisor was notified: _____
(Name/Title/Date/Time)
 6. Last train/engine ID to have used the switch: SAL TRAIN
 7. Crew Members: Conductor: _____
Engineer: _____
Brakeman: _____
LET: _____
ACT: _____
Utility: _____
 8. Crew handling: _____
- Concurrence: Div Supt _____ Div Engr _____

Ex C

Ex-C-2

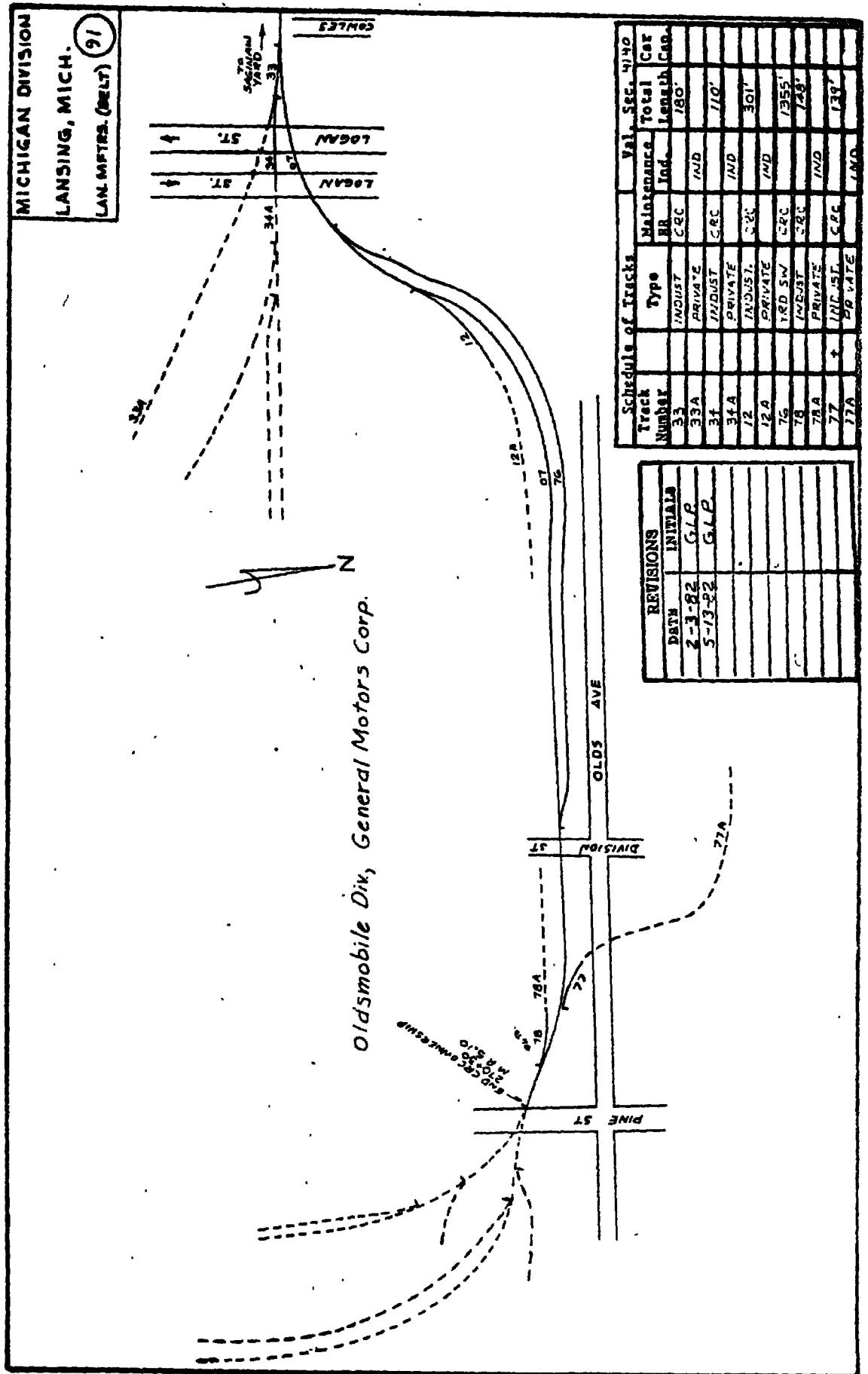
MICHIGAN DIVISION
LANSING, MICH.
LAN. METRS. (BELT) 88



Schedule of Tracks				Val. Sec. 4140			
Track Number	Type	Maintenance	Total Length	Ind.	Car	Length	Car
21 ✓	YRD SW	CRC	1680'			200'	
22 ✓	↓	↓	1380'				
23	INDUST.	↓	84'				
24	PRIVATE	IND	84'				
25A	INDUST.	CRC	84'				
26	PRIVATE	CRC	2490'				
27A	YRD SW	CRC	84'				
28	INDUST.	CRC	158'				
29	PRIVATE	IND	161'				
30A	INDUST.	CRC					
31A	PRIVATE	IND					
32	INDUST.	CRC					

REVISIONS	
DATE	INITIALS
2-2-82	G.L.P.

Ex-C-3



CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing letter containing my comments have been served upon the following by US mail.

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