

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**

**FINANCE 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 RIGHTS 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 somehow 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 undue 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

Shift: 1st 2nd 3rd

Date: 10.22.10

[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   JAIL0035   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   SINGLI   N           11      44      0.0
.. 6016   11/12,02:27   LZ1   SINGLE   N           11      44      0.0
... 6016   11/12,02:27   LZ1   SINGLI   N   JAIL0047   11      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

```

...
L829
Print
* * Scanner Report Summary * *
+-----+
( Loc: LZ1 OR Loc: OR for IP: ) Date: 11/13/10
+-----+
Scanner Report For Location: JACKSON, MI
Index Date, Time Loc Track Alt Time Speed Axles Voltage Error
.. 6016 11/13,02:27 LZ1 SINGLE N 0011.0042 11 44 0.0
.. 6016 11/13,02:27 LZ1 SINGLE N 0011.0042 11 44 0.0
.. 6016 11/13,02:27 LZ1 SINGLE N 0011.0042 11 44 0.0
.. 6016 11/13,00:13 LZ1 SINGLE N 0011.0043 14 08 0.0

```

F1=Help

14-810013 15-7-01000 16-8-00000
 17-0-00000 18-0-00000
 11/13/10 02:27:03

Ex - B-9

```

...
L823          Print
              * * Scanner Report Summary  * *
+-----+
( Loc: LZ1    OR Train: ..... OR Eq 13: ..... ) Date 11/16/10
+-----+
Scanner Report For Location: JACKSON, MI
  Index   Date,time   Loc   Track   Dir   Train   Speed  Axes   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=TrainInfo

F6=Refresh

F11=Menu

F12=Exit

11/16/10 08:07:52

Ex - B-10

```

Print
L923      * * Scanner Report Summary * *
+-----+
( Loc: L21   OR Train. .... OR Eq ID: ..... ) Date: 11/19/10
+-----+
Scanner Report for Location. JACKSON, NJ
  Index   Date,Time   Loc   Track   Dir   Train   Speed   Axles   Voltage Error
... 6022   11/19,03:24   L21   SINGLE   N   JAIL0061   10   112   0.0
.. 6021   11/19,00:11   L21   SINGLE   S   JAIL0062   12   156   0.0

```

F1=Help

F4=RawData F5=TrainInfo F6=Refresh
 F11=Menu F12=Exit
 11/19/10 14:10:40

Ex-B-11

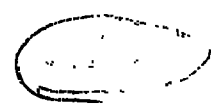
Ex-B-12

0
The following information was obtained from the file of the
Department of the Interior, Bureau of Land Management, regarding
the land owned by the United States in the State of California.
The land is located in the County of San Diego, California.
The land is owned by the United States of America.

The land is located in the County of San Diego, California.
The land is owned by the United States of America.

Ex B-14

1. The following information was obtained from the records of the
 2. Bureau of the Census, Washington, D. C., on the subject of
 3. the above named individual, who was born on the 12th day of
 4. January, 1925, at the City of New York, New York, and who
 5. is now residing at the City of New York, New York.



6. The following information was obtained from the records of the
 7. Bureau of the Census, Washington, D. C., on the subject of
 8. the above named individual, who was born on the 12th day of
 9. January, 1925, at the City of New York, New York, and who
 10. is now residing at the City of New York, New York.

11. The following information was obtained from the records of the
 12. Bureau of the Census, Washington, D. C., on the subject of
 13. the above named individual, who was born on the 12th day of
 14. January, 1925, at the City of New York, New York, and who
 15. is now residing at the City of New York, New York.

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 11/30,00:02 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	Erro
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	36	0.0	

F1=Help

F4=RawData

F5=TrainInfo

F6=Refresh

F11=Menu

F12=PrevScn

12/10/10 08:03:58

Ex - B-18

```

Print
L828      * * Scanner Report Summary * *
+-----+
( Loc: LZ1   OR Train:      OR Eq ID:      ) Date 12/03/10
+-----+
Scanner Report For Location: JACKSON, MI
Index   Date,Time   Loc   Track   Dir   Train   Speed Axles Voltage Error
--  --  --  --  --  --  --  --  --  --
6034    12/03,23:30  LZ1   SINGLE  N     JAIL0081  9    164    0.0
6033    12/03,20:46  LZ1   SINGLE  S     JAIL0081  13    8      0.0

```

F1=Help

F4=RawData

F5=TrnInfo

F6=Refresh

F11=Menu

F12=PrevScr

12/10/10 08:04:04

Ex-B-19

```

Print
L923      * * 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   Err
  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=TinInfo

F6=Refresh

F11=Menu

F12=PrevSch

12/10/10 08:04:25

Ex-B-20

Print
 LB24 * * Scanner Report Summary * *
 (Loc: LZ1 OR Train: _____ OP Eq ID: _____) Date: 12/15/2011
 Scanner Report For Location: JACKSON MI

Index	Date,Time	Loc	Track	Dir	Train	Speed	Axles	Voltage	Eq
6041	12/15,10:42	LZ1	SINGLE	N		9	48	0.0	
6040	12/15,00:44	LZ1	SINGLE	S		12	64	0.0	

F1:Help

F4:RawData F5:TrainInfo F6:PosCoach
 F11:Menu F12:Exit
 12/20/10 09:39:54

Ex-B-21

Print
 1872 * * Scanner Report Summary * *
 (Loc: LZ1 OR Train: OR Eq ID.) Date: 12/19/2011
 Scanner Report For Location: JACKSON, NJ

Index	Date, Time	Loc	Track	Dir	Train	Speed	Axes	Voltage
6043	12/19, 17:47	LZ1	SINGLE	N	JACKSON94	10	84	0 0
6042	12/19, 14:27	LZ1	SINGLE	S		12	96	0 0

F1=Help

F4=Refresh

F5=Print

F6=Refresh

F11=Menu

F12=Exit

12/20/10 00:00:00

Ex - B-22

[illegible]

1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 26

Speed (MPH)	Altitude (Feet)
15	0.0
30	0.0
45	0.0

Index	Date, Time	Loc	Temp	Dir	Wind
6054	12/20 20:40	ZI	51.4	S	10
6053	12/28, 08:32	L/L	51.0	N	10
6052	12/28 07:25	L/L	51.0	S	10

17-00000000 10-11-10 10-11-10
11-11-10 10-11-10
12-11-10 10-11-10

Ex - B-23

1974

1975

1976

1977

1978

1979

1980

1981

1982

1983

1984

1985

1986

1987

1988

1989

1990

1991

1992

1993

1994

1995

1996

1997

1998

1999

2000

2001

2002

2003

2004

2005

2006

2007

Ex-B-25

8

Ex-B-26



Ex - B-27

9

Ex-B-28

80

Ex B-29

```

LS23          * * Station Report Summary * *
+-----+-----+-----+-----+-----+-----+-----+-----+
( Loc: L21   OR Train:          OR Dir:          ) Date: 12/15/00
+-----+-----+-----+-----+-----+-----+-----+
Scanner Report For Location: JACKSON 00
  Index   Date,Time   Loc   Track   Dir   Train   Speed Miles   Voltage Error
.. 6040   12/15,00:44   L21   STNUC   S          12       64       0.0

```

14 "RawData" "F12-Data" "F12-Release"
 "F12-MOD" "F12-Rev506"
 12/15/10 07:26.33

Ex-B-30

1/22/10
 Scanner Report Summary
 Location: OR Train OR ID: 12/22/10
 Scanner Report for Location: JACKSON, MI

Index	Date Time	Loc	Track	Dir	Train	Speed	Amper	Voltage
0043	12/19, 12:47	123	SINGLE	N	08110094	10	64	0.0
0044	12/19, 12:52	123	SINGLE	N		17	66	0.0

12/23/10 11:40:10
 12/23/10 11:40:10
 12/23/10 11:40:10

Ex-B-31

10/10

0.00

Scanner Report Summary

Location: OR Train Date: 12/20/11

Scanner Report: Location: JACKSON, MI

Index	Date Time	Loc	Track	Dir	Train	Speed	Axles	Voltage	Power
6044	12/20 20:52	171	SINGLE	S		12	44	0.0	
6045	12/20 20:52	171	SINGLE	S		12	44	0.0	

Help

Review

Print Info
Print
12/29/10 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 Musella
(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

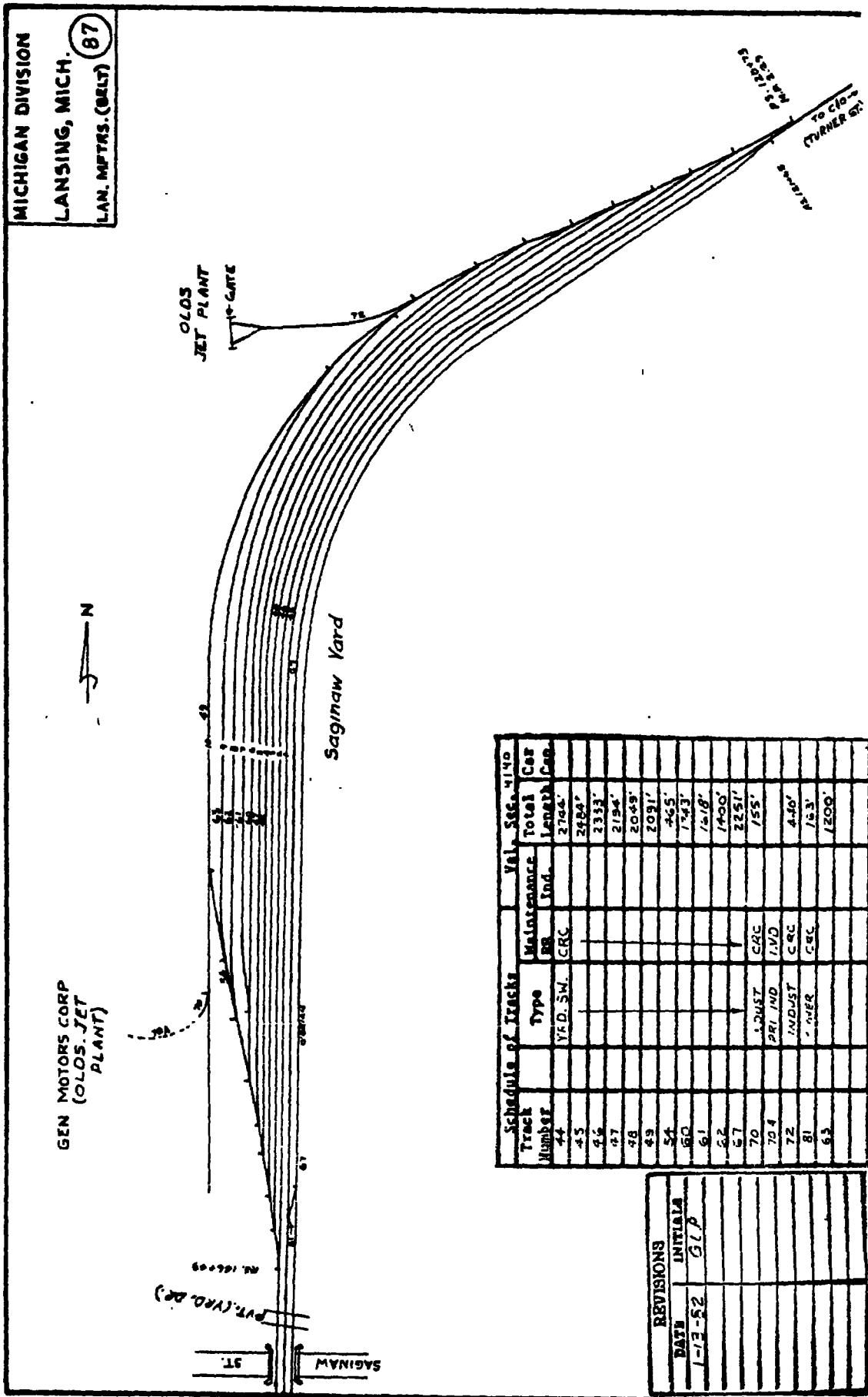
TRANSPORTATION SECTION

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 Rd
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: SAIL TIRMIN
7. Crew Members: Conductor: _____
Engineer: _____
Brakeman: _____
LET: _____
ACT: _____
Utility: _____
8. Crew handling: _____

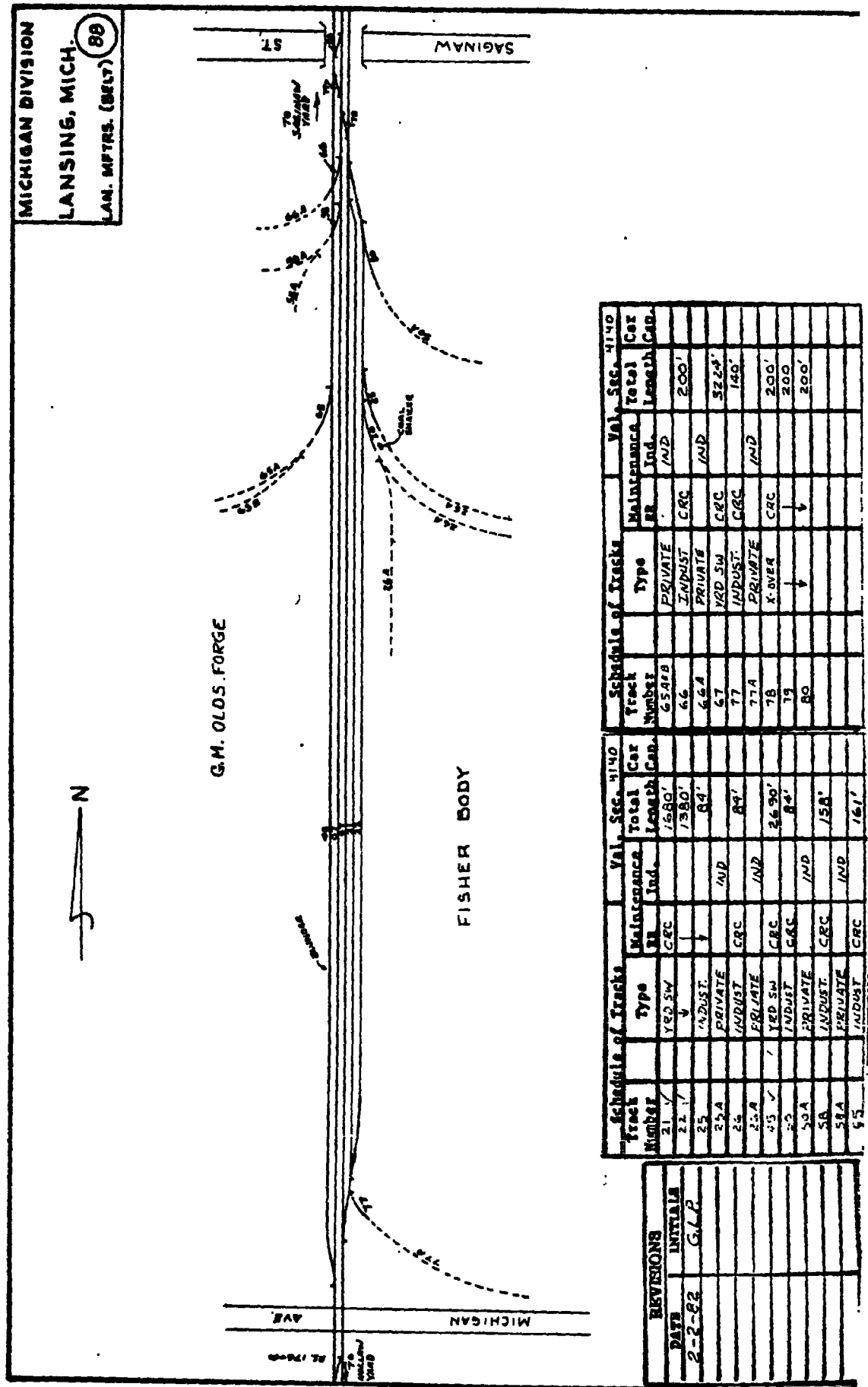
Concurrence: Div Supt _____ Div Engr _____

Ex C

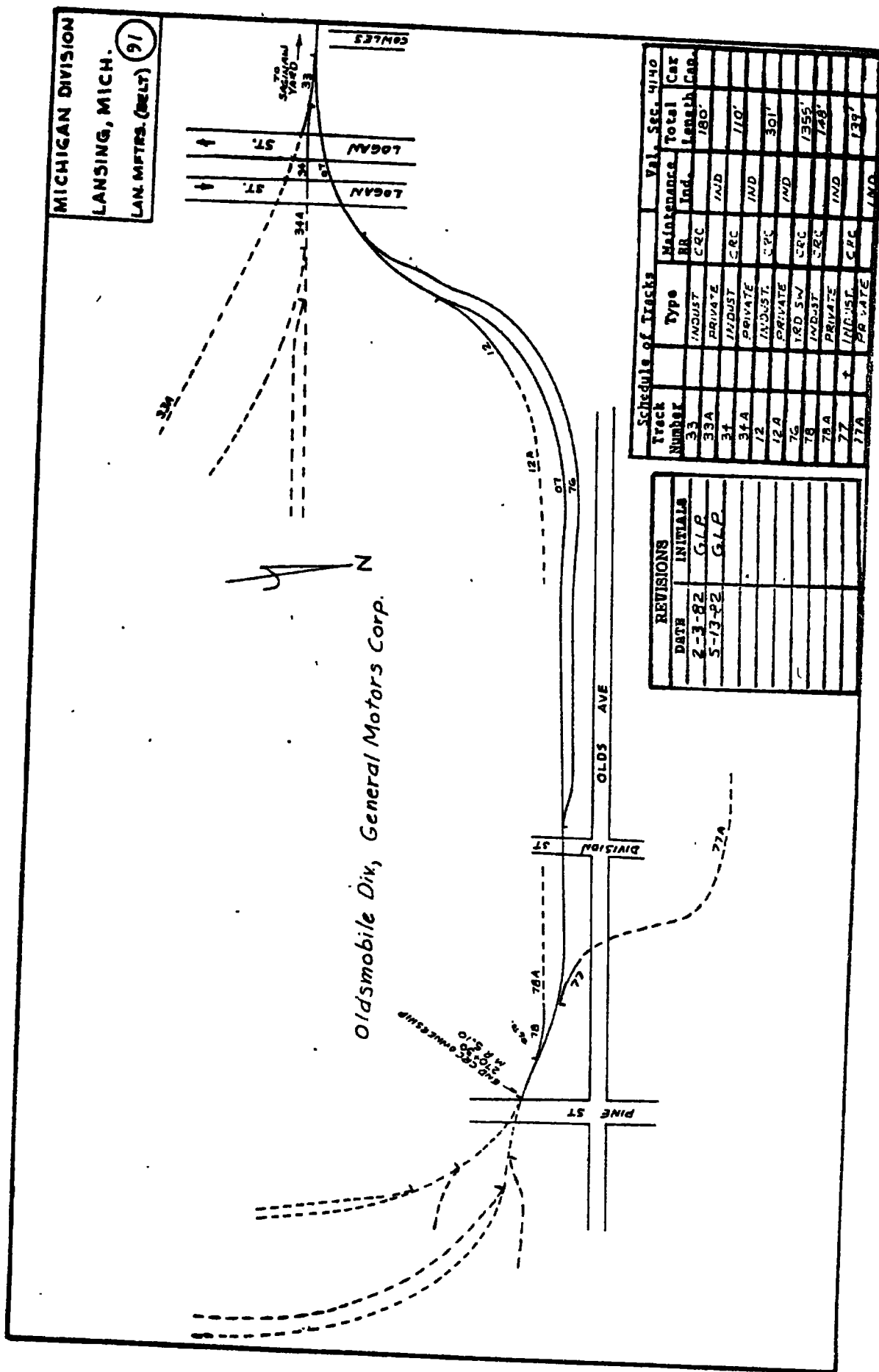
Ex-C-1



Ex-C-2



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.

PARTY OF RECORD

Fritz R Kahn
1920 N Street Nw 8Th Floor
Washington DC 20036-1601 US
Represents Yreka Western Railroad Company

PARTY OF RECORD

Karl Morell
1455 F Street Nw Suite 225
Washington DC 20005 US
Represents Adrian & Blissfield Rail Road Company
Louis Padnos Iron & Metal Company

PARTY OF RECORD

Harold A. Ross
1370 Ontario Street, Mezzanine
Cleveland OH 44113 US
Represents Brotherhood Of Locomotive Engineers And Trainmen

PARTY OF RECORD

James H. M. Savage
1750 K Street, N W, Suite 350
Washington DC 20006 US
Represents Adrian & Blissfield Rail Road Company

PARTY OF RECORD

David L. Meyer
2000 Pennsylvania Avenue, Nw
Washington DC 20006 US
Represents Norfolk Southern Railway Company

PARTY OF RECORD

Honorable Raymond E. Basham
P O Box 30036
Lansing MI 48909 US
Represents Honorable Raymond E. Basham

PARTY OF RECORD

Clinton J Miller, III

24950 Country Club Blvd , Suite 340

North Olmsted OH 44070 US

Represents United Transportation Union



Peter Thompson