



Brotherhood of Railroad Signalmen

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Michael S. Baldwin
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Secretary-Treasurer

307622

December 11, 2023
(via online at stb.gov)

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Docket Operations Facility
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

RE: Docket Number FD 36727 CSX Transportation, Inc.—Acquisition and Operation—Rail
Line of Meridian & Bigbee Railroad, L.L.C.

Comments of the Brotherhood of Railroad Signalmen

The Brotherhood of Railroad Signalmen (BRS) is filing comments concerning the above-referenced document that was printed in the November 9, 2023, Federal Register (Page No. 77403). The BRS is the duly recognized collective bargaining representative for roughly 10,000 signal employees who are responsible for inspection, installation, construction, repair, and maintenance of all signal systems and highway-rail grade crossings on all Class I railroads and various other Carriers in the United States. Our membership has a vested interest in the aforementioned acquisition which affects the safety of our members, local residents, railroad employees, equipment, and commodities, as well as the environment.

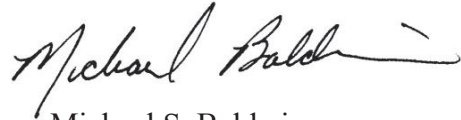
“The Application seeks Board approval for CSXT to acquire and operate the assets comprising the rail line of Meridian & Bigbee Railroad, L.L.C. (MNBR) that runs approximately 93.68 miles between the cities of Burkville, Ala., and Myrtlewood, Ala...”

While the BRS does not oppose CSX Transportation’s (CSXT) acquisition of MNBR, there are considerations bound to transitioning a Class III railroad to a Class I. As per the Federal Railroad Administration (FRA) Public Grade Crossing Inventory, maintenance of multiple crossings along this line is required. CSXT’s filing lacks clarification on its strategy for sustaining current assets. Moreover, the intended upgrade from Class III to Class I necessitates highly skilled personnel capable of conducting routine testing on existing assets and those CSXT intends to add. Although the BRS acknowledges this is outside of this agency’s jurisdiction, it is important to highlight these concerns for the record. It would be wise for CSXT to provide a comprehensive plan addressing the need for additional workers beyond those mentioned in its filing. Furthermore, the absence of a detailed plan from CSXT regarding asset maintenance and workforce expansion could have disastrous implications. Inadequate preparation could lead to operational disruptions, safety concerns at crossings, and potentially hinder the transition to a Class I status. Conversely, a comprehensive strategy outlining maintenance protocols and an adequate workforce could not only ensure the continued efficiency of the line but also enhance

safety measures. CSXT must recognize the significance of addressing these aspects transparently, not just for compliance but for the long-term sustainability and success of the transition.

BRS extends its gratitude for the opportunity to provide comments on the acquisition. If you have any questions, please contact my office at 540.622.6525.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Baldwin", with a stylized flourish at the end.

Michael S. Baldwin
President

Cc: All parties of record