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March 30, 2022

VIA ELECTRONIC FILING

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W., Room 1034
Washington, DC 20423-0001

Re: FD 36496, Application of the National Railroad Passenger Corporation under 49 U.S.C. § 24308(e) – CSX Transportation, Inc., and Norfolk Southern Railway Company

The Alabama State Port Authority (“ASPA”) and its rail common carrier operating division, Terminal Railway Alabama State Docks (“TASD”) – collectively, the “Port” – hereby file in response to the Order (the “Order”) of the Surface Transportation Board (the “Board”) served on March 23, 2022. The Order, among other things, directs each Party (as that term is defined at footnote 1 of the Order) to file its exhibits for the upcoming evidentiary hearing, and to advise the Board of any changes to the Party’s witness list by no later than March 30, 2022.

The Port understands that the Parties will submit under separate cover a list of joint exhibits, consisting of the various evidentiary filings tendered to the Board this year and last by the Parties, including each of the Port’s past evidentiary filings. Accordingly, the Port has attached hereto the exhibits and demonstratives that it will present in connection with its witness testimony during the upcoming evidentiary hearing that have not previously been presented to the Board, along with an exhibit table describing each of the new exhibits attached.

Finally, the Port continues to plan to call two witnesses at the evidentiary hearing, in keeping with its filing of February 14, 2022, as follows:

Robert M. Golden, General Manager, TASD

John C. Driscoll, Chief Executive Officer, ASPA (20 minutes)

Kindly advise the undersigned if you have any questions.

FLETCHER & SIPPEL LLC

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Respectfully submitted,

/s/ *R. A. Wimbish*

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**ATTORNEYS FOR ALABAMA STATE
PORT AUTHORITY AND TERMINAL
RAILWAY ALABAMA STATE DOCKS**

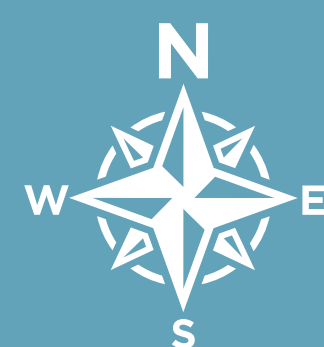
Attachments

**BEFORE THE
SURFACE TRANSPORTATION BOARD
DOCKET NO. FD 36496**

**APPLICATION OF THE NATIONAL RAILROAD PASSENGER CORPORATION UNDER 49
U.S.C. § 24308(e) – CSX TRANSPORTATION, INC. AND NORFOLK SOUTHERN
CORPORATION**

EXHIBIT LIST

Exhibit	Date Filed	Document Title / Description	Designation
PORT – 1A	03/30/22	TASD Operations – North End Map	Public
PORT – 1B	03/30/22	TASD Operations – South End Map	Public
PORT – 2	03/30/22	Northward View of Mobile Railroad Terminal near CP State Docks – Drone Image 3/10/22 @ 13:12 Central	Public
PORT – 3	03/30/22	Northward View of South End of Choctaw Yard – Drone Image 3/16/22 @ 10:46 Central	Public
PORT – 4	03/30/22	Northward View of Interchange Yard, Sibert Yard, and Riverfront Yard – Drone Image 3/16/22 @ 11:42 Central	Public
PORT – 5	03/30/22	Southward View of McDuffie Coal Tracks and ICTF Lead – Drone Image 3/21/22 @ 16:53 Central	Public
PORT – 6	03/30/22	Southward View of ICTF and ICTF Lead – Drone Image 3/21/22 @ 17:41 Central	Public
PORT – 7	03/30/22	Southeastward View of ICTF Lead and McDuffie Coal Terminal – Drone Image 3/21/22 @ 17:41 Central	Public
PORT – 8	03/30/22	Northeastward View of ICTF Lead and Mobile Container Terminal – Drone Image 3/21/22 @ 17:41 Central	Public
PORT –9	03/30/22	Updated ASPA- Railroad Traffic Volume Forecast	Public



RAIL CARRIERS

- ++++ BNSF*
- ++++ AGR via BNSF
- ++++ CN*
- ++++ Alabama Export Railroad via CN
- ++++ Kansas City Southern* via CN
- ++++ CSX*
- ++++ Norfolk Southern*
- ++++ CG Railway via the TASD
- ++++ TASD
- ++++ Private Industry Track

*Class I Railroad
ALE and KCS have access to the Port of Mobile via CN tracks

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COMMODITY	TERMINAL	LOCATION	CURRENT TERMINAL ANNUAL THROUGHPUT FY21	TERMINAL ANNUAL THROUGHPUT CAPACITY	TERMINAL ANNUAL THROUGHPUT CAPACITY AT FULL BUILDOUT	1-2 NEW VOLUME GROWTH	1-2 FY-YEAR OVER YEAR NEW RAIL CAR INCREASE	3-5 FY-YEAR NEW VOLUME GROWTH	3-5 FY-YEAR NEW RAIL CAR INCREASE	NOTES
COAL	MCDUFFIE COAL TERMINAL	LOWER HARBOR	11,634,727 SHORT TONS	16,000,000 SHORT TONS	22,000,000 SHORT TONS	7,500,000 SHORT TONS	22,727 RAIL CARS	5,000,000 SHORT TONS	21,551 RAIL CARS	Alabama coal mine owners have initiated new investments, reopened mines, and expanded production to meet global demands for metallurgical grade coal on deposit in the state. Additional export business from Illinois Basin and western coal producers are shifting supply chains into McDuffie. 2021 and 2022 global markets show ongoing mine challenges in Australia. Western Allies' sanctions on Russian coal are driving gains in U.S. thermal and metallurgical coal orders. In 2021, three mine companies reopened idle mines to meet market demand and ASPA secured commitments to handle exports from a new customer outside of Alabama. These recent shifts in global supply chains and available capacity are the basis for revised volumes. ASPA shippers have projected near term annual export volumes will reach 20 million short tons. ASPA is implementing \$45 million in its enhancement and modernization program through 2029 at McDuffie Terminal to support planned export volume increases from its customers. This program delivers 20-22 million tons in export annual throughput capacity alone. CSX, CN, and Norfolk Southern deliver coal into McDuffie Terminal via TASD.
CONTAINERS	INTERMODAL CONTAINER TRANSFER FACILITY	LOWER HARBOR	21,445 TEU	250,000 TEU	500,000 TEU	35,975 TEU INCREASE	8,993 ADDITIONAL RAIL WELL CAR GROWTH	57,749 TEU INCREASE	14,437 ADDITIONAL RAIL WELL CAR GROWTH	This is a new container rail intermodal facility served by CN via TASD. Service out of the ICTF is double stack. ASPA growth assumption is based on year-over-year performance. ASPA 2022 year to date growth over the same time period in 2021 posted 139% growth, rather than 30% growth anticipated. Currently, CN and ASPA are negotiating new capacity allocations in Mobile ICTF to accommodate carrier-identified growth projections. In 2022, ASPA and CSX announced a new, fully-funded inland intermodal container transfer facility to connect Central Alabama's advanced manufacturing and retail distribution shippers with Mobile ICTF. https://www.alports.com/wp-content/uploads/2022/01/MontgomeryICTF_PortofMobile_AlabamaPortAuthority_01282022.pdf . Construction is expected to begin this year. Additionally, the State of Alabama and Norfolk Southern have announced Alabama-USA corridor that will add freight and intermodal rail capacity and connect NSR's McCalla Intermodal Facility to Mobile ICTF. NSR is self-funding some portions of the improvements and their construction has already begun. https://governor.alabama.gov/newsroom/2022/01/governor-ivey-announces-launch-of-alabama-usa-corridor/ and https://www.a-usacorridorproject.com/ . These two projects will add to the fast growth volumes into and out of Mobile intermodal rail gateway. TEU capacity numbers are predicated on rail carriers' ability to align their schedules to availability of working track at ICTF.
MIXED RAIL FREIGHT	CG RAIL FERRY TERMINAL	UPPER HARBOR MAIN DOCKS COMPLEX	7,047 RAIL CARS	22,386 RAIL CARS	26,936 RAIL CARS		26,936 RAIL CARS		26,936 RAIL CARS	CG Railway LLC, Genessee & Wyoming joint venture with Seacor, took delivery of two new rail car ferry ships that provide 4-day service between Mobile and Mexico. See: https://media.gwrr.com/press-releases/news-details/2021/CG-Railway-Celebrates-Completion-of-New-Rail-Ferrys-Maiden-Voyage-Takes-Delivery-of-Second-Rail-Ferry/default.aspx . These vessels expanded carriage capability by 4,550 rail cars. Assuming a third vessel is not built to expand services, CG Railway's 1- to 5-year annual volume handled is 26,936 rail cars. The low base year volume of 7,047 was due to vessel failures and shipyard dwells. The first new vessel, CHEROKEE, is running at capacity. The second ship, MAYAN, will be in service by 2022. CG Railway LLC serves forest products, chemical, metals, and agribusiness shippers from the Midwest and Southeast US markets. CG Railway, through TASD, also takes cars from five Class I railroads serving the Port.
AUTOMOBILES / ROLLING STOCK	AUTOMOBILE INTERNATIONA L TERMINAL	UPPER HARBOR MAIN DOCKS COMPLEX	0	150,000 UNITS	150,000 UNITS	AT CAPACITY	18 UNITS PER CAR - 2,500 RAIL CARS	AT CAPACITY	18 UNITS PER CAR - 4,166 RAIL CARS	AutoMobile Terminal International, a partnership of Terminal Zarante, Neltume Ports and ATCO, is an experienced finished automobile logistics terminal operator serving global automotive OEMs in Latin America. AIT and ASPA completed a \$61 million RO/RO terminal at Mobile in Q3 2021. The industry's global OEM shipping contracts come up for renewal in Q4 2021 and Q1 2022. AIT is confident this terminal will begin moving cars at or near capacity. AIT advises 30% of volume handled in years 1 to 3 will be rail served, and 50% in years 4 and 5. This terminal would support 5 Class I railroads via TASD.

ALABAMA STATE PORT AUTHORITY/
TERMINAL RAILWAY ALABAMA STATE DOCKS

EXHIBIT 9