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Cynthia T. Brown
Chief of the Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423

Re: Gulf Coast Passenger Service Between New Orleans and Mobile
STB Finance Docket No. 36496

Dear Ms. Brown:

Brewster Management Associates is a logistics consulting company located in Barnstable County, Massachusetts that works closely with numerous companies that rely on the freight rail service provided by CSX Transportation, Inc. I write to express concerns regarding the impact on that freight rail service of Amtrak's proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama.

Many of our client companies produce and distribute lumber and plywood commodities to the construction industry that is a critical component of our economy. They rely on CSXT, and other freight rail carriers, to transport raw materials to various consuming markets in a timely and consistent fashion as a vital part of the nation's supply chain. Reliable and price competitive freight rail service is critical to the success of their businesses and CSXT provides access to two major port terminals in New Orleans and Mobile. These ports provide greater access to domestic and international markets than would otherwise be available. The quality of service CSXT provides makes freight rail the most efficient transportation alternative to maintain and grow business levels.

CSXT and Norfolk Southern Railway Company have submitted evidence, including a Rail Traffic Controller study, that shows the introduction of Gulf Coast passenger service between New Orleans and Mobile will cause significant harm to

freight service. This harm will manifest itself through decreased freight train speeds and delay as well as extreme operational variability. CSXT's local trains, the very trains that directly serve these port facilities, will be hit the hardest. Brewster Management Associates is deeply concerned about our our clients' ability to meet the demands of their customers and remain profitable if this harm to CSXT's freight rail service materializes.

Brewster Management Associates does not oppose Gulf Coast passenger service and expresses no opinion on the merits of that service. However, it is important that the introduction of this passenger service does not decrease the quality of freight service provided by CSXT. It is our understanding that CSXT and NSR have proposed infrastructure projects that would support Amtrak's desired passenger service while protecting the quality of freight service that many industries rely upon. We urge the Board to seriously consider the merits of these projects.

It is unfair, and potentially illegal, for Amtrak to insist on operating passenger service on privately owned track without regard to the cost impact on the owners of that track and the impact on the businesses with whom it will share the corridor. If Amtrak is permitted to commence passenger service without paying its own way, the cost of that service will inevitably fall on the shoulders of shippers who will either be forced to turn to more expensive and less efficient alternatives to rail or will wind up subsidizing passenger service through increased rail service costs as CSXT and NSR are pressed to add infrastructure at their own expense to subsidize a passenger rail system in order to prevent the degradation to freight service.

The Board has an obligation to protect the interests of all parties that rely on the national rail network, not just those of passenger rail. Amtrak's desire for access to the Gulf Coast Corridor with no strings attached is not only harmful to freight rail service, but untenable given the substantial funding it received from Congress last year. Brewster Management Associates requests that the Board require Amtrak to fund and facilitate the construction of infrastructure projects so as to avoid any harm to freight rail service.

Respectfully submitted



Joseph M. Potts
President
Brewster Management Associates

cc: Parties of Record