

BEFORE THE SURFACE TRANSPORTATION BOARD
STB DOCKET NO. FD 36907
RAPID CITY, PIERRE & EASTERN RAILROAD, INC. — ACQUISITION AND
OPERATION EXEMPTION — STATE OF SOUTH DAKOTA
LETTER OF SUPPORT ON BEHALF OF SMART-TD

311808

ENTERED
Office of Chief Counsel
July 23, 2026
Part of
Public Record
July 23, 2026

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: STB Docket No. FD 36907 — SMART TD Support for Petition for Exemption

Dear Chief of Case Administration:

The International Association of Sheet Metal, Air, Rail and Transportation Workers – Transportation Division (SMART-TD) represents the train and engine service employees working on the Rapid City, Pierre & Eastern Railroad, Inc. (RCP&E), including those operating over the Huron-Yale Line (extending between milepost 160.33 at Huron, SD, and milepost 145.0 at Yale, SD).

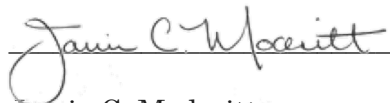
SMART-TD has reviewed RCP&E's Petition for Exemption filed under 49 U.S.C. § 10502 and 49 C.F.R. § 1121 to acquire the Huron-Yale Line from the State of South Dakota. We write to express our support for the granting of RCP&E's petition and offer the following observations:

1. **No Operational or Position Disruption:** SMART-TD members currently perform all operations, dispatching, and maintenance-related train services on the line under our existing collective bargaining agreement. As confirmed in the petition, converting RCP&E's leasehold interest into full ownership will result in no operational changes or job reductions.
2. **Waiver of 60-Day Labor Notice:** Because no SMART-TD represented employees will be adversely affected, displaced, or subjected to changes in employment terms as a result of this purchase, SMART-TD does not object to RCP&E's request for a waiver of the 60-day labor notice requirement under 49 C.F.R. § 1121.4(h).

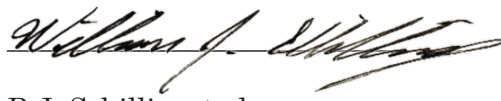
3. **Preservation of Labor Protections:** SMART-TD notes and relies upon RCP&E's commitment to adhere to applicable statutory employee protections pursuant to 49 U.S.C. § 10902(d).

Given that this transaction provides long-term operational certainty for the rail line while preserving our members' jobs and collective bargaining rights, SMART-TD respectfully requests that the Surface Transportation Board grant RCP&E's Petition for Exemption on an expedited basis as requested.

Respectfully submitted,



Jamie C. Modesitt
Vice President, SMART TD



B.J. Schillingstad
General Chairperson (RCP&E), SMART TD

cc Parties of Record