

November 17, 2021

Kali Bracey
Tel +1 202 639 6867
KBracey@jenner.com

VIA EMAIL

Williams A. Mullins
Crystal M. Zorbaugh
BAKER & MILLER PLLC

WMullins@bakerandmiller.com
CZorbaugh@bakerandmiller.com

Re: Deficiencies in NS's Opening Evidence

Dear Counsel:

I write about several deficiencies in the production of your opening evidence. First, the Norfolk Southern Railway's (NS) workpapers produced do not contain all of the output files created by the Rail Traffic Controller (RTC) model. It is the RTC output files that list each train's speed, run time and dwell time and form the basis of NS's argument that adding Amtrak trains to the New Orleans to Mobile corridor will lead to a deterioration in freight traffic service along the route. Without the original output files for each case, Amtrak cannot test NS's methodology. Second, there are several missing input files that, for example, do not allow Amtrak to determine how future train growth is calculated. Third, please provide the RTC files listed below. Finally, there are several files that indicate error messages when opened. Please provide corrected versions of those files.

Please see the list of deficiencies below. We ask that NS correct them by Friday, November 19, 2021.

Sincerely,

/s/ Kali Bracey

Kali Bracey

NS RTC Inputs

1. Please provide decoders for the data fields contained in e-workpaper “Gulf Coast Simulation NS Bridge Openings.xlsx,” tab “Sheet1.”
2. Please provide the data supporting the calculations of Average Loads, Empties, Tonnage and Length in tab “NS Locals” of e-workpaper “Gulf Coast Simulation NS Train Data.xlsx.”
3. Please provide the data supporting the calculations of the Average and Minimum Average Train Consist statistics shown in tab “Interchange (CNIC to NS)” of e-workpaper “Gulf Coast Simulation NS Train Data.xlsx.”
4. Please provide the data supporting the calculations of the Average and Minimum Average Train Consist statistics shown in tab “Interchange (CNIC to CSX)” of e-workpaper “Gulf Coast Simulation NS Train Data.xlsx.”
5. Please explain why the tab “Interchange (CNIC to CSX)” in e-workpaper “Gulf Coast Simulation NS Train Data.xlsx” contains two (2) different “Average Train Consist” calculations.
6. Please provide the data supporting the calculations of the Average and Minimum Average Train Consist statistics shown in tab “Interchange (CSX to CNIC)” of e-workpaper “Gulf Coast Simulation NS Train Data.xlsx.”
7. Please explain why the tab “Interchange (CSX to CNIC)” in e-workpaper “Gulf Coast Simulation NS Train Data.xlsx” contains two (2) different “Average Train Consist” calculations.

HNTB RTC Inputs

8. Please provide the source and the calculations of the data shown in tab “2039” of e-workpaper “Moveable Bridge Analysis.xlsx.”

RTC Files

9. Please provide the following RTC files used in or produced from each case included in NS’ workpapers:
 - a. .ARRIVAL
 - b. .CONFLICT
 - c. .DELAY
 - d. .DWELL

- e. .EQUIPMENT
- f. .HOLD
- g. .LOCATION
- h. .REPORT
- i. .ROUTE
- j. .SUMMARY