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

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Office of Proceedings
February 7, 2022
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Public Record

February 02, 2022

Dear Ms. Brown,

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

Javelin Global Commodities (UK) Ltd, located at 7 Howick Place, London, SW1P 1BB (hereinafter, “**Javelin**”) operates in the physical commodity sector and is actively involved in the transportation of bulk commodities both domestically and for export outside the U.S. As an integral part of our operations, Javelin relies on the freight rail service provided by CSX Transportation, Inc. (hereinafter, “**CSXT**”). In my capacity as its Chief Executive Officer, I am writing to you on behalf of Javelin to share my concerns with respect to the impact on that freight rail service of Amtrak’s proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama (hereinafter, the “**Passenger Service**”).

Javelin relies on CSXT to transport raw materials to various facilities and finished products to our customers. Freight rail services are critical to our business and CSXT provides access to two major port terminals in New Orleans and Mobile through which we can access greater domestic and international markets than would otherwise be available. The quality of service CSXT provides makes freight rail the most efficient transportation alternative to develop our business.

CSXT and Norfolk Southern Railway Company (hereinafter, “**NSRC**”) have submitted evidence, including a Rail Traffic Controller study, that illustrates the introduction of the Passenger Service will cause significant harm to freight services through decreased freight train speeds and delays as well as operational variability. CSXT’s local trains, which directly serve facilities essential to our business, will experience a significant adverse impact. As a result, Javelin is concerned about its ability to meet the demands of our customers and remain profitable if the impact upon CSXT’s freight rail services should materialize.

I wish to emphasize that Javelin does not oppose the Passenger Service and expresses no opinion on its merits. We do, however, believe that it is important that the introduction of the Passenger Service does not decrease the quality of



freight services provided by CSXT. We understand that CSXT and NSRC have proposed certain infrastructure projects that would support Amtrak's desired Passenger Service while protecting the quality of freight services that Javelin relies upon and we urge the Board to give due consideration to the merits of these projects.

In our opinion, it would be inequitable for Amtrak to insist on operating the Passenger Service without regard to the businesses with which it will share the corridor. Furthermore, if Amtrak should commence the Passenger Service without paying its own way, the cost burden of the Passenger Service will inevitably fall on shippers, such as Javelin, who will either be forced to turn to more expensive and less efficient alternatives to rail transportation or be in the unenviable position of subsidizing passenger services through increased rail service costs as CSXT and NSRC are pressed to add infrastructure to stem the degradation to freight services.

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 services, but untenable given the substantial funding it received from Congress last year.

Accordingly, Javelin requests that the Board gives due consideration to the contents of this letter and require Amtrak to fund and facilitate the construction of infrastructure projects with a view to mitigating the harm to freight rail services.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Peter Bradley", is written over a light blue horizontal line.

Peter Bradley
Chief Executive Officer
Javelin Global Commodities (UK) Ltd

cc: FD 36496 Service List