

The New York, Susquehanna and Western Railway Corporation

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February 7, 2022

By E-Filing

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

ENTERED
Office of Proceedings
February 8, 2022
Part of
Public Record

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

Dear Ms. Brown:

The New York, Susquehanna and Western Railway Corporation (“NYS&W”) is a 400+ mile Class III railroad with operations in New York, Pennsylvania and New Jersey. NYS&W relies on its interchanges with both CSX Transportation, Inc. (“CSXT”) and Norfolk Southern Corporation (“NSR”) to provide efficient and competitive freight rail services to its customers. I write on behalf of NYS&W to express concerns regarding the potential precedent setting impact on our nation’s efficient freight rail network if Amtrak’s proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama is allowed to proceed without evaluating impacts on connecting short lines’ ability to efficiently compete and serve its customers.

As noted above, NYS&W is a short line operator in three states that relies on its Class 1 railroads (CSXT and NSR), to connect to the national freight network. Consistent, reliable, and cost-effective Class 1 rail service is critical to the success of our business and our customers. The quality of service the Class 1’s provide makes or breaks NYS&W’s ability to maintain and grow our business. Introducing services that limit freight capacity without regard to understanding the impacts on freight rail efficiency and the ability to meet the demands of our customers is a significant concern.

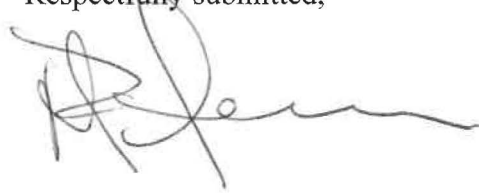
CSXT and Norfolk Southern Railway Company have submitted evidence, including a Rail Traffic Controller study, that shows the introduction of Gulf Coast passenger service between New Orleans and Mobile will cause significant harm to freight service. This harm will manifest itself through decreased freight train speeds, higher dwell times and extreme

operational variability. Although our short line does not operate in this region, those inefficiencies will negatively impact freight traffic that NYS&W participates in.

NYS&W does not oppose passenger service and expresses no opinion on the merits of Amtrak's proposed Gulf Coast service. However, it is important that the introduction of this passenger service does not decrease the quality of freight service provided by our Class 1 connections. 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 NYS&W relies on. NYS&W urges the Board to seriously consider the merits of these projects.

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. NYS&W requests that the Board require Amtrak to fund and facilitate the construction of the infrastructure projects CSX and NSR have identified to ensure there is no harm to freight rail service.

Respectfully submitted,

A handwritten signature in dark ink, appearing to be a stylized name, possibly "H. Allen", written in a cursive script.

cc: FD 36496 Service List