

February 9, 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

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

Dear Ms. Brown:

Plastic Express is headquartered in City of Industry, CA with operating facilities around the country, supporting our customers supply chain through the ports, rail, and truck. Not only does our company rely on the freight rail service provided by CSX Transportation, Inc., but the business we do with our customers relies on the freight rail service provided by CSX Transportation. I write on behalf of Plastic Express 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.

Plastic Express is a warehouse and packaging company and relies on CSXT to transport our customer's materials to our facilities, including product moving from the Gulf Coast to Savannah, as well as shipments originating in the East and moving to our Gulf Coast facility. Freight rail service is critical to the success of our business and as our company reviews expanding our footprint directly in New Orleans and/or Mobile, any impact to freight rail transit makes this expansion less attractive. The quality of service CSXT provides makes freight rail the most efficient transportation alternative to maintain and grow our business.

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.

Plastic Express 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 Plastic Express relies on. Plastic Express urges the Board to seriously consider the merits of these projects.

It is unfair for Amtrak to insist on operating passenger service without regard to the businesses it will share the corridor with. 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. Customers of Plastic Express 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 to stem 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 \$66 billion in funding it received from Congress last year. Plastic Express 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,

/Eric B. Cunningham/

Eric B. Cunningham
Plastic Express

cc: FD 36496 Service List