



Lake State Railway Company

John A. Rickoff

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

RE: Amtrak Proposed Gulf Coast Passenger Service

Dear Ms. Brown,

I am writing on behalf of Lake State Railway Company (LSRC), a regional railroad located in Michigan which provides rail service to a number of significant rail shippers who rely on consistent and timely service by LSRC. While our operation is located entirely in the State of Michigan, it is important to understand that our customers are shipping and/or receiving products from all over North America and in some cases importing and/or exporting internationally. Our connection to CSX Transportation, Inc. (CSXT) is a vital part of this service and I want to express my concern regarding the potential precedent setting impact on our nation's efficient and world-leading freight rail network with the Amtrak proposed Gulf Coast passenger service between New Orleans, Louisiana and Mobile, Alabama. If this proposal is allowed to proceed, it will no doubt cause devastating impacts on connecting short line and/or regional railroads' ability to efficiently compete and serve their customers.

Consistent, reliable, and cost-efficient rail service is critical to the success of our business, our customers and our main Class I railroad connection with CSXT. The quality of service CSXT provides in conjunction with LSRC's service is critical to the success of our customers across the country. High quality rail service is the most efficient transportation alternative businesses need and depend on. The introduction of passenger services that will negatively impact freight rail capacity and efficiency and adversely affect the needs of customers is highly concerning.

It is my understanding that CSXT and Norfolk Southern Railway Company (NS) 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. It is likely the freight train service will be impacted by reduced freight train speeds, longer delivery times, and extreme operating variability. Our railroad does not operate in this region, however rail traffic that we move with CSXT does and will directly impact our customers here in Michigan. LSRC's concern over the precedent of proceeding without proper due diligence is justified.

LSRC does not oppose passenger rail service and expresses no opinion on the merits of the proposed service. It is important to note that it is unfair of Amtrak to insist on operating passenger service without regard to the negative impacts to CSXT, NS and most importantly to their

customers directly and indirectly affected on the rail line in question. The trickle-down-effect of interrupted freight service is far reaching and will undoubtedly impact our customers here in Michigan.

Every carload of traffic that LSRC handles is critical to our long-term success and our success is critical to our customers. Increased costs due to interruptions and unreliable rail service could cause a devastating impact to the businesses we serve which could result in a reduction of workforce or even worse, the closing of a facility. Most of the customers we serve are in rural areas and they are vital not just to our success, but to the viability of the surrounding communities.

The Board has an obligation to protect the interest of all parties that rely on the national railroad network, both freight and passenger. A “no-strings-attached” Amtrak proposal is harmful to freight rail service. LSRC requests that the Board require Amtrak to fund and facilitate infrastructure projects that will avoid any harm to freight rail service, customers and providers.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Rickoff". The signature is fluid and stylized, with the first name "John" being the most prominent.

John A. Rickoff
President & CEO
Lake State Railway Company
989-393-9801

cc: FD 36496 Service List