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ENTERED Office of Proceedings April 5, 2021 Part of Public Record

April 5, 2021

Ms. Allison Davis Director, Office of Proceedings Surface Transportation Board 395 E Street SW Washington, DC 20423

Re: Surface Transportation Board Docket FD_36496 ID 301767 - National Railroad Passenger Corp Under 49 U.S.C. Section 24308(e) - CSX Transportation, Inc., and Norfolk Southern Corporation.

Dear Ms. Davis:

The mission of the Alabama Mining Association (AMA) is to promote the safe and sustainable mining of the natural resources that strengthen our infrastructure and grow our economy. We are writing to urge the Surface Transportation Board to deny Amtrak an Order to restore passenger service between Mobile, Alabama and New Orleans, Louisiana, and compel Amtrak to complete its Rail Traffic Control Study with supplemental engineering and cost report.

Our state's largest metallurgical (met) coal producer relies on the CSX railroad to carry high-quality met coal to the public terminals at the Port of Mobile, specifically, the McDuffie Coal Terminal. The export of met coal, the type of coal required to make primary steel, generates half of the revenue for the Alabama State Port Authority. It also supports thousands of very high-paying Alabama jobs. Unobstructed rail access to the port is critical for the met coal industry and met coal exports are critical to the operating revenue that supports Alabama's only seaport.

Our industry has deep reservations over Amtrak initiating new passenger rail service at Mobile without the proper study or investment to ensure freight and container intermodal rail service is not degraded, and to ensure there is sufficient capacity for continued freight growth. Moreover, our industry is concerned about resulting congestion or delay impacts to supply chains and transportation rates should passenger rail enter the corridor without proper assessment. In response to those concerns, our industry understood Amtrak initiated a freight modeling study and a supplemental engineering and cost assessment in early 2020. As the study was nearing completion in late January 2021, we learned that Amtrak cancelled the study. We also understood that the host railroads, the Alabama State Port Authority, the Alabama delegation to the Southern Rail Commission, and our elected officials asked Amtrak to complete the study work to support informed decisions regarding the utilization of the CSX Gulf Coast rail corridor.

Now, we are deeply troubled that Amtrak seeks an injunction from the Surface Transportation Board to bypass this important step in assessing operational service and capacity in this important freight corridor.

AlabamaMining.org

AMA respectfully asks the Board require Amtrak to complete their modeling study and supplemental rail infrastructure and cost assessments to identify the improvements necessary to efficiently and cost competitively support both freight rail and passenger services at Mobile, Alabama.

Sincerely,

Patrick V. Cayle

Patrick V. Cagle President, Alabama Mining Association

C: Parties of Record