



January 13, 2015

Cynthia T. Brown
Chief of the Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

237453
ENTERED
Office of Proceedings
January 13, 2015
Part of
Public Record

**PRESERVING
RAIL FREIGHT
SERVICE**

serving the counties of

Centre
Clinton
Columbia
Lycoming
Mifflin
Montour
Northumberland
Union

**SEDA-COG JOINT
RAIL AUTHORITY**

201 Furnace Rd
Lewisburg
PA 17837

(570) 524-4491
fax 524-9190

jra@seda-cog.org
<http://jra.seda-cog.org>

**RE: *Norfolk Southern Railway Company – Acquisition and
Operation – Certain Rail Lines of the Delaware and Hudson
Railway Company, Inc., STB Docket No. FD 35873***

Dear Ms. Brown:

The SEDA-COG Joint Rail Authority (JRA) wishes through this letter filing to express its support for Norfolk Southern Railway Company's (NS) proposed acquisition of certain lines of the Delaware and Hudson Railway Company, Inc. (D&H). As information, the JRA Board of Directors previously authorized support the proposed line sale transaction, subject to certain conditions (tied to reserving the interests of JRA and the shippers located upon the lines that the JRA owns) which since have been satisfied through constructive dialogue among JRA, NS, and D&H.

As part of this proposed line sale transaction, NS has offered to preserve D&H's commercial access to customers located on JRA-owned lines by way of NS-supplied haulage service between Saratoga Springs, New York, and Northumberland, Pennsylvania. The terms of the proposed haulage agreement (the so-called Direct Short Line Access Agreement) are a matter of record in this proceeding. The haulage proposal, combined with post-transaction service changes that NS contemplates, should result in greater operating efficiency for traffic flowing between points on JRA-owned lines and certain points on the D&H and its rail carrier corporate affiliates, and it should yield operating efficiencies for traffic flowing between points on the JRA-owned lines and points on NS and connecting third-party railroads.

The JRA understands that there remain operational details that will need to be addressed should the Board approve the pending application, but the JRA is fully confident that NS and our short line operator will be able to resolve such operating issues amicably. The JRA values NS as its primary Class I railroad partner, and we appreciate the efforts that NS has undertaken to ensure that the rail customers on JRA-owned lines will continue to enjoy economic access to D&H (and, by extension, the entire Canadian Pacific Railway system) in addition to NS.

Sincerely,

Jeffery K. Stover, Executive Director
SEDA-COG Joint Rail Authority

cc: All parties of record
Mr. John Friedman, Norfolk Southern



Affiliated with
SEDA Council of Governments