



# Thoroughbred Direct Intermodal Services, Inc.

5165 Campus Dr., Suite 400 | Plymouth Meeting, PA 19462 | Tele: (877) 250-2902 | Fax: (610) 567-3390

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Cynthia T. Brown, Chief  
Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street, SW  
Washington DC 20423-0001

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:

I am writing on behalf of Thoroughbred Direct Intermodal Services (“TDIS”) to express our strong support of the application filed on November 17, 2014 by Norfolk Southern Railway Company (“NS”) to acquire and operate certain rail lines of the Delaware and Hudson Railway Company, Inc. (“D&H”).

TDIS supports the proposed acquisition because NS is a highly regarded Class I carrier with a history of strong reinvestment practices, which should ensure the continued viability of the D&H South Lines. Currently, NS is the primary user of the D&H South Lines with daily operations over these lines, so the proposed acquisition should result in minimal disruption of service. By aligning ownership with usage and by significantly improving NS’s connection to its Pan Am Southern facilities, the proposed acquisition also creates operating efficiencies that should improve the reliability and sustainability of service. In addition, the proposed acquisition enhances overall competition in the Northeast surface transportation market as it enables NS and D&H to more effectively compete with rail and non-rail transportation modes by strengthening their respective rail systems in the region. As there are no competitive harms that would arise from this acquisition, our company fully supports this proposal.

For the above reasons, we strongly support the application of NS before the STB to acquire and operate certain rail lines of D&H. We respectfully request your expedited review and approval of this minor transaction.

Sincerely,

Sam Ninness  
AVP & General Manager  
Thoroughbred Direct Intermodal Services



cc: All parties of record on Service List – Docket No. FD 35873

Mr. Jeffrey A. Bartos  
Guerrieri, Clayman, Bartos & Parcelli, P.C.  
1900 M Street, N.W., Suite 700  
Washington, DC 20036

Mr. Scott P. Conti  
75 Hammond Street  
Worcester, MA 01610

Mr. Steven M. Golich  
Celtic International.  
7840 Graphics Drive, Suite 100  
Tinley Park, IL 60477

Mr. Peter R. Leishman  
Milford-Bennington Railroad Co., Inc.  
62 Elm Street  
Milford, NH 03055

Mr. Terrence D. Matthews  
JB Hunt Transport Services, Inc.  
130  
Lowell, AR 72745-0130

Mr. Wayne A. Michel  
Reading Blue Mountain And Northern Railroad Company  
P.O. BOX 218  
Port Clinton, PA 19549

Mr. William A. Mullins  
Baker & Miller Plc  
2401 Pennsylvania Ave, Nw-Suite 300  
Washington, DC 20037

Mr. Mike Radak  
Hanjin Shipping America, L.L.C.  
80 Route 4 East  
Paramus, NJ 07652-4600