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Agency of Transportation

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VIA E-FILING

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20024

Re: *New England Central Railroad, Inc. – Trackage Rights Terms and Conditions – Pan Am Southern LLC*
STB Docket No. FD 35842

Dear Ms. Brown:

On behalf of the State of Vermont, I write to address the issue of fair rates for Vermont shippers who rely on the freight services provided by Pan Am Southern LLC (PAS), using trackage rights over New England Central Railroad, Inc. (NECR).

Vermont has an interest in maintaining access to reasonably priced rail service for shippers in all areas of the state. VTrans is concerned that the rate being requested for use of NECR trackage by Pan Am Southern may exceed a reasonable standard. Over the past five years, the federal government and the State of Vermont jointly have invested more than \$60 million in the NECR as part of a \$90 million project to improve the NECR's tracks, crossings, signals and bridges. This investment has resulted in an almost complete reconstruction of the NECR in Vermont, which has substantially reduced the NECR's maintenance costs.

As the Board reviews this case, Vermont urges the Board to take into consideration the amount of federal/state investment in the NECR, which was intended to improve access to quality rail services for all users of the NECR's line, including both the NECR's own shippers and those shippers who are indirect users of the NECR through services provided by PAS under its trackage rights over the NECR. It would be a disservice to the public who financed in large part these rail improvements if the rates that are established are not reasonable and represent industry norms.

Sincerely,


Susan M. Minter
Secretary of Transportation



**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB DOCKET NO. FD 35842

**NEW ENGLAND CENTRAL RAILROAD, INC. –
TRACKAGE RIGHTS ORDER –
PAN AM SOUTHERN LLC**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing letter to the Board on behalf of the State of Vermont was served on this date by the method indicated below:

By email on:

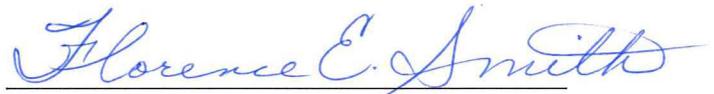
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Dated: August 28, 2015



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