

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Central Railroad Company,

Petitioner,

v.

Neoga Township, the City of Neoga and the State of Illinois,
Department of Transportation,

Respondents.

Petition of Illinois Central Railroad Company seeking an order of closure of the at-grade crossings of Cemetery Road/ TR-67 (DOT 289 160P; railroad milepost 185) and TR-85 (DOT 289 161W; railroad milepost 185.65) and the Illinois Central Railroad Company's tracks, and an order of installation of automatic flashers and gates at the crossing of TR-85A (DOT 289 162D; railroad milepost 186.16) and the Illinois Central Railroad Company's tracks, all in Neoga Township, Cumberland County, Illinois.

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Illinois Commerce Commission
RAIL SAFETY SECTION

T05-0007

**SUPPLEMENTAL RESPONSE TO RESPONDENT'S
FIRST SET OF INTERROGATORIES**

Now comes Illinois Central Railroad Company ("IC") with its Supplemental Response to the City of Neoga's First Set of Interrogatories and states as follows (the Requests are in italics and relate back to the original discovery):

INTERROGATORY #2: *Describe the benefits to the ICRR of closing each highway/rail grade crossing in the petition.*

Supplementing our original answer, closing any crossing removes a point of potential train-vehicle conflict. Grade crossing collisions not only result in tragedy for those in a vehicle, but also result in injuries for the crew, derailments, and other catastrophic results, especially when the train is carrying hazardous material or is a passenger train. These tragedies not only

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hurt the railroad, but the public at large. Closing a grade crossing where accidents such as these have the potential to happen, especially when an alternate route is made readily available, is not only good for the railroad, but good for Neoga and good public policy as well.

With regard to the crossings IC proposed to close, the average life of a crossing such as TR-67 and TR-85 is ten years. To replace those crossings with similar material would cost approximately \$42,696.00 each.

INTERROGATORY #4: *Describe the reason for building the additional line of track in the area of the two highway/rail grade crossings which are the subject of the petition instead of building the additional rail immediately north of Neoga where there is an area of track at least a mile and a half long without any highway/rail grade crossings.*

Train maintenance presents a cost to the railroad, especially on a main line of railroad where freight trains are traveling up to 60 miles per hour and passenger trains are traveling up to 79 miles per hour. Through the use of Centralized Traffic Control, or CTC, railroads can use a single main line with passing sidings to move trains in opposing directions on the same track. This allows railroads to avoid the cost and expense of having to maintain the second main track.

With regard to the issue of why the second main was removed north of Neoga versus south, IC will attempt to see if it has any current information on that issue. In general, the impact was to have two-mile passing sidings every twenty miles.

INTERROGATORY #9: *Describe the proposed routes to be used by farm machinery, grain trucks and business vehicles for the properties located in the area described as follows:*

(a) *Eastern boundary: Petitioner's tracks.*

- (b) *Western boundary: The western boundary of Section 13 in Township 10 North, Range 6 East (Big Spring Township) in Shelby County, Illinois, and as such line is extended to the east to Petitioner's tracks.*
- (c) *Northern boundary: The northern edge of Section 13, Township 10 North, Range 6 East (Big Spring Township) in Shelby County, Illinois, and as such line is extended to the east to Petitioner's tracks.*
- (d) *Southern boundary: The southern edge of Section 13, Township 10 North, Range 6 east (Big Spring Township) Shelby County, Illinois; and as that line is extended to the east to the Petitioner's tracks.*

(A diagram of the described area is enclosed for Petitioner's reference in responding to this question. This exhibit is attached for area reference only. The question directs an answer relating to current owners as that ownership may exist on the date of the answer to this interrogatory.)

Vehicles would Access 950N via the proposed access road located there. Vehicles would access 900 by traveling south on RTE 45 crossing the tracks at 850 and traveling north via the proposed access road.

INTERROGATORY #10: *Please present the fire and emergency vehicle service access plan for properties in the area described in the interrogatory immediately above.*

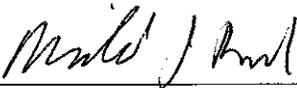
See answer to #9.

INTERROGATORY #20: *If a train is allowed to block Crossing 850 while it is "continuously moving", what is the maximum amount of time that a continuously moving train would block Crossing 850.*

It is not uncommon for IC to operate trains at approximately 10,000 feet in length. Some may be more, some less, but 10,000 feet is a good number for illustration purposes. On the main line, a train traveling at sixty miles per hour would clear the crossing at 850 in just under two minutes. On the passing siding, if a train was waiting in the siding, in many instances it would be sitting between Neoga and TR850, and not blocking it. If a train was proceeding into or out of the siding, its top speed on the passing siding is no greater than twenty-five miles per hour, and at TR850 it would be either slowing down to a stop or accelerating from a stop, so it would generally be in excess of five minutes as a minimum for a train of at least 10,000 feet in length.

Dated at Homewood, Illinois this 3rd day of August, 2005.

ILLINOIS CENTRAL RAILROAD COMPANY

By 
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VERIFICATION

State of Illinois)

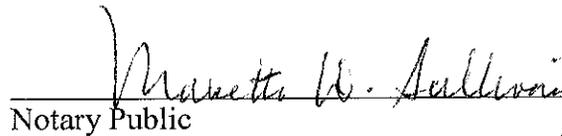
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County of Cook)

John Henriksen, being duly sworn, deposes and says that he is the Manager-Public Works for Illinois Central Railroad Company, that he has read the foregoing Supplemental Response to the City of Neoga's First Set of Interrogatories and knows the facts asserted therein, and that the same are true as stated.



Subscribed and Sworn to before me this 3rd day of August, 2005.


Notary Public

