

LEE D. MESCOLOTTO
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November 3, 2015

Hon. Angela T. Jones, ALJ
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
PO Box 3265
Harrisburg, PA 17105-3265

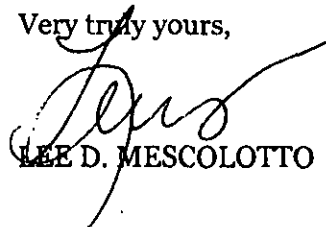
In RE: Joint Application of Norfolk Southern Railway Company and Montgomery County
for approval to abolish the rail-highway crossing (DOT #589 334 M) where Old
Reading Pike cross above the tracks of Norfolk Southern Railway Company in West
Pottsgrove Township, Montgomery County, Pennsylvania
In RE: A-2012-2321059

Dear Judge Jones,

Please be advised of my representation of West Pottsgrove Township, with respect to the
above-captioned matter.

I am enclosing a Pre-Hearing Conference Memorandum for your consideration.

Very truly yours,



LEE D. MESCOLOTTO

LDM/al
Enclosure
c: As per Certificate of Service

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BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION

Joint Application of Norfolk Southern Railway :
Company and Montgomery County; :
For approval to abolish the rail-highway : Docket No. A-2012-2321059
Crossing (DOT #589 334 M) where Old Reading :
Pike crosses above the tracks of Norfolk :
Southern Railway Company in West Pottsgrove :
Township, Montgomery County, Pennsylvania :

Pre-Hearing Conference Memorandum

West Pottsgrove Township, by and through its attorney, Lee D. Mescolotto, Esquire, files its
Pre-Hearing Conference Memorandum:

1. The above-captioned matter relates to the request for approval of the demolition of a rail-highway crossing (DOT #539 334 M), where Old Reading Pike crosses the tracks of Norfolk Southern Railway Company in West Pottsgrove Township, Montgomery County. The maintenance of the bridge and the complete substructure and superstructure was the responsibility of Norfolk Southern, in accordance with prior PUC Orders of December 21, 1989. As part of this Order, Montgomery County was to take care of the deck and wearing surface.
2. West Pottsgrove Township has no responsibility for the road nor the bridge, under prior PUC Orders, and is simply the Township in which the bridge is located.
3. West Pottsgrove Township seeks permission to be removed from the matter, as it has no interest in these proceedings.
4. In the alternative, in the event West Pottsgrove Township is kept in the proceedings, the Township supports the recommendation of the Pennsylvania Public Utility Commission, Bureau of Technical Utility Services, Transportation Division – Real Safety Section, which requests that the bridge abutments be removed as part of the demolition procedure.

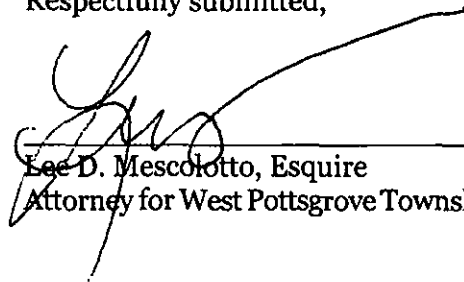
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SECRETARY'S BUREAU

Respectfully submitted,

By:



Lee D. Mescolotto, Esquire
Attorney for West Pottsgrove Township

CERTIFICATE OF SERVICE

I hereby certify that I am, this 4th day of November, 2015, serving the foregoing documents in accordance with the requirements of 52 PaCode §1.54, et seq (relating to service by a participant):

Nicholas D. Mertens, Ass't Counsel
Governor's Office of General Counsel
Pennsylvania Dep't of Transportation
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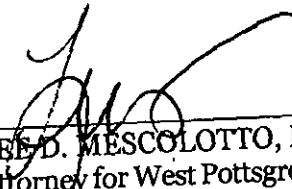
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Dated: November 4, 2015

By:



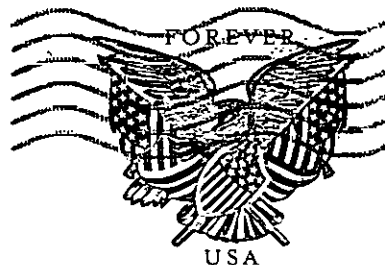
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Pottstown, Pennsylvania 19464-0792

Return Service Requested

LEHIGH VALLEY PA 180

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Rosemary Chiavatta, Secretary
Pennsylvania Public Utility Commission
P)O Box 3265
Harrisburg, PA 17105-3265

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