



Benjamin C. Dunlap, Jr., Esquire [bdunlapjr@nssh.com](mailto:bdunlapjr@nssh.com) (717) 236-3010, Ext. 121

July 11, 2023

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

**Re: Application of the Department of Transportation of the Commonwealth of Pennsylvania for approval to replace the public above-grade crossing by the construction of new bridge where State Route 0011 (West King Street) crosses over the single track of Norfolk Southern Railroad (DOT No. 592 122 M) in Shippensburg Borough, Franklin County, and the allocation of cost incident thereto  
Docket No. A-2022-3031613**

Dear Secretary Chiavetta:

I write this letter on behalf of our client Norfolk Southern Railway Company (“Norfolk Southern”) to formally object to the signed Drawing Authorizing the Acquisition of Right-of-Way for State Route 11, Section 095R/W, consisting of sheets 1 through 23, Final Signed Right-of-Way Plans and Property Description Tract, filed by the Pennsylvania Department of Transportation (“PennDOT”), for the approval of the Commission, on March 21, 2023, in the above-captioned proceeding.

Norfolk Southern objects to the real estate acquisition due to the information concerning Norfolk Southern’s property ownership on the plans being incorrect. Norfolk Southern is working with PennDOT to correct the errors, but objects to the plans being approved until that is accomplished.

Sincerely yours,

A handwritten signature in blue ink that reads 'Benjamin C. Dunlap, Jr.' in a cursive script.

Benjamin C. Dunlap, Jr.

BCDjr/ino

cc: All Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of the Department of Transportation :  
of the Commonwealth of Pennsylvania for : Docket No.: A-2022-3031613  
approval to replace the public above-grade :  
grossing by the construction of new bridge where :  
State Route 0011 (West King Street) crosses over :  
the single track of Norfolk Southern Railroad :  
(DOT No. 592 122 M) in Shippensburg Borough, :  
Franklin County, and the allocation of cost : ELECTRONICALLY FILED  
incident thereto :**

**CERTIFICATE OF SERVICE**

I hereby certify that I served one (1) copy of the attached Letter of Objection in the above-referenced matter, this day, upon the parties listed below via electronic mail as indicated below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

David Keller, Chairman  
Franklin County Commissioners  
272 North Second Street  
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[commissioners@franklincountypa.gov](mailto:commissioners@franklincountypa.gov)

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Shippensburg Borough  
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Samuel Cressler, Chairman  
Southampton Township  
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Date: July 11, 2023

/s/Ijeoma N. Okereke  
Ijeoma N. Okereke