



COMMONWEALTH OF PENNSYLVANIA  
GOVERNOR'S OFFICE OF GENERAL COUNSEL

January 29, 2026

**Via Electronic Filing**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street 2nd FL  
Harrisburg, PA 17120

**RE: Complaint filed by Reading Blue Mountain & Northern Railroad Company involving the deteriorated condition of the railroad crossing surface and roadway approaches at the public crossing (DOT 361 425 J) where SR 2019 (Oak Street) crosses, at grade, the tracks of Reading Blue Mountain & Northern Railroad Company, located in the Pittston Township, Luzerne County.  
Docket No. C-2020-3016906**

Dear Secretary Homsher,

Enclosed for filing please find the Department's *Second Letter to Extend Deadline* in the above-captioned matter.

I hereby certify that a copy has been sent to all parties of record as indicated by the Certificate of Service.

Very truly yours,

A handwritten signature in black ink, appearing to read "LJB", written over a horizontal line.

Leah Jo Bobula  
Assistant Counsel

Cc: Parties of Record  
John Pfeiffer  
Mara Johnson  
Sarah Fenton  
Mark Chappell

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Complaint filed by Reading Blue Mountain :  
& Northern Railroad Company involving : Docket No. C-2020-3016906  
the deteriorated condition of the railroad :  
crossing surface and roadway approaches : Electronically Filed  
at the public crossing (DOT 361 425 J) :  
where SR 2019 (Oak Street) crosses, at :  
grade, the tracks of Reading Blue Mountain :  
& Northern Railroad Company, located in :  
the Pittston Township, Luzerne County. :**

Dear Secretary Homsher,

The Commonwealth of Pennsylvania, Department of Transportation (the Department), by its counsel, Leah Jo Bobula, files this second letter requesting to extend the deadline Reading Blue Mountain & Northern Railroad Company (Reading Blue Mountain) has to file construction plans according to the Recommended Decision on December 14, 2022, and the subsequent Order and Opinion on April 20, 2023. Reading Blue Mountain filed the required crossing surface construction plan on November 21, 2025. The Department did not object to the information provided on that plan. However, Reading Blue Mountain did not fully provide the required information on that plan based on the language in the April 20, 2023, Order. The Department first sought an extension until January 30, 2026. After discussion with Reading Blue Mountain, the Department is requesting to extend the deadline again until March 6, 2026, to provide full construction plans for the Department's review.

Reading Blue Mountain is in agreement with this extension.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



Dated: January 29, 2026

---

Leah Jo Bobula Assistant Counsel  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, PA 17105-8212  
Telephone No.: (717) 787-3128  
[Lbobula@pa.gov](mailto:Lbobula@pa.gov)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Complaint filed by Reading Blue Mountain :  
& Northern Railroad Company involving : Docket No. C-2020-3016906  
the deteriorated condition of the railroad :  
crossing surface and roadway approaches at : Electronically Filed  
the public crossing (DOT 361 425 J) where :  
SR 2019 (Oak Street) crosses, at grade, the :  
tracks of Reading Blue Mountain & :  
Northern Railroad Company, located in the :  
Pittston Township, Luzerne County. :**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below, in accordance with the requirements of 52 Pa. Code §1.54, by:

**Electronic Mail**

Reading Blue Mountain & Northern RR  
Jolene Busher  
1 Railroad Blvd.  
P.O. Box 218  
Port Clinton, PA 19549  
[jbusher@readingnorthern.com](mailto:jbusher@readingnorthern.com)

Rick Stock Law  
Edwin L. Stock, Esquire  
50 N. 5th Street 4th Floor  
Reading, PA 19601  
[estock@rrslegal.com](mailto:estock@rrslegal.com)

John Dean, Esquire  
Corey Calpin, Esquire  
Elliott Greenleaf & Dean  
15 Public Square, Suite 310  
Wilkes-Barre, PA 18701  
[jgd@elliottgreenleaf.com](mailto:jgd@elliottgreenleaf.com)  
[cjc@elliottgreenleaf.com](mailto:cjc@elliottgreenleaf.com)

John Kantner, Esquire  
Fanelli Evans & Patel, P.C.  
One Mahantongo Street  
Pottsville, PA 17901  
[jkantner@feplawyers.com](mailto:jkantner@feplawyers.com)

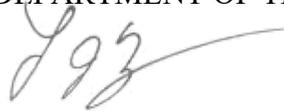
John P. Finnerty, Solicitor  
Pittston Township  
421 Broad Street  
Pittston, PA 18640  
[Pitttown@comcast.net](mailto:Pitttown@comcast.net)

Romilda Crocamo, Esquire  
Luzerne County Office of Law  
200 N River Street  
Wilkes-Barre, PA 18711  
[Romilda.crocamo@luzernecounty.org](mailto:Romilda.crocamo@luzernecounty.org)

Leonard Angelo Sanguedolce, Esq.  
Sanguedolce Law Offices PC  
159 South Main Street  
Pittston, PA 18640  
[lsanguedolce@yahoo.com](mailto:lsanguedolce@yahoo.com)

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION



---

Leah Jo Bobula  
Assistant Counsel  
Office of Chief Counsel  
P.O. Box 8212  
Harrisburg, PA 17105-8212  
Telephone No.: (717) 787-3128  
[lbobula@pa.gov](mailto:lbobula@pa.gov)

DATED: January 29, 2026