# EASTMAN & SMITH LTD.

ATTORNEYS AT LAW

Established 1844

May 25, 2011

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The Public Utilities Commission of Ohio Docketing Division 180 East Broad Street Columbus, Ohio 43215-3793

11-3182-RR-RCP

Re: In the Matter of the Request of Norfolk Southern Railway Company to Modify Warning Devices at the Seneca County Line Road Grade Crossing (472394U) in Seneca County, Ohio PUCO Case No. Our File No: N1432/176814

Dear Docketing Clerk:

Enclosed for filing are an original and seven (7) copies of a Request to Modify Warning Devices. Please file this pleading and then return a date-stamped copy to me via the enclosed, stamped envelope.

Please call me - at (419) 241-6000 - if you have any questions or concerns.

Thank you.

Very truly yours,

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## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Request of Norfolk Southern Railway Company	:	Case No.
to Modify Warning Devices at the	•	<b>REQUEST TO MODIFY</b>
Seneca County Line Road Grade		WARNING DEVICES
Crossing (472394U) in Seneca	:	
County, Ohio		D. Casey Talbott (0046767)
	:	(Counsel of Record)
		Mark W. Sandretto (0079536)
	:	EASTMAN & SMITH LTD.
		One SeaGate, 24 <sup>th</sup> Floor
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		Fax: (419) 247-1777
	•	
		Attorneys for Norfolk Southern
	•	Railway Company

Norfolk Southern Railway Company respectfully requests the Commission's authority to remove a "No Turn" signal at the Seneca County Line Road grade crossing (472394U) in Green Springs, Seneca County, Ohio.

A memorandum in support is attached.

Respectfully submitted,

EASTMAN & SMITHLTD.

D. Casey Talbott / Mark W. Sandretto One SeaGate, 24<sup>th</sup> Floor P.O. Box 10032 Toledo, Ohio 43699-0032 Telephone: (419) 241-6000 Fax: (419) 247-1777

Attorneys for Norfolk Southern Railway Company

### MEMORANDUM IN SUPPORT

The signalization at the above-referenced crossing includes a "No Turn" signal located on the west side of the crossing.

This signal was directed toward a driveway which formerly entered the roadway from a private property. The driveway has since been relocated, further west, thereby obviating the need for the "No Turn" signal.

For the foregoing reasons, Norfolk Southern respectfully requests the Commission's authority to remove the "No Turn" signal. (See attached color-copies of two photographs of the involved crossing, including the signal to be removed.)

### **PROOF OF SERVICE**

A copy of the foregoing *Request to Modify Warning Devices* was e-mailed this  $25^{\prime}$  day of May, 2011, to: Leah Thomas-Dalton, Transportation Department, Railroad Commission, Public Utilities Commission of Ohio, 180 East Broad Street, Columbus, Ohio 43215; Susan J. Kirkland, Manager, Grade Crossing Safety Programs, Ohio Rail Development Commission, 1980 West Broad Street, 2<sup>nd</sup> Floor, Columbus, Ohio 43223; and Mark R. Zimmerman, Seneca County Engineer, 3300 South Township Road 151, Tiffin, Ohio 44883.

Attorneys for Norfolk Southern Railway Company



