National Railroad Passenger Corporation,

Attention: Eleanor D. Acheson, Executive Vice President, General Counsel and Corporate Secretary, Law Department,

One Massachusetts Avenue, NW,

Washington, DC 20001

Dear Ms. Acheson,

I am writing to you today in response to the decision made on my FOIA request labelled 23-FOI-00344 which I received a partial response, but largely a denial. The request was for:

“- Complete course descriptions and syllabi for elements of the locomotive engineer training program

- All training materials given to locomotive engineer trainees including, but not limited to, digital text files such as PDF and Microsoft Word documents, copies of any materials physically given to trainees without a digital equivalent, and any computer applications utilized by locomotive engineer trainees to receive instruction remotely.

- Lecture materials including, but not limited to, powerpoint presentations, assignments, instructor-provided lecture notes, videos of lectures both pre-recorded and live recorded if distributed to trainees, written tests/assessments taken by the trainees without enclosing the answer key for aforementioned tests,

- Any instructional guides given to locomotive engineer training participants, as well as used by locomotive engineer training instructors, both created by Amtrak as well as those created by a third-party vendor and supplied to Amtrak and used for training locomotive engineers .

- Amtrak's operating rules, operating manuals and procedures for the ACS-64, P32AC-DM, and Acela Express trainsets, and any other resource that Amtrak would provide to a locomotive engineer trainee.

- For the above requests, if a type of material given to a trainee differs based on base location and route assignment, select only the material given to a trainee who would be qualifying for locomotive operation on the Northeast Corridor either operating a Northeast Regional service or on an Acela Express service if possible.

- Any materials not mentioned above given to locomotive engineer trainees over the course of their training program to become qualified both to operate Amtrak equipment in general, as well as on the Northeast Corridor operating the Northeast Regional and Acela Express services in particular.”

In response to this query, I received the New Hire Passenger Training Program Overview but was told that the rest of the documents responsive to my inquiry were exempt under FOIA Exemptions 2 and 4. Based upon the nature of my request, as well as more clarity on the nature of the potentially responsive documents as indicated by the New Hire Passenger Training Program Overview, I believe that the invoking of these two exemptions were incorrect and that my FOIA request should be responded to in full.

First, consider Exemption 2. This, as you know, protects items that are, “related solely to the internal personnel rules and practices of an agency.”[[1]](#footnote-0) Firstly, several of the reference materials stated and referenced as part of the training program are themselves not the internal rules and regulations of Amtrak such as the NORAC Operating Rules and CSX Operating rules. As such, references to these within the training materials do not constitute internal rules and practices covered by FOIA. As for the Amtrak-specific rules and regulations, such as the operating rules, AMT-2, AMT-3 etc… there is another component to Exemption 2 making it irrelevant, it’s narrow scope which does not apply to the materials requested.

In *Miller v. Department of the Navy*, the Supreme Court emphasized the plain meaning of the Exemption’s text ruling that, “Exemption 2, consistent with the plain meaning of the term ‘personnel rules and practices,’ encompasses only records relating to issues of employee relations and human resources.”[[2]](#footnote-1) While locomotive engineer training on the surface may seem simply a matter of human resources, in actuality the nature of the training, content and management indicate this as a matter more akin to substantive information about operations. The instructors are locomotive engineers, and the supervisor of training and the curriculum is the System General Road Foreman. On the Passenger Engineer training overview,all of the relevant parties consulted to create, and manage, the training program are engaged not in simply “employee relations” but in substantive actions fundamental to the agency’s core function of transporting Americans by rail. Exemption 2, according to the court, cannot be invoked merely due to the files being for personnel use, a but rather can only be invoked in requests about personnel.

An argument to the contrary may cite the Department of Justice’s guidance that among the exempt documents, those that address the, “Selection, placement, and training of employees and . . . the formulations of policies, procedures, and relations with [or involving employees] employees or their representatives."[[3]](#footnote-2) As this request explicitly is for training materials, this may seem on the surface to be a clear case of Exemption 2. This also doesn’t completely take into account the complete nature of locomotive engineer training as being more than just simply a tangential training procedure/polocy but an incisive insight into how the core of railroad operations functions.

Exempting the release of Locomotive Engineer Training materials under Exemption 2, thus goes contrary to how the court intended this exemption to be understood. The court’s interpretation of “rules and practices” specifically refers to tangential information/policies about the conditions of the workplace irrelevant to the agency’s core mission such as, “Use of parking facilities or regulations of lunch hours, statements of policy as to sick leave, and the like…”[[4]](#footnote-3) . Locomotive Engineer Training, in any reasonable persons mind, is an activity that is central to the operations of Amtrak. In this understanding, the guidance by the Department of Justice on exempting training materials should be understood as reflecting the aim of not releasing “trivial training” documents of little public interest in relation to the agency, for example on training the custodians of the Amtrak Headquarters, rather than the training central to core operational practices.

This leads to the critical component of an Exemption 2 request of evaluating public interest. Even if it is determined that the records for the Locmotive Training Engineer Program are indeed to be considered personnel files, there must be a secondary analysis made as to whether the public has any interest in the documents to warrant their release. The reason for this is given in *The Department of the Air Force v. Rose*, where the court stated that Exemption 2 was formulated in part to, “Relieve agencies of the burden of assembling and maintaining for public inspection matter[s] in which the public could not reasonably be expected to have an interest.”[[5]](#footnote-4)

Perhaps unique among federal agencies is the degree to which the public has an interest in the intricate details of Amtrak’s operations. One piece of clear evidence to this point can be seen in the popularity of the video games Train Simulator and Train Sim World, which are marketed to the public as being faithful simulations of rail operations. Amtrak has licensed several routes of these simulations to the developer, the UK-based Dovetail Games. Amtrak even partnered with Dovetail Games in 2021 to wrap one an ACS-64 locomotives in specialized livery promoting the game. Doug Duvall, Amtrak’s Assistant Vice President of Corporate Communications remarked that, “We are honored to collaborate with Train Sim World 2 to bring a special livery to an electric locomotive that fans, employees and passengers in the Northeast can enjoy.”[[6]](#footnote-5) Clearly, Amtrak recognizes the public’s intense interest in realistic locomotive operations in the simulation space, and has actively taken steps to encourage that interest in learning about Amtrak’s operations specifically as it relates to the operation of locomotives in the name of positive PR. This logic, and Amtrak’s actions clearly suggest that Locmotive Engineer Traing, the foundational knowledge upon which the interest Amtrak has attempted to foster is based, is indeed a manner in which the public can reasonably be expected to have enough interest for Amtrak to leverage it in marketing. This meets the bar set by the court demonstrating a clear interest by the public in the contents of the training course, therefore overrulling a potential denial on the finding that the Locomotive Engineer Training materials constitute an internal personnel matter that is exempt from disclosure.

The terms of Exemption 4 are intended to protect “trade secrets and commercial or financial information obtained from a person and privileged or confidential.”[[7]](#footnote-6) Consider what the court defines as a “trade secret.” One interpretation was observed by the District of Columbia Court of Appeals in 1983 in *Public Citizen Health Research Group, Appellant, v. Food and Drug Administration.* The court noted that a common definition sanctioned by district courts and the FDA was derived from the Restatement of Torts, namely that, “[A] trade secret may consist of any formula, pattern, device, or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it.”[[8]](#footnote-7) They note that the district court’s review of the case, that disclosure was predicated on an analysis of whether the manufacturers who produced the document, “Would sustain substantial competitive injury because their competitors would be receiving, free of charge, the benefits of [their] costly research and testing.”[[9]](#footnote-8) However, the court also noted that though the definition above that is applied to private law, its suitability for use in FOIA cases is questionable, with the court remarking that in the context of this particular case, "This definition would classify virtually all undisclosed health and safety testing data as trade secrets.”[[10]](#footnote-9) The other, more restrictive approach to classifying a trade secret that the court looked more favorably upon was promulgated in the *Wisconsin Law Review* covering, “The productive process itself, as opposed to collateral matters of business confidentiality…”[[11]](#footnote-10) Therefore for the purposes of Exemption 4, the court ruled that a “trade secret” was, “A secret, commercially valuable plan, formula, process, or device that is used for the making, preparing, compounding, or processing of trade commodities and that can be said to be the end product of either innovation or substantial effort.”[[12]](#footnote-11)

Applying this to the FOIA request above, while it is clear that the operating procedures and course material for the Locomotive Engineers Training course could be viewed as an end product of “substantial effort,” the case for the items requested being either “commercially valuable” or truly “secret,” required components of the statute is weak.

First, the nature of American passenger railroads renders much of the discussion about the commerical/competitive value of Amtrak’s operations training moot. Of the Class I railroads in the United States as defined by the Surface Transportation Board, Amtrak is the only passenger carrier[[13]](#footnote-12), and this training program, as enumerated in the Passenger Engineer Training Program Overview, is to become a Class I- Train Service Engineer operating passenger service, a program which is not commercially valuable to any of the other Class I freight railroads who solely conduct freight operations. Freight operations are significantly different enough from passenger service that there is no competition for which Amtrak will lose a commercial edge with.[[14]](#footnote-13) As for it’s commercial significance to hypothetical future Class I passenger railways, there are currently no passenger railroads with plans to expand to an extent that would enable them to be classifoed as Class I in the near future (Brightline, the only competitor, only has one line and six stations[[15]](#footnote-14)).

Commuter railroads such as the Long Island Railroad, likewise will not attain commercial value from the disclosure of these documents as their operating models are also fundamental different from Amtrak. Commuter railroads are oriented towards transporting people from suburbs, to a Metropolitan area’s CBD. As such, their operating equipment and practices, such as using multiple unit locomotives, carrying more passengers, and a lack of reservations are fundamentally different from Amtrak.[[16]](#footnote-15) Even railroads, such as Metro-North who provide some form of inter-city transportation such as between New York City and New Haven as a part of their service, do not compete with Amtrak. The price points for the same route are drastically different, as are the nature and speed of service (3 intermediate stops[[17]](#footnote-16) as opposed to potentially 30[[18]](#footnote-17) on the Metro-North) attracting a different passenger demographic than the Metro-North, and showcasing that operationally, Amtrak and Metro-North are fundamentally distinct and non-competitive. Therefore, any information about Amtrak’s locomotive engineer training that is released to the public is not commercially valuable or liable to cause commercial harm to the agency.

Furthermore, for a trade secret to retain that status, the information must remain a secret. In *Taylor v. Babbit*, The District Court for the District of Columbia affirmed that, “It is well established that the actual public disclosure of trade secrets eliminates the trade secret status of such information.”[[19]](#footnote-18) Of the documents listed as references upon which the other material in the training course is based, many of them, including locomotive manuals, operating rules, and airbrake manuals can be purchased on various auction sites both vintage and current.[[20]](#footnote-19) Moreover several of the operating rules and manuals can be found with ease on the internet both on forums as well as on the Internet Archive.[[21]](#footnote-20) The same applies to the operating rules of the other railroads such as CSX.[[22]](#footnote-21) The widespread tolerance of the sale of these materials, as well as the ease with which they can be found online both in terms of actual materials as well as the equivalent information from former employees on various railfan discussion boards.

These factors also apply to the physical characteristics training as well. The information on physical characteristics, including speed limits, track layouts, signal locations etc… are easily attainable with Google Maps. To reference Dovetail Games again, an article on Amtrak’s partnership with them noted that,“ It’s not the track arrangements and lineside scenery that [Dovetail] needed information about — that can all be seen on Google Maps…”[[23]](#footnote-22)

The second aspect of Exemption 4 that must be addressed is the exemptions recognition of, “Information that is: “(1) commercial or financial; (2) obtained from a person, and (3) privileged or confidential.”[[24]](#footnote-23)

What is a commercial or financial interest? In *Citizens for Respomsibility and Ethics in Washington v. United States Department of Justice*, the DC Circuit noted that the critical factor is the, “nature of the information itself,” adding that, “the commercial consequences of disclosure are not on their own sufficient to bring confidential information within the protection of Exemption 4 as ‘commercial.’”[[25]](#footnote-24) Moreover, the court recognized in *Critical Mass Energy Project v. Nuclear Regulatory Commision*, that the “character of the information” [[26]](#footnote-25)is the crucial factor. To be considered commercial, the disclosure of responsive items would have to result in a, “[material] affect [on] profitability”.[[27]](#footnote-26)

In Amtrak’s case, none of the documents or materials that have been shown to comprise the Locomotive Engineer training program can meet the requirements of being commercially valuable enough so as to result in a material effect on profitability. As mentioned above, Amtrak is in a class by itself regarding competition, with essentially no competition now, or in a future timeframe before such documents would be subject to declassification due to obsolescence. As such, the release of these documents would not result in a “material” impact on Amtrak’s profitability. This is, again, without even considering that much of this information can already be found on the internet in various forums, essentially negating the argument of a disclosure resulting in a unique loss of comercial value. As such, even if the information about training locomotive engineers would advance the interests of another railroad, much of this information would already be able to be attained by competitor railroads.

Regarding information “obtained from a person,” the court in *Stone v. Export-Import Bank of United States* defined the scope of this clause as regarding, “An individual, partnership, corporation, association, or public or private organization other than an agency.” [[28]](#footnote-27)Thus, if materials were produced by a private entity under contract with Amtrak, for example by Alstom or General Electric, on the surface this clause, may have applied. However, the court in *Philadelphia Newspapers, Inc. v. Dept. of Health Hum. Serv.* ruled that documents which “[involves] analysis, and [that] analysis was prepared by the government.”[[29]](#footnote-28) are not exempt under the clause of “obtained by a person” as when the government conducts such analysis, the document becomes one that is being obtained by the agency rather than the private entity. In Amtrak’s case, although some of these materials may have been created by a private entity, Amtrak surely reviewed and analyzed the submission of materials from private entity’s to support their training materials to determine potential revisions. As such, these documents no longer simply become a private entity’s creation under this formulation, but rather it became Amtrak’s property as well, and therefore is not covered under this exemption.

Finally, let us address the notion of whether these documents are “privileged” or “confidential.” On the subject of “privilege,” in *Sharyland Water Supply Corp. v. Block* the Fifth Circuit of the United States Court of Appeals ruled that this, “refers only to privileges created by the Constitution, statute, or the common law.”[[30]](#footnote-29) Examples cited by the court included such things as attorney-client privelage, marital privelage, and the Fifth Ammendment. Given that the Supreme Court in *Chamber of Commerce of the United States v. Legal Aid Society of Alameda County* emphasized that FOIA, “"creates no privileges. . . . neither does it diminish those existing”[[31]](#footnote-30) the documents requested do not fall under most of these such as, attorney-client privilege, or that of a trade secret which was discussed above. However, there is the matter of this information being considered a “secret of the state” which would be subject to privilege. This will be discussed below in the context of the third item of exemption 4, whether this disclosure is confidential and would harm national security.[[32]](#footnote-31)

In order for something to be considered confidential, the Supreme Court in *Food Marketing Institute v. Argus Leader Media,* held that, “where commercial or financial information is both customarily and actually treated as private by its owner and provided to the government under an assurance of privacy, the information is 'confidential' within the meaning of Exemption 4.” [[33]](#footnote-32) However, there are some important things to note about this ruling. First, the Department of Justice, in it’s post-*Argus Leader,* guide to FOIA requests, notes that the first question to be answered is whether the information is usually kept, “private or closely-held…[as]determined from industry practices concerning the information.”[[34]](#footnote-33) Again, as mentioned above much of the substantive information conveyed within the training materials have been released by members of the public informally on forums, formally on various websites, and by Amtrak themselves to Dovetail Games as part of their collaboration with the development group.[[35]](#footnote-34) Through Amtrak’s opening of their facilities and operations to Dovetail Games in order to facilitate the simulation of locomotive operations accurately and publicizing this fact, the agency has shown that this information is not generally kept “private” as the guidance requires, but discloses the details of these operations to outside parties. Even if one suggests that these factors still constitute an overall case of information being kept private or closely held due to this information being released only very selectively, for DOJ questions two and three, when the question of whether assurances were provided that this information would be shared publicly, Amtrak also fails this test. Amtrak’s willingness to share this information with Dovetail Games in designing a realistic simulation entertainment product, and Amtrak’s tolerance of the sharing and selling of many of these materials, or the practical results from their content (ie: informal information about mileposts and speed restrictions) over the internet, demonstrates little to no presumption of confidentiality at the time of creation of such materials. In other words, information suitable to be shared with a private foreign entertainment company for the purpose of consumption by the public and whose contents distribution is tolerated, cannot be considered to have been created under a presumption of confidentiality.

Even if under the Department of Justice’s guide, these documents are found to be defined as exempt, this analysis of the court’s decision in *Argus Leader* does not address its interaction with the Forseeable Harm Standard, an ammendment to FOIA passed in 2016 and thus irrelevant to the court’s analysis of an action predating that. In an *amicus brief* to the court by a group of Freedom of Information Act and First Ammendment Scholars, it is suggested that, “​​The foreseeable harm standard parallels (if not surpasses) the pro-disclosure nature of the National Parks test. Therefore, defining the term “confidential” under Exemption 4 will be inconsequential to FOIA requests that post-date codification of the foreseeable harm standard because agencies and lower courts will have to engage in a National Parks-type analysis, whether through the term “confidential” or through the foreseeable harm standard. The source of law is a distinction with little difference…”[[36]](#footnote-35)

The implication of this manifested itself in the Second Circuit’s decision in *Seife v. United States Food & Drug Administration*, the first case to address Exemption 4 post-*Argus Leader*. In *Seife*, the court ruled that, “The interests protected by Exemption 4 of FOIA are the commercial or financial interests of the submitter in information that is of a type held in confidence and not disclosed to any member of the public by the person to whom it belongs… [and that] Congress expressly enacted the FIA to address situations where information would fall within an exemption and yet no harm would result from disclosure, emphasizing that in those circumstances the information must be disclosed."[[37]](#footnote-36) The court also ruled that the grounds for exemption on the basis of “simpl[e] confidentiality" is not valid. Thus, the arguments for exemption on financial/commerical harm basis are irrelevant as manifested in evaluating the notion of commercial harm and trade secrets above, as well as the idea that these items are “simply confidential” material.

The final component to address is the issue of national security. Amtrak likely argues that the releasing of complete information on how locomotive engineers are trained and operated are a security risk that therefore should not be disclosed so that bad actors cannot use this information to cause havoc and attack the train systems. However, in the many analysis of threats to the rail system and defending it that have been conducted, the disclosure of the specifics of locomotive training and operation have never been identified. In a monograph for on “Protecting Critical Rail Infrastructure” written for the US Air Force Counterproliferation Center Future War Series, protecting knowledge of physical charecteristics, training processes, or operational processes from bad actors is never discussed at all.[[38]](#footnote-37) That being said, some research does identify the use of “inside information” as being a factor in some security-related incidents. However, in all of the cases mentioned in the research about inside information being utilized, the inside information related to knowledge of sophisticated train car electronics and track circuits rather than the specifics of the operation of the train.[[39]](#footnote-38) [[40]](#footnote-39) Even the National Infrastructure Protection Plan, which outlines principles and goals for protecting critical infrastructure assets including the rail network, does not discuss the need for secrecy of training and operations details.[[41]](#footnote-40)

 Moreover, the access given to Dovetail Games to accurately model the interiors and operations of locomotives, ACSES signalling, and service patterns of Amtrak service for their Train Sim World and Train Simulator series, undermines this principle. Although Amtrak, in press statements discussing the partnership with Dovetail Games, noted that certain things were depicted with “artistic license” for security reasons, the fact remains that accepting this logic requires accepting the far-fetched idea that a government agency can reveal “state secrets” that constitute a “national security risk” to a private, foreign, company for the purpose of the public’s entertainment. If the information is non-sensitive enough to be revealed to a foreign entertainment company for use in entertaining the public, it is certainly non-sensitive enough to be disclosed to the American people whose tax dollars subsidize the continued operation of Amtrak far more than a UK-based video game developer.

Additionally, the cab model created by Dovetail for the game, even with its “artistic license” is likely detailed enough that, combined with simple internet research, can familiarize oneself fairly well with the locomotive anyway. For example, the website Quizlet, has multiple sets of public flashcards for engineers studying the ACS-64 where things such as the locations of brake cutouts, and procedures for cutting out ACSES are given, not to mention the ability to simply buy an ACS-64 manual online.[[42]](#footnote-41) If this information was truly considered a “national security risk” or a “state secret,” such easy access to this knowledge would would contravene the Amtrak’s claiming of a “state secret.” Security-sensitive information bearing this designation would not be allowed to be sold on ebay and viewed on public internet forums.

 Even physical characteristics training, which one might argue poses the greatest security risk, as demonstrated above through knowledge of precise details of track layout, is easily attainable by Google Maps supplemented online railfan forums with posts by former railroad employees on specific restrictions ans signal rules. In fact, it is accessible enough that I would argue that the physical charecteristics information is simply a more official packaging of track layouts and speeds than is already discernable by careful searching of the internet. Thus, it too, is not a “national security risk” or a “state secret.”

Finally, there is the notion of legal precedent for labelling the training materials and regimen for a position such as a locomotive enigneer as a “state secret” or “national security risk.” Such invokations are made in the legal record for details such as a record of a CIA agents service, details of military operations, and precise locations of underwater fiber optic networks. In other words, materials, which if released, would result in critical new information liable to cause the endangerment of American lives and American security. Disclosure of training material for locomotive engineers, simply does not equate to the disclosure of documents regarding the operations of military agencies and services that the legal precedent for invoking this measure suggests.

To summarize the legal basis of this appeal; Exemption 2 was inappropriately applied due to its narrowly tailored focus on human resources/personnel matters which, although exempts from release rules and regulations tangential to the operation of the agencies core functionsuch as those about sick leave, does not exempt material related to the central function of the agencies operation. Moreover, there is a significant public interest in the content of the material in the locomotive engineer training program, evidenced by the large and loyal community of “railfans” who congregate ito learn the specifics of how Amtrak and other carrier operations are conducted, assisted by current and former employees who provide critical detail to those seeking information. This public interest is recognized by Amtrak itself in its partnership with Dovetail Games to produce a highly realistic simulation of several Amtrak routes and locmotive sand their granting access to materials for reference by the Dovetail team. This relationship with Dovetail Games figures prominently in the arguments regarding the inappropriateness of applying Exemption 4. Due to the degree of access granted to Dovetail by Amtrak for the goal of producing an authentically simulated experience of being a locomotive engineer for Amtrak, this is a strong factor in debunking the argument in favor of of the confidentiality clause that Exemption 4 as well as the argument in favor this material being considered “privelaged” due to security risks associated with its content. Multiple analyses done by government and academic institutions have consistently not identified the need to keep information about the specifics of rail operations controlled in order to maintain or improve security. As for the trade secrets and commercial clauses, Amtrak’s unique position without any competitors in its market as a Class I passenger railroad, as well as the proliferation and tolerance of these materials and their content on the internet in various digital locations, renders the notion of this material being “confidential,” “secret,” or commercially/financially valuable, moot. The “personnel” clause of exemption is irrelevant due to the likel nature of any third-party-provided material as being reviewed and analyzed by Amtrak before final approval for use and thus would be considered “agency material.”

I would like to close this letter, with reference to the Justice Department’s advice on releasing materials leaning towards discretionary release. In particular, the observation by the DOJ that, “‘Low 2’ [information] is, by definition, trivial to begin with, thus there would be no reasonably foreseeable harm from release, and discretionary release should be the general rule.[[43]](#footnote-42) Even after *Milner* the Justice Department noted that, “Certainly, there will be many examples of matters relating solely to internal personnel rules and practices where there is no foreseeable harm from release as there is no real burden involved in assembling and maintaining the information. Indeed, it is often more burdensome to withhold information than it is to release it. In the absence of harm, the information should be released as a matter of discretion.”[[44]](#footnote-43)

Even if on a purely legal basis, the case for releasing this information is not technically valid, I think it has been demonstrated to a significant enough degree that the release of information will not substantively harm both Amtrak financially and commercially. As such, I believe that discretionary release would be warranted as both within the spirt of the FOIA law as well as beneficial for the agency as a whole. Amtrak, like other railroads is facing a hiring crises, needing to attract more employees particularly for craft jobs, such as being a locmotive engineer. Considering the recent negative press about working on the railroad, releasing these training materials to show what being a locomotive engineer fully entails would be an excellent way to boost this process. Moreover, it would stimulate a significant amount of positive online discussion about the particulars of Amtrak’s operations as evidenced by the overwhelmingly positive reception simply releasing the Service Standards Manual was met with. That discussion, in turn, may relight a spark of interest in working on the railroad in some readers who, presented with the materials in front of them, going through the materials, know that they not only can be a locomotive engineer, but want to do so as well. What better way to educate the next generation of America’s railroaders then by presenting them with the information to do so themselves?

Thank you for your time and consideration of my appeal,

Sincerely,

Avi Koenig

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14. Freightera, “Passenger Trains vs. Freight Trains,” Freightera Blog, May 9, 2022, https://www.freightera.com/blog/passenger-trains-vs-freight-trains/#:~:text=The%20obvious%20difference%20is%20that. [↑](#footnote-ref-13)
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