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December 22, 2015  
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**Comments of the American Chemistry Council**  
on  
Surface Transportation Board Docket No. EP 724-4  
US Rail Service Issues – Performance Data Reporting

December 23, 2015

The American Chemistry Council (ACC) is pleased to provide comments on the Board's proposed railroad service metrics and on the stakeholder meeting summaries recently posted in the docket. We commend the Board's decision to allow these *ex parte* stakeholder meetings with staff and urge the Board to continue to proactively address ongoing and future service issues. ACC supports the Board's proposed permanent reporting requirements. We also support several key changes suggested by stakeholders to improve the usefulness of the data.

ACC represents the leading companies in the business of chemistry. Our members apply the science of chemistry to provide innovative products and services that make people's lives better, healthier and safer. As an \$812 billion enterprise, the business of chemistry is a key element in the nation's economy. It is also one of the largest exporting sectors, with \$189 billion in 2013 exports that accounted for 12 percent of the U.S. total. The chemical industry is one of the largest customers of the U.S. freight rail system. Thanks to the shale gas revolution, our industry is projected to grow significantly in the coming years, with more than \$140 billion in new factories, expansions, and restarts already announced, meaning that our reliance on the rail system will only increase in the future.

**Permanent, standardized reporting of railroad service metrics benefits all stakeholders**

As noted in numerous meeting summaries, shippers and other stakeholders regularly use railroad service data to understand trends and conditions across the rail network. For example, shippers and receivers utilize the data to help predict equipment turns and forecast freight costs. While railroads individually make select metrics available, this data is not always consistent between railroads. As highlighted in the STB's summary of its meeting with the Association of American Railroads (AAR), "railroads often measure the same issues in different ways." The STB's current reporting requirements provide much-needed standardization as well as timely and predictable reporting intervals. While the initial requirements were prompted by the severe service disruptions seen in the winter of 2013/2014, the timely reporting of standardized service metrics continues to provide significant benefits. It would make little sense to discontinue the program now.



If continued on a permanent basis, these reporting metrics will provide important baseline data to allow rail customers, the STB and others to compare service performance trends across time. As noted by the National Grain and Feed Association (NGFA), rail service metrics can provide an early alert of impending service disruptions, allowing shippers and receivers critical additional time to mitigate the business harm and economic loss if and when those disruptions occur. We agree with comments by the US Department of Agriculture (USDA) that reporting requirements had been in place before recent service challenges, the problems would have been identified sooner and the situation may have been less disruptive. The ability to track and predict service issues will become increasingly important as freight volumes are expected to increase dramatically and further challenge infrastructure capacity.

**STB should adopt key changes to improve granularity and usefulness of the data**

ACC agrees with many of the changes suggested by shippers and other stakeholders in the *ex parte* meetings with staff. In particular, the Board should collect and report data on commodity carloads for more than just grain and coal. We agree with suggestions by NGFA and others to provide granular data on additional significant commodities, including grain-derived products, ethanol, fertilizer, coal, chemicals, crude oil, intermodal and automotive. As noted in the summary of comments by the US Department of Agriculture, “such data would provide an important layer of detail to shippers and policy makers that would enable them to respond to the specific circumstances of a rail disruption.”

ACC also supports the proposal from BASF Corporation to have, in addition to weekly reporting, trend data reported over a 12-month period. This would further increase transparency and accountability, recognizing a key benefit of these metrics is to track and identify longer-term trends in service performance.

**STB should continue to improve accessibility of service data and website functionality**

The STB should give careful consideration to suggestions to enhance the accessibility of data, including suggestions from the USDA and NGFA regarding the format and organization of data files provided by the Board. In addition, the Board should continue efforts to improve its website and make access to the rail service data more user-friendly for all stakeholders.

Thank you again for providing the opportunity for stakeholders to meet with STB staff and to review and comment on the meeting summaries. If you have any questions about this submission, please contact me at [jeffrey\\_sloan@americanchemistry.com](mailto:jeffrey_sloan@americanchemistry.com) or (202) 249-6710.

Sincerely,

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