Comments of the Rail Customer Coalition
on
Surface Transportation Board Docket No. EP 704-1
Review of Commodity, Boxcar and TOFC/COFC Exemptions

July 25, 2016

The Rail Customer Coalition (RCC) is pleased to provide these opening comments on the Surface Transportation Board's (STB) proposal to revoke class exemptions for certain commodity groups. The RCC strongly supports STB action to reconsider existing exemptions and to restore shippers' access to the Board's regulatory oversight and processes. STB action is long overdue.

The RCC is a large collection of trade associations representing a broad cross section of manufacturing, agricultural, and energy industries with operations and employees throughout the United States. Members of the coalition represent many of the largest users of freight rail that depend on the railroads to deliver reliable and affordable service in order to remain competitive in a global market. The RCC supports practical reforms that could make the STB operate more efficiently and effectively for all stakeholders. More information about the RCC and its membership can be found at www.freightrailreform.com. Individual RCC member groups may submit more detailed comments in this proceeding for the specific commodity sectors they represent.

Railroad consolidation and rate trends demonstrate an overall increase in railroad market power

As noted by the Board, more than 30 years have passed since many of the commodity exemptions were adopted, and there have been dramatic changes in the railroad industry over that period. Most significantly, the industry has consolidated from 26 Class I railroads to just seven, with four railroads handling 90% of the nation's freight rail traffic. A large majority of freight rail stations are served by a single Class 1 railroad, leaving many shippers with no effective rail competition.

Overall rate trends also point to increased market power of railroads. Similar to the Board's waybill analysis conducted for specific commodities in this proceeding, a recent study by Escalation Consultants (see attached) examined data from the Public Use Waybill sample for all major commodity groups other than intermodal. This data was analyzed for 2014, the most recent year available, as well as for 2005. The analysis demonstrates a general shift towards higher RVC ratios across commodity groups. From 2005 to 2014 the number of carloads with

RVC ratios above 180% jumped by 40%, going from 9.3 million to 13 million cars. The number of carloads with very high rates (RVCs exceeding 300%) increased nearly 50% over this time period, going from 3.3 million cars in 2005 to 4.9 million cars in 2014.

These changes strongly suggest that the original findings used to support existing commodity exemptions (i.e., that traffic for these commodities was sufficiently competitive and that railroads lacked the ability to subject shippers to an abuse of market power) may no longer be valid.

STB provides ample support for its proposal to revoke specific exemptions

The Board proposes to revoke the commodity exemptions for crushed or broken stone (STCC No. 14-2), coke produced from coal (STCC 29-914), primary iron or steel products (STCC 33-12), hydraulic cement (STCC 32-4) and iron or steel scrap, wastes or tailings (STCC 40-211). The proposal is supported by two compelling pieces of evidence, a significant increase in RVC ratios over the last two decades and a higher percentage of potentially captive traffic (rates above 180% RVC) for each of these commodity groups. RVC ratios, while not a perfect metric, provide a strong indication of railroad market power. When viewed in light of overall railroad trends discussed above, it provides a sound basis to conclude that railroad market power has increased, and that shippers of these commodities should have access to the Board's oversight and processes.

Revoking commodity exemptions will not significantly increase regulatory burdens on railroads. The Board's proposal merely acknowledges that shippers of the specified commodities *may* face railroad market power. No railroad will be significantly impacted unless it is proven to exercise actual market power over specific traffic in a future Board proceeding. Conversely, maintaining these exemptions may deny shippers their only potential recourse to challenge actual abuses of railroad market power.

The public comment period in this proceeding provides appropriate opportunity to bring forward additional data and information for Board consideration. However, absent strong evidence to the contrary, the existing record in this proceeding provides ample support to revoke these commodity exemptions.

STB should provide a broad analysis of all commodity exemptions

The RCC agrees with Commissioner Miller that the Board should have provided an analysis of all commodities that are currently exempt from regulation. Regardless of the results, such analysis would strengthen the Board's record in this proceeding. We commend Commissioner Miller for seeking additional analysis from the Board's Office of Economics. Stakeholders should have an opportunity to review and comment on this work.

John Michael Meenan
700 2nd St NE
Washington, DC 20002
michael_meenan@americanchemistry.com

Analysis of 2014 Freight Rail Rates for U.S. Shippers

Prepared for
Rail Consumer Coalition

By
Escalation Consultants, Inc.
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4 Professional Drive Ste. 129
Gaithersburg, MD 20879
(301)977-7459
EscalationConsultants.com

Analysis of 2014 Freight Rail Rates for U.S. Shippers

Methodology

For this study, Escalation Consultants examined Class I railroad rate data from the Surface Transportation Board's (STB) Public Use Waybill sample for all major commodity groups shipped by rail other than intermodal. Movements in the Waybill are provided by the railroads to the STB and this data was analyzed for 2014, the most recent year available from the STB, as well as for 2005. Escalation Consultants calculated the railroad's revenue-to-variable-cost ratio (RVC) for each shipment that originated or terminated in the U.S. An RVC is an important indicator for freight rail rates because a rate with an RVC greater than 180% is subject to potential STB review for being unreasonably high.

For each group of related commodities, Escalation Consultants calculated the average rate for shipments below a 180% RVC (those assumed to be competitive) and the average rate for shipments above a 180% RVC (those potentially non-competitive and subject to STB jurisdiction). The difference between these average rates is presented as the shipper's rate 'premium' in this analysis. Escalation Consultants further broke down the potentially non-competitive rates by RVC ranges (180-240%, 240-300% and above 300%) to show the impact of the highest rates on the total premium. Data are reported for all commodities combined, as well as for major commodity groups (2-digit Standard Transportation Commodity Code (STCC)) and individual products (5-digit STCC) within each group for traffic originating in different geographic regions.

Further details on the methodology and the breakdown by geographic region are provided in Appendices 1 and 2.

Key Findings

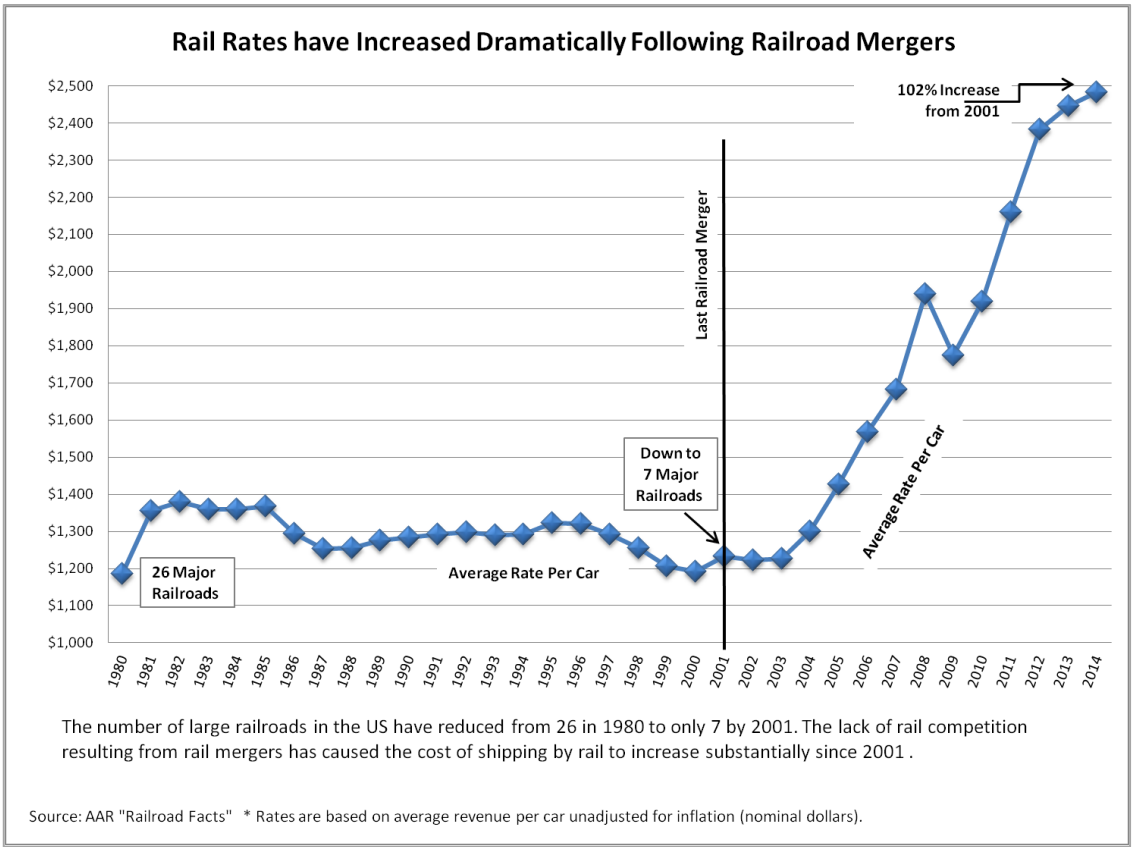
The findings in this analysis are based on the rates for railroad movements in the 2014 and 2005 Public Use Waybill sample. The findings show that:

- In 2014, sixty-four percent (64%) of all rail rates exceeded a 180% RVC, the threshold for a potential rate challenge before the STB.
- The average rate for carloads above 180% RVC was $1,490 higher than the average rate for carloads below a 180% RVC, meaning that shippers paid almost a 45% premium (44.8%) for these shipments.
- As a result, the total rate premium paid by commodity shippers in 2014 was over $19 billion ($19.35 billion).
- The commodity groups with the largest total rate premiums were chemicals ($5.6 billion), coal ($3.5 billion) and nonmetallic minerals ($1.5 billion).
- Many rates were far above the STB's RVC jurisdictional threshold of 180%; for example, nearly, one out of every four moves (24.3%) had an RVC of 300% or greater.
- From 2005 to 2014, the total rate premium paid by commodity shippers increased 126.4% ($8.5 billion to $19.3 billion), while the carload volume increased by only 2.8%.
- Total carloads increased by 2.8% between 2005 and 2014, while there was a 40% increase in the number of carloads with premium rates (9,276,985 carloads in 2005 versus 12,988,310 carloads in 2014).

Background: Current Landscape and Summary of Existing Rail Rate Data

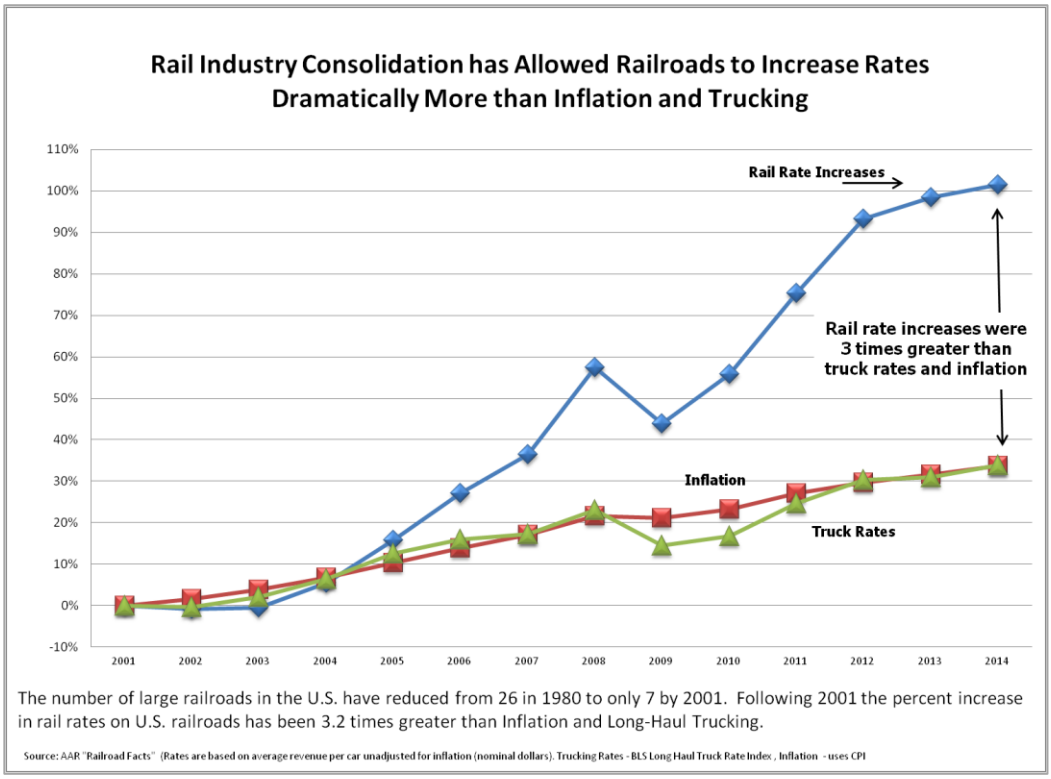
American manufacturers rely on the nation's freight railroads to move many of their products to their customers. These materials and products serve as the foundation for the U.S. economy and ultimately wind up in grocery stores, car dealerships, power plants, and people's homes.

Since the last major freight railroad reform legislation more than 30 years ago, railroads consolidated from twenty-six (26) major carriers to seven (7). With limited competition, freight rail rates increased 102% since 2001 – more than three times the rate of inflation and more than three times as much as truck rates have increased.



The number of large railroads in the US have reduced from 26 in 1980 to only 7 by 2001. The lack of rail competition resulting from rail mergers has caused the cost of shipping by rail to increase substantially since 2001 .

Source: AAR "Railroad Facts" * Rates are based on average revenue per car unadjusted for inflation (nominal dollars).



Excessive rates can burden U.S. manufacturing and provide a competitive advantage to foreign producers. To better understand these impacts, Escalation Consultants conducted an analysis to quantify the premiums railroads charge U.S. manufacturers.

Results from Analysis

The premiums for shippers in this study are broken out by each two-digit Standard Transportation Commodity Code (STCC) and by year (2005 and 2014). The study also explored how the volume of shipments changed between 2005 and 2014 to determine if greater demand led to an increase in the premium for shipments. Finally, the analysis also includes a detailed breakout of high RVC ratios (180% - 240%, 240% - 300%, and greater than 300%).

The premium for movements with rates above a 180% RVC in this study are also broken out for each of the five rail territories in the U.S. Furthermore, detailed tables for major commodity groups as well as

regional data are in Appendix 1 and 2. Additional support for results are included in Exhibits A, B, C, D and E.

RVC Ranges and Rate Premium for all Commodities (2014)

In 2014, well more than half (64%) of all rail rates exceeded a 180% RVC, resulting in a total rate premium over $19 billion ($19.3 billion). These rates are further broken out by RVC range. This breakdown shows that 39.5% of all freight rail traffic has more than a 240% RVC, while nearly one in four shipments had an RVC greater than 300%. Most of the premium for rates above a 180% RVC is generated from movements with RVC's greater than 300% as they represent $11.8 billion of the $19.3 billion premium for rates above a 180% RVC. The table below shows the breakdown of all rail traffic with RVC's above 180% and the premium paid for these movements by RVC range.

Breakdown of Rate Premium by RVC Range		
RVC Range	**Percentage of Total Carloads**	**Premium for Rates Above 180% RVC**
180-240	24.7%	$4.4 Billion
241-299	15.2%	$4.4 Billion
>300	24.3%	$11.8 Billion
Total above 180	**64.2%**	**$19.3 Billion**

Commodity Groups with Highest Total Rate Premiums (2014)

The commodity groups with the largest total rate premiums were chemicals ($5.6 billion), coal ($3.5 billion) and Non-Metallic Minerals ($1.4 billion). The average rate for carloads above a 180% RVC was $1,490 higher than the average rate for carloads below 180% RVC, meaning that shippers on average paid around a 45% premium (44.8%).

Top Ten Highest Rate Premiums					
STCC	**Description**	**% Total Carloads Above 180% RVC**	**Premium Per Carload**	**2014 Premium as Percentage Above Competitive Rate**	**Total Premium**
28	Chemicals or Allied Products	82.0%	$2,818	54.9%	$5,582,072,745
11	Coal	56.0%	$942	30.7%	$3,465,259,834
14	Nonmetallic Minerals Except Fuels	79.0%	$1,076	27.5%	$1,461,448,268
37	Transportation Equipment	41.0%	$1,530	47.4%	$1,240,156,269
20	Food & Kindred Products	56.0%	$1,651	37.0%	$1,161,187,129
29	Petroleum or Coal Products	82.0%	$1,705	26.0%	$1,000,718,313
13	Crude Petroleum, Natural Gas or Gasoline	76.0%	$2,194	39.2%	$988,454,807
01	Farm Products	66.0%	$907	17.4%	$890,681,632
33	Primary Metal Products	78.0%	$1,663	38.5%	$867,202,318
32	Clay, Concrete, Glass or Stone Products	85.0%	$1,751	38.5%	$760,016,883
	Total All Commodities	**64.0%**	**$1,490**	**44.8%**	**$19,351,795,013**

Percent of Carloads by RVC Range and Commodity (2014)

The study assessed the RVC ratios for major commodity groups. The table below provides the percentage of carloads with RVCs between, 180-240%, RVCs between 240-300%, and RVCs above 300%.

Breakdown of Carloads With Non-Competitive Rates by RVC Range and Commodity				
STCC	**Description**	**% Total Carloads Between 180% RVC and 240% RVC**	**% Total Carloads Between 240% RVC and 300% RVC**	**% Total Carloads Greater than 300% RVC**
01	Farm Products	41.0%	15.8%	9.6%
10	Metallic Ores	28.6%	24.9%	11.3%
11	Coal	18.1%	10.8%	27.4%
13	Crude Petro, Nat Gas & Natural Gas	37.3%	24.1%	14.7%
14	Nonmetallic Minerals Except Fuels	23.5%	21.7%	33.8%
20	Food & Kindred Products	32.2%	12.6%	11.0%
24	Lumber or Wood Products	28.1%	14.4%	10.2%
26	Pulp, Paper or Allied Products	29.8%	18.3%	16.0%
28	Chemicals or Allied Products	22.9%	17.6%	41.4%
29	Petroleum or Coal Products	25.7%	20.5%	35.6%
32	Clay, Concrete, Glass or Stone Products	25.7%	21.4%	37.8%
33	Primary Metal Products	27.0%	18.5%	32.7%
35	Machinery Exc. Electrical	6.4%	12.1%	79.1%
36	Electrical Machinery, Equipment/Supplies	21.7%	8.5%	19.7%
37	Transportation Equipment	25.0%	9.4%	6.6%
40	Waste or Scrap Materials	21.5%	20.1%	27.4%
41	Miscellaneous Freight Shipments	15.5%	11.3%	42.5%
48	Waste Hazardous Materials or Waste Hazard	25.6%	26.7%	26.2%
Total		**24.7%**	**15.2%**	**24.3%**

Note: Commodities with a small number of carloads are excluded from the table.
This included STCC's 19, 22, 30, 34, 39, 42 and 44.

Change in Carloads and Premiums (2005 – 2014)

From 2005 to 2014, the total premium paid by shippers increased 126%, while the carload volume increased by 2.8%. This suggests that increased demand is not the primary driver of the big increase in shipping premiums over the last nine years. Hazmat issues also do not appear to be a primary factor in driving rates higher. Farm Products, Coal, Petroleum Products, and Primary Metal Products were among the commodities that showed the sharpest discrepancy between the premium increase and the change in carloads.

Instead, the higher rate premium reflects a general shift towards higher RVC ratios. While there was a small increase in total carloads, the number of carloads with potentially non-competitive rates (RVC ratios above 180%) jumped by 40% from 2005 to 2014 going from 9.3 million to 13 million cars (reference Exhibit A). The number of carloads with very high rates (RVCs exceeding 300%) increased by 49.4% over this time period. Going from 3.3 million cars in 2005 to 4.9 million cars in 2014.

2005 to 2014 Change in Carloads and Rate Premium

STCC	Description	2005 Carloads	2014 Carloads	2005 Premium	2014 Premium	Carload Change	Premium Change
01	Farm Products	1,622,550	1,478,478	$403,753,379	$890,681,632	-8.9%	120.6%
10	Metallic Ores	709,600	860,131	$83,855,137	$222,546,941	21.2%	165.4%
11	Coal	7,565,750	6,536,257	$1,982,059,232	$3,465,259,834	-13.6%	74.8%
13	Crude Petro, Nat Gas & Natural Gas	10,536	591,876	$4,467,957	$988,454,807	5517.7%	22023.2%
14	Nonmetallic Minerals Except Fuels	1,686,771	1,718,488	$265,003,630	$1,461,448,268	1.9%	451.5%
19	Ordinance & Accessories	2,104	1,563	$6,456,448	$7,237,031	-25.7%	12.1%
20	Food & Kindred Products	1,218,389	1,259,985	$546,940,100	$1,161,187,129	3.4%	112.3%
24	Lumber or Wood Products	737,050	484,628	$431,386,357	$439,049,562	-34.2%	1.8%
26	Pulp, Paper or Allied Products	719,988	501,236	$464,916,562	$715,134,017	-30.4%	53.8%
28	Chemicals or Allied Products	2,019,780	2,420,637	$2,434,614,580	$5,582,072,745	19.8%	129.3%
29	Petroleum or Coal Products	799,245	717,079	$426,106,840	$1,000,718,313	-10.3%	134.9%
32	Clay, Concrete, Glass or Stone Products	645,246	511,048	$440,461,084	$760,016,883	-20.8%	72.6%
33	Primary Metal Products	718,946	666,346	$351,596,324	$867,202,318	-7.3%	146.6%
35	Machinery Exc. Electrical	4,405	14,855	$7,264,139	$77,950,997	237.2%	973.1%
37	Transportation Equipment	579,017	1,977,528	$401,305,356	$1,240,156,269	241.5%	209.0%
40	Waste or Scrap Materials	552,582	412,871	$237,041,659	$358,859,144	-25.3%	51.4%
41	Misc. Freight Shipments	14,796	28,711	$21,468,418	$46,542,577	94.0%	116.8%
48	Waste Hazardous Materials	11,796	22,370	$21,700,000	$42,276,224	89.6%	94.8%
Total		**19,672,399**	**20,227,175**	**$8,548,045,008**	**$19,351,795,013**	**2.8%**	**126.4%**

Conclusions

American manufacturers and their customers are experiencing a sharp rise in freight rail rates that is not driven by traditional free-market forces. While demand was similar in 2005 and 2014, the rate premium paid by rail shippers soared. Few commodities have been spared by skyrocketing freight rail rates as both hazardous and non-hazardous shipments have experienced soaring rail rates. One out of every

four shipments today are shipped at rates exceeding a 300% RVC or three times the long term variable cost of the shipment. In 2005, just one in every six shipments faced premiums that high.

Increased demand and liability are clearly not driving freight rail rates. This unique business dynamic provides tremendous pricing power to a handful of freight railroads. This pricing power has given railroads the ability to continually obtain large rate increases from customers that do not have competitive options. The result is that most rail traffic now moves under very high non-competitive rates.

Appendix 1

Methodology for Calculating the Shipper's Rail Rate Premium

The 2014 Public Use Waybill Sample (Sample) was used to calculate the premium paid by shippers to railroads for moving their freight. The Sample represents 100% of all rail shipments that originate or terminate in the U.S. The Sample is a collection of railroad waybill records submitted by railroads to the Surface Transportation Board (STB); it is roughly a 3% sample of all rail movements which is then expanded to represent 100% of all rail traffic. The 2014 Sample consists of 666,220 waybills. Escalation Consultants analyzed 263,444 Sample records, which included all commodity movements in the Sample except for Intermodal. The 263,444 Sample records, when expanded to represent all rail traffic for these types of movements, total to 20,227,175 carloads in 2014. When the 19,672,399 carloads analyzed in 2005 are added to the 2014 carloads a total of 39,899,574 carloads were analyzed to determine the change in shippers' rail rate premium between 2005 and 2014.

Movement characteristics for each record were evaluated to determine the number of interchanges, car type, weight/car, rail territory of origin, destination and all relevant movement parameters so that railroad variable costs could be computed. All movements were run through Escalation Consultants' Optimized Rail Bid Evaluation (ORBE) batch processing program that can analyze the cost for hundreds of thousands of movements utilizing the STB costing program, the Uniform Rail Costing System (URCS) and then summarize moves by commodity and territory. The ORBE calculated the following for each movement:

- Railroad long term variable cost; and,
- The Revenue to Variable Cost Ratio (RVC) (RVC= Revenue ÷ Variable Cost).

The Staggers Rail Act of 1980 set a legislative demarcation for non-competitive rail rates as those rates with an RVC of 180% or greater. The 180% RVC level is referred to as the Jurisdictional Threshold, signifying the STB has no authority over tariff rates of less than 180%. Therefore, ORBE established the non-competitive and competitive status by the RVC for each movement. In this Exhibit, non-competitive movements are defined as those with an RVC of 180% or greater and competitive movements are defined as those with an RVC of less than 180%.

The rate premium for commodities is determined by calculating the average difference between the rate per car above and below a 180% RVC for each commodity in each rail territory and then multiplying this rate difference by the number of cars with RVC's above a 180% RVC for that commodity and territory. The sum of the premium amounts for all territories represents the total rate premium for a commodity. A map showing the location of each rail territory is found at the end of the Appendix.

The most detailed commodities in the Sample are five-digit Standard Transportation Commodity Codes (five-digit STCC's). For example, the Sample contains sixty (60) different five-digit chemical codes which represent all chemicals shipped by rail. The overall amount for chemicals (STCC 28) is the sum of the sixty (60) five-digit chemical codes.

In calculating the cost of non-competitive rates some commodities did not contain any movements with less than a 180% RVC in a rail territory and in other cases the makeup of moves with less than a 180% RVC was substantially different than the makeup of moves with RVC's greater than 180%. In these instances, competitive rail rates were computed based on the jurisdictional threshold of 180%. In these situations, competitive rates were determined by multiplying the railroad's average non-competitive cost per car for a commodity in a territory by 180%. This is a conservative assumption as it assumes that the competitive rates for all movements in a territory are at the absolute highest possible competitive

rate level which is 180% greater than the railroads' variable cost of non-competitive movements. The rate premium represents the difference between rates above and below a 180% RVC for a commodity in a territory so by establishing the competitive rate at the highest level possible the Study minimizes the rate premium when the competitive rate is a calculated amount.

A number of records in this sample were found to contain errors not detected or deemed significant by the STB. These types of moves were eliminated from the Analysis[1].

Railroads are allowed to mask contract revenue either up or down in the Sample which means that rates may be over or understated to the extent that revenue masking occurs in the Sample. To the extent that revenue masking occurs it would apply to the rates for both non-competitive and competitive movements. The cost of non-competitive rates is calculated as the difference between average non-competitive and competitive rates and both types of movements would be impacted by revenue masking so the cost of non-competitive rates should not be materially impacted by any masking of revenue in the Sample.

Waybill data in the Sample have been used by shippers, consultants, railroads and various federal and state governmental agencies in a wide array of cases before the ICC (now the STB), state regulatory

[1] The movements which were eliminated fell into the following categories:

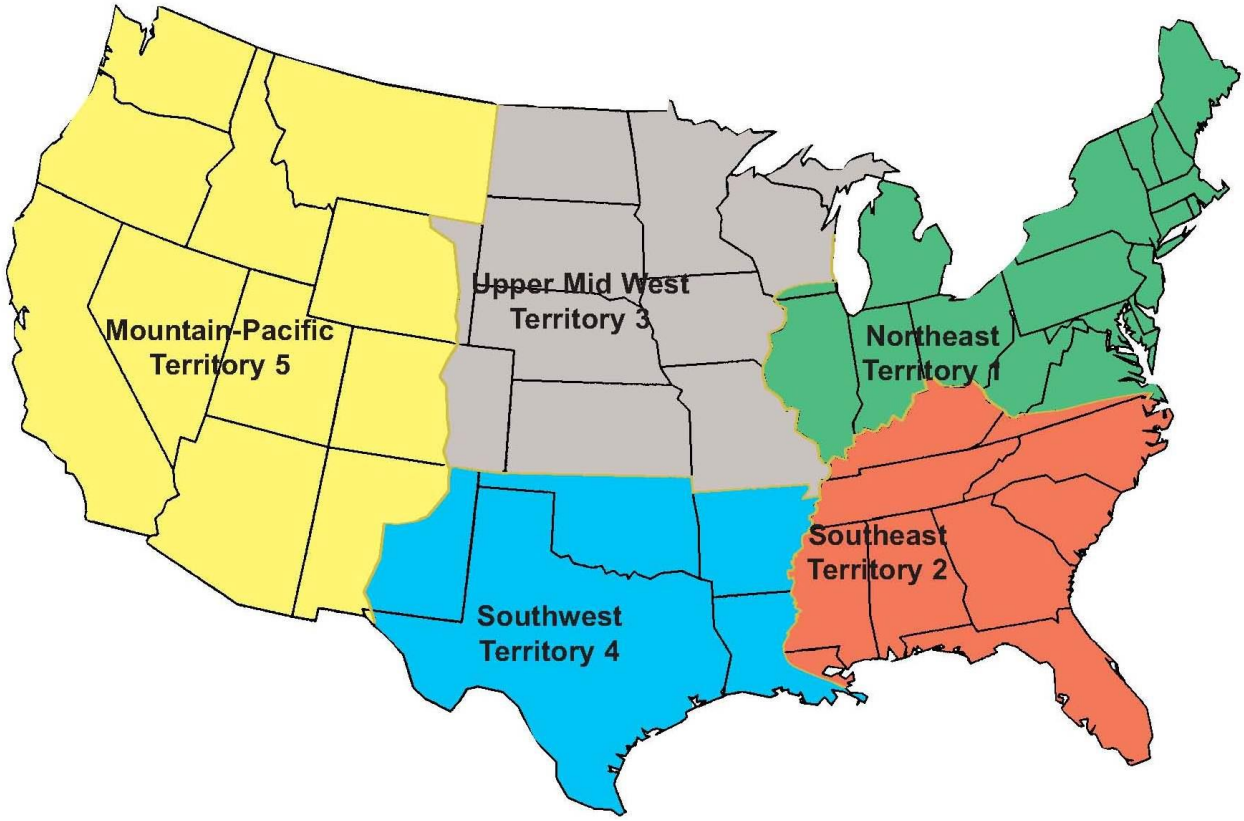
- Laden weights of 130 tons or more per car,
- Laden weights of zero tons per car,
- Rates of zero dollars per car,
- RVC levels of less than 50%,
- Rates of $30,000 or above per car.

Gross track weight limitations are 286,000 lbs. or 143 tons. The tare weight or empty weight of typical railcars range between 26 and 55 tons, adding 130 tons of laden to an empty car will exceed the 143 ton limit. Shipping zero tons, or having a rate of $zero or $30,000 and above per car is deemed an input error; people do not ship commodities without weight, railroads do not tend to ship commodities for free and shippers do not tend to ship commodities at rates at or in excess of $30,000 per car. An RVC level of less than 50% is indicative of an input error in the STB's Waybill regarding the rate or the distance per movement.

bodies and the courts. The rate premium calculations in the Study utilized the Public Use Waybill Sample which contains the most detailed data the STB makes available to the public on rail movements.

Rail Territories

Breakdown of Geographic Area for Each Origin Rail Territory



Note: Territory 0 includes Canadian and Mexican moves.

Appendix 2

Breakdown of Rate Premium by Rail Territory and Five-Digit Commodity Codes

Commodity Specific Data

Farm Products - STCC 01

	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$3,848	178%	14,974	$4,986	235%	32,273	$1,068	57%	$34,477,310
Northeast	$2,474	139%	181,415	$3,684	286%	230,973	$1,179	146%	$272,226,498
Southeast	$2,161	151%	9,554	$3,486	286%	27,640	$1,354	137%	$37,428,699
Upper Midwest	$4,070	154%	250,346	$4,853	225%	488,388	$748	71%	$365,149,779
Southwest	$3,392	167%	14,384	$3,659	262%	114,083	$483	98%	$55,073,851
Mountain Pacific	$4,418	174%	25,972	$5,147	244%	88,476	$1,428	67%	$126,325,494
Average	**$3,442**	**151%**		**$4,432**	**248%**		**$907**	**93%**	
Total			**496,645**			**981,833**			**$890,681,632**
Total US Only			**481,671**			**949,560**			**$856,204,321**

Cost of Non-Competitive Rates Details for Farm Products-STCC 01

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
01131-Barley	12,208	39%	19,206	61%	$10,809,464
01132-Corn Exc. Popcorn	276,214	41%	391,598	59%	$295,795,647
01133-Oats	5,596	30%	13,216	70%	$11,988,843
01134-Rice, Rough	84	5%	1,580	95%	$1,303,498
01135-Rye	816	56%	636	44%	$868,606
01136-Sorghum Grains	7,859	17%	39,142	83%	$19,919,574
01137-Wheat Exc. Buckwheat	88,866	24%	280,871	76%	$238,474,444
01139-Grain	3,724	71%	1,508	29%	$1,388,815
01141-Cottonseeds	5,440	54%	4,664	46%	$5,772,536
01142-Flaxseeds	632	27%	1,740	73%	$2,093,555
01143-Peanuts	600	12%	4,240	88%	$5,094,683
01144-Soybeans	63,533	24%	197,192	76%	$239,866,761
01149-Oil Kernels/Nuts/Seeds Ex. Edible Tree Nuts	3,085	33%	6,318	67%	$5,871,964

Cost of Non-Competitive Rates Details for Farm Products-STCC 01 *(continued)*					
Commodity STCC	**Carloads Below 180% RVC**	**Percent of Total Carloads**	**Carloads Above 180% RVC**	**Percent of Total Carloads**	**Premium**
01151-Lawn Grass Seeds	280	100%	0	0%	$0
01152-Popcorn	280	50%	280	50%	$196,909
01159-Field Seeds, Exc. Seeds	1,440	62%	888	38%	$3,466,182
01191-Fodder/Hay/Roughage Ex. Chopped/Ground	920	52%	840	48%	$722,985
01194-Potatoes, Sweet	0	0%	40	100%	$30,244
01195-Potatoes, Other Than Sweet	3,724	48%	4,000	52%	$18,542,969
01211-Grapefruit	0	0%	80	100%	$330,191
01212-Lemons	0	0%	40	100%	$216,328
01214-Oranges	1,628	47%	1,832	53%	$6,062,653
01221-Apples	1,416	54%	1,204	46%	$1,423,794
01224-Grapes	36	23%	124	78%	$304,016
01226-Peaches	80	45%	96	55%	$657,960
01227-Pears	48	100%	0	0%	$0
01298-Nuts, Edible, in the Shell Ex. Peanuts	0	0%	80	100%	$280,870
01312-Carrots	1,544	58%	1,140	42%	$4,210,063
01313-Onions, Green	2,172	77%	664	23%	$1,712,221
01318-Onions, Dry	400	34%	760	66%	$4,786,736
01331-Broccoli	292	65%	160	35%	$158,856
01334-Celery	396	59%	280	41%	$1,062,140
01335-Lettuce	40	100%	0	0%	$0
01341-Beans Dry Ripe	6,724	70%	2,920	30%	$1,741,915
01342-Peas, Dry	3,888	60%	2,626	40%	$1,685,139
01343-Cowpeas, Lentils or Lupines	2,096	76%	644	24%	$550,053
01398-Cantaloupes, Melons or Muskmelons	504	42%	704	58%	$2,293,745
01915-Herbs (Seeds, Leaves, Roots, Etc.)	0	0%	360	100%	$841,991
01919-Horticultural Specialties	0	0%	40	100%	$8,180
01991-Chopped, Ground or Pulverized Hay, Straw or Related Agricultural Prod.	80	67%	40	33%	$3,211
01992-Chopped, Ground or Pulverized Alfalfa	0	0%	80	100%	$143,890
Total	**496,645**	**34%**	**981,833**	**66%**	**$890,681,632**

Coal-STCC 11

	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$4,522	145%	5,046						
Northeast	$1,582	146%	280,945	$2,667	443%	1,584,791	$1,082	297%	$1,714,465,446
Southeast	$2,025	145%	40,881	$3,159	398%	589,639	$1,134	254%	$668,439,312
Upper Midwest	$2,472	130%	2,142,321	$3,294	228%	907,436	$826	98%	$749,163,190
Southwest[(1)]	$0	0%	0	$3,818	392%	1,800	$2,063	212%	$3,713,376
Mountain Pacific	$2,452	136%	387,400	$3,002	314%	595,998	$553	178%	$329,478,509
Average	**$2,379**	**133%**		**$2,955**	**362%**		**$942**	**222%**	
Total			**2,856,593**			**3,679,664**			**$3,465,259,834**
Total US Only			**2,851,547**			**3,679,664**			**$3,465,259,834**

[(1)] Competitive rates were calculated based on the cost of captive cars.

Cost of Non-Competitive Rates Details for Coal-STCC 11

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
11112-Cleaned of Prepared Anthra (Crushed, Scrnd, Sized)	0	0%	5,108	100%	$18,306,720
11211-Raw Bituminous Coal	291	5%	5,367	95%	$4,255,397
11212-Prepared Bituminous Coal, Exc. Ground or Other than for Fuel	2,855,702	44%	3,667,509	56%	$3,441,996,532
11221-Lignite, Prepared or Raw Ex. Ground/Other than for Fuel/Steam Purposes	600	26%	1,680	74%	$701,185
Total	**2,856,593**	**44%**	**3,679,664**	**56%**	**$3,465,259,834**

Crude Petroleum, Natural Gas or Gasoline-STCC 13									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$8,048	139%	29,538	$11,870	241%	45,463	$3,826	102%	$173,931,753
Northeast	$2,917	160%	6,538	$4,904	284%	31,754	$2,227	137%	$70,710,146
Southeast[1]	$0	0%	0	$4,410	437%	488	$2,195	257%	$1,071,262
Upper Midwest	$5,041	150%	96,623	$7,065	249%	331,294	$2,026	98%	$671,324,098
Southwest	$3,205	150%	8,114	$5,264	305%	18,057	$1,711	150%	$30,895,807
Mountain Pacific	$3,789	180%	600	$5,268	267%	23,407	$1,731	87%	$40,521,740
Average	**$5,461**	**148%**		**$7,229**	**254%**		**$2,194**	**103%**	
Total			**141,413**			**450,463**			**$988,454,807**
Total US Only			**111,875**			**405,000**			**$814,523,054**

[1] Competitive rates were calculated based on the cost of captive cars.

Cost of Non-Competitive Rates Details for Crude Petroleum, Natural Gas or Gasoline-STCC 13					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
13111-Crude Petroleum	137,665	24%	438,075	76%	$956,183,691
13211-Natural Gasoline Exc. Liq. Petroleum	3,748	23%	12,388	77%	$32,271,116
Total	**141,413**	**24%**	**450,463**	**76%**	**$988,454,807**

Nonmetallic Minerals-STCC 14

	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$5,435	124%	15,064	$7,997	290%	1,880	$2,980	152%	$5,602,599
Northeast	$1,475	138%	100,164	$2,634	317%	213,530	$1,284	178%	$274,142,067
Southeast	$801	134%	154,940	$1,456	302%	248,551	$679	164%	$168,700,442
Upper Midwest	$2,750	167%	64,940	$6,423	305%	373,373	$2,026	137%	$756,385,952
Southwest	$1,311	176%	18,002	$1,617	314%	409,526	$424	137%	$173,443,213
Mountain Pacific	$2,510	139%	7,356	$2,474	347%	111,162	$748	204%	$83,173,995
Average	**$1,593**	**143%**		**$3,148**	**312%**		**$1,076**	**154%**	
Total			**360,466**			**1,358,022**			**$1,461,448,268**
Total US Only			**345,402**			**1,356,142**			**$1,455,845,670**

Cost of Non-Competitive Rates Details for Nonmetallic Minerals-STCC 14

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
14111-Dimension Stone, Quarry	0	0%	120	100%	$168,357
14211-Agricultural Limestone, Broken or Crushed	0	0%	800	100%	$1,609,939
14212-Fluxing Limestone or Stone, Broken or Crushed	10,892	96%	476	4%	$5,999
14213-Dolomite, Broken or Crushed	13,960	58%	9,979	42%	$618,509
14219-Broken or Crushed Stone or Riprap	169,389	22%	594,981	78%	$324,325,747
14411-Sand (Aggregate or Ballast) Exc. Abrasive	5,397	19%	23,697	81%	$13,540,371
14412-Gravel (Aggregate or Ballast)	10,540	15%	60,205	85%	$26,714,766
14413-Industrial Sand, Crude, Ground or Pulverized Abrasive	45,628	9%	461,559	91%	$951,156,887
14511-Bentonite, Crude	436	12%	3,068	88%	$4,341,505
14514-Ball or Kaolin Clay, Crude	0	0%	1,040	100%	$1,467,458
14519-Ceramic or Clay Crude	200	15%	1,160	85%	$565,633
14711-Barite, Crude (Heavy Spar/Tiff) Ground/Otherwise Treated	920	8%	10,076	92%	$8,366,740
14712-Fluorspar (Fluorite or Florspar), Crude	76	15%	440	85%	$189,969
14713-Borate, Potash or Soda, Crude	120	14%	720	86%	$1,670,709
14714-Apatite or Phosphate Rock, Clay or Sand	47,365	28%	124,432	72%	$26,310,135
14715-Rock Salt, Crude, Crushed, Lump Exc. Sodium Chloride	12,367	33%	24,875	67%	$26,974,558
14716-Sulphur, Crude, Liquid, Molten or Solid	39,892	59%	27,466	41%	$56,355,924
14911-Anhydrite or Gypsum, Crude	916	25%	2,800	75%	$2,024,300
14913-Native Asphalt or BituMen's	0	0%	1,940	100%	$1,800,285
14914-Pumice or Pumicite	512	24%	1,580	76%	$2,273,193
14915-Pyrophyllite, Soap Stone or Talc, Crude	80	16%	416	84%	$840,967
14916-Natural Abrasives, Flour or Sized Grains, or Powders	256	42%	352	58%	$486,724

Cost of Non-Competitive Rates Details for Nonmetallic Minerals-STCC 14 *(continued)*					
Commodity STCC	**Carloads Below 180% RVC**	**Percent of Total Carloads**	**Carloads Above 180% RVC**	**Percent of Total Carloads**	**Premium**
14917-Peat, Natural	120	100%	0	0%	$0
14918-Diatomaceous Oral Earth, Crude	360	16%	1,960	84%	$1,997,840
14919-Nonmetallic Minerals/Loam/Soil/Topsoil	1,040	21%	3,880	79%	$7,641,754
Total	**360,466**	**21%**	**1,358,022**	**79%**	**$1,461,448,268**

Food or Kindred Products-STCC 20

	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$4,677	150%	23,540	$6,558	235%	45,398	$1,660	82%	$75,370,528
Northeast	$2,748	141%	129,044	$4,567	285%	173,398	$1,870	142%	$324,269,831
Southeast	$3,001	145%	42,768	$5,024	281%	54,288	$2,270	130%	$123,229,578
Upper Midwest	$3,307	145%	250,907	$4,526	234%	264,710	$1,380	90%	$365,183,236
Southwest	$3,758	158%	45,821	$4,515	271%	89,011	$937	111%	$83,447,375
Mountain Pacific	$6,882	150%	64,596	$8,453	249%	76,504	$2,479	88%	$189,686,580
Average	**$3,664**	**146%**		**$5,132**	**257%**		**$1,651**	**108%**	
Total			**556,676**			**703,309**			**$1,161,187,129**
Total US Only			**533,136**			**657,911**			**$1,085,816,600**

Cost of Non-Competitive Rates Details for Food or Kindred Products-STCC 20

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
20121-Carcasses Fabricated or Meat/Fresh Frozen	680	85%	120	15%	$111,035
20129-Meat, Fresh Frozen	5,116	60%	3,360	40%	$7,759,086
20131-Lard	520	42%	720	58%	$949,504
20139-Meat Prod.	3,880	40%	5,760	60%	$5,103,894
20141-Hides, Not Tanned/Cattle/Horse/Mule/Sheep/Swine	160	100%	0	0%	$0
20143-Grease or Inedibl/Other Inedible Animal Oil Mill Prod.	11,760	47%	13,488	53%	$10,970,069
20144-Animal Refuse,Tankage,Meat Meal,Drie	6,880	52%	6,240	48%	$8,211,314
20149-Animal By-Prod.	1,000	54%	840	46%	$543,414
20158-Poultry or Small Game By-Prod., Fresh or Chilled	80	29%	200	71%	$263,747
20161-Dressed Poultry or Small Game, Fresh Frozen	3,280	80%	836	20%	$1,451,436
20211-Creamery Butter	1,004	42%	1,384	58%	$1,849,318
20231-Dry Milk Prod.	480	60%	320	40%	$333,616
20233-Evaporated or Condensed Milk Prod.	0	0%	720	100%	$4,307,826
20251-Cheese Exc. Cottage Cheese	1,400	32%	2,956	68%	$10,807,734
20259-Special Dairy Prod. By-Prod.	320	53%	280	47%	$154,262
20262-Packaged Glass or Fluid Milk, Skim Milk or Cream	372	100%	0	0%	$0
20331-Canned Fruits	40	33%	80	67%	$325,602
20332-Canned Vegetables	1,840	49%	1,928	51%	$4,753,246
20334-Juice, Fruit or Vegetable, Other Than Frozen Exc. Cider	8,800	74%	3,080	26%	$17,176,351
20336-Catsup or Other Tomato Sauces	12,520	67%	6,120	33%	$13,936,467
20339-Canned Fruits or Vegetables	440	73%	160	27%	$230,374
20341-Dehydrated or Dried Fruits	72	64%	40	36%	$16,988

Cost of Non-Competitive Rates Details for Food or Kindred Products-STCC 20 *(continued)*					
Commodity STCC	**Carloads Below 180% RVC**	**Percent of Total Carloads**	**Carloads Above 180% RVC**	**Percent of Total Carloads**	**Premium**
20342-Dehydrated or Dried Tables, or Soup Mixes	40	100%	0	0%	$0
20352-Pickles or Other Pickled Prod.	240	18%	1,120	82%	$6,469,993
20352-Pickles or Other Pickled Products	0	0%	280	100%	$1,398,886
20359-Sauces or Seasonings, Exc. Catsup or Tomato Sauces	80	13%	520	87%	$587,220
20361-Frozen Processed (Packaged) Fish or Other Seafood	480	86%	80	14%	$48,281
20371-Frozen Fruits	800	61%	520	39%	$1,190,198
20372-Frozen Juices or Ades	80	40%	120	60%	$66,034
20373-Frozen Vegetables	6,960	29%	16,676	71%	$73,650,181
20379-Frozen Fruits or Vegetables In Mixed Loads	0	0%	80	100%	$231,538
20391-Mixed Loads of Canned/Preserved Fruits/Vegetables	3,240	75%	1,080	25%	$4,859,908
20411-Wheat Flour Exc. Blended or Prepared	25,820	45%	31,464	55%	$27,642,975
20412-Wheat Bran, Middlings Shorts	3,116	45%	3,848	55%	$2,892,849
20413-Corn Meal or Flour Exc. Animal or Poultry Feed	7,080	61%	4,480	39%	$6,456,333
20414-Rye Flour or Meal	40	20%	160	80%	$90,972
20416-Oat Meal or Flour	1,600	54%	1,360	46%	$2,033,304
20418-Grain Mill By-Prod. Ex. Wheat Bran/Middlings/Red Dog	1,392	65%	756	35%	$571,548
20419-Flour or Other Grain Prod.	14,596	48%	15,552	52%	$24,929,836
20421-Prepared Feed Other than Dog/Cat/Other Pet Food	32,240	36%	58,521	64%	$66,682,579
20431-Cooked Cereals, Flaked, Granulated, Popped, Puffed, Rolled, Roasted or Shredded	80	100%	0	0%	$0
20441-Rice, Cleaned	5,180	41%	7,392	59%	$11,446,625
20442-Rice Flour, Bran or Meal	240	17%	1,200	83%	$2,470,951
20443-Brewers Rice	1,920	28%	4,960	72%	$6,960,366
20449-Milled Rice or By-Prod.	40	5%	840	95%	$1,410,830
20461-Corn Syrup	55,799	46%	65,277	54%	$136,618,412
20462-Corn Starch	11,604	46%	13,660	54%	$31,484,978
20463-Corn Sugar	680	28%	1,760	72%	$3,113,980
20465-Corn Oil	9,820	60%	6,532	40%	$5,764,814
20466-Starch Exc. Corn	316	38%	520	62%	$723,286
20467-Wet Process Corn or Mill By-Prod.	5,152	29%	12,848	71%	$5,154,096
20469-Wet Process Corn Milling or Similar Mill	3,920	63%	2,288	37%	$2,444,920
20471-Dog, Cat or Other Pet Food, Exc. Canned	760	43%	1,000	57%	$3,880,739
20472-Canned Dog, Cat or Other Pet Food	40	50%	40	50%	$230,759
20511-Bread or Other Bakery Prod. Exc. Biscuits, Crackers	1,832	64%	1,040	36%	$1,043,030
20616-Sugar Molasses Exc. Blackstrap	720	13%	4,808	87%	$4,573,029
20617-Blackstrap Molasses	3,672	41%	5,300	59%	$7,547,742
20619-Sugar Mill Prod. or By-Prod.	4,436	70%	1,936	30%	$1,297,781
20621-Sugar, Granulated/Powdered, Sugar Cubes or Tablets	16,244	29%	40,732	71%	$110,918,779
20622-Sugar, Liquid or Syrup	0	0%	240	100%	$259,225

Cost of Non-Competitive Rates Details for Food or Kindred Products-STCC 20 *(continued)*					
Commodity STCC	**Carloads Below 180% RVC**	**Percent of Total Carloads**	**Carloads Above 180% RVC**	**Percent of Total Carloads**	**Premium**
20625-Sugar Refining By-Prod.	880	25%	2,600	75%	$2,035,478
20821-Beer/Ale/Porter/Stout/Other Fermented Malt Liquors	16,480	30%	38,320	70%	$62,681,345
20823-Malt Extracts or Brewers Spent Grains	2,232	15%	12,683	85%	$13,682,293
20831-Malt	18,916	49%	19,836	51%	$61,277,006
20832-Malt Flour or Sprouts	400	100%	0	0%	$0
20841-Wine, Brandy or Brandy Spirits or Fruit Spirits	18,576	80%	4,532	20%	$14,329,031
20851-Distilled, Rectified or Blended Liquors	808	18%	3,644	82%	$7,892,076
20859-By-Prod. Of Liquor Distilling	29,357	36%	52,829	64%	$124,351,558
20861-Soft Drinks/Mineral Waters/Bottled/in Bulk Ex. Drinking Waters	0	0%	168	100%	$17,536
20871-Misc. Flavoring Extracts, Syrups or Compounds	120	17%	600	83%	$2,572,567
20911-Cottonseed Oil, Crude or Refined Exc. Edible Oils	1,276	40%	1,884	60%	$2,189,039
20914-Cottonseed Cake or Meal or By-Prod.	1,076	44%	1,380	56%	$1,245,136
20915-Cotton Linters or Regins	584	57%	444	43%	$262,506
20921-Soybean Oil, Crude or Refined Exc. Edible Oils	31,304	50%	31,160	50%	$25,039,305
20923-Soybean Cake/Flour/Grits/Meal/Other By-Prod.	99,280	51%	96,532	49%	$99,061,581
20931-Linseed Oil, Crude or Refined Exc. Edible Oils	396	62%	240	38%	$159,669
20933-Nut or Vegetable Oils Exc. Corn	28,492	47%	32,484	53%	$31,461,316
20939-Nut or Vegetable Oil Cake or Meal or Other By-Prod.	19,356	33%	39,151	67%	$44,262,158
20941-Marine Oil Mill Prod.	0	0%	120	100%	$89,659
20942-Marine Oil Mill By-Prod. Viz. Meal, Scrap or Tankage	160	40%	240	60%	$642,261
20961-Shortening or Cooking or Salad Oils Exc. Corn Oil	120	33%	240	67%	$194,780
20993-Sweetening Syrups or Molasses	160	24%	520	76%	$2,109,844
20995-Mixed Loads of Food or Kindred Prod.	5,560	49%	5,880	51%	$18,928,143
20999-Food Preparations or By-Prod.	240	55%	200	45%	$300,581
Total	**556,676**	**44%**	**703,309**	**56%**	**$1,161,187,129**

Pulp, Paper or Allied Products-STCC 26									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$6,698	142%	28,480	$8,982	249%	36,720	$2,485	105%	$91,250,244
Northeast	$3,285	136%	22,200	$5,624	283%	35,516	$2,365	146%	$84,012,989
Southeast	$3,669	139%	81,796	$5,770	277%	133,108	$2,099	139%	$279,350,509
Upper Midwest	$3,758	148%	14,440	$6,633	301%	26,188	$3,083	143%	$80,736,987
Southwest	$4,611	147%	23,680	$6,727	259%	65,760	$2,067	111%	$135,925,128
Mountain Pacific	$5,381	162%	9,496	$6,126	267%	23,852	$1,839	93%	$43,858,160
Average	**$4,322**	**142%**		**$6,414**	**272%**		**$2,227**	**127%**	
Total			**180,092**			**321,144**			**$715,134,017**
Total US Only			**151,612**			**284,424**			**$623,883,773**

Cost of Non-Competitive Rates Details for Pulp, Paper or Allied Products-STCC 26					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
26111-Pulp	44,252	43%	58,844	57%	$93,342,821
26112-Pulp Mill By-Products	2,000	29%	4,840	71%	$13,053,083
26211-Newsprint	8,320	41%	11,800	59%	$26,284,580
26212-Ground Wood Paper, Uncoated	7,760	41%	11,120	59%	$17,777,792
26213-Printing Paper/Coated/Uncoated/Coated Grnd Wood Paper	27,720	43%	36,960	57%	$131,751,437
26214-Wrapping Paper, or Coarse Paper	1,640	47%	1,840	53%	$7,937,695
26217-Special Industrial Paper or Paper Car Liners	1,240	57%	920	43%	$2,062,275
26218-Sanitary Tissue Stock	80	100%	0	0%	$0
26219-Paper, Exc. Building Paper	0	0%	40	100%	$14,341
26311-Fibreboard/Paperboard Pulp Board Ex. Bldg Insulating Board	87,000	31%	194,540	69%	$422,319,734
26431-Paper Bags	0	0%	80	100%	$44,694
26613-Wallboard Exc. Hardboard	0	0%	80	100%	$308,813
26619-Building Paper or Building Board	80	50%	80	50%	$236,753
Total	**180,092**	**36%**	**321,144**	**64%**	**$715,134,017**

Chemicals or Allied Products-STCC 28									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$4,380	136%	91,246	$7,200	294%	131,413	$2,762	149%	$362,928,998
Northeast	$2,958	144%	86,155	$5,810	444%	370,209	$3,067	294%	$1,135,531,904
Southeast	$2,712	150%	57,727	$5,602	440%	479,608	$2,970	285%	$1,424,394,241
Upper Midwest	$3,007	145%	52,410	$4,785	282%	319,825	$2,601	147%	$831,846,374
Southwest	$2,223	135%	123,426	$5,294	359%	478,435	$2,651	216%	$1,268,439,031
Mountain Pacific	$4,174	158%	29,067	$6,321	375%	201,116	$2,779	216%	$558,932,197
Average	**$3,101**	**142%**		**$5,613**	**379%**		**$2,818**	**232%**	
Total			**440,031**			**1,980,606**			**$5,582,072,745**
Total US Only			**348,785**			**1,849,193**			**$5,219,143,746**

Cost of Non-Competitive Rates Details for Chemicals or Allied Products-STCC 28					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
28121-Inorganic Bleaching Compounds, Exc. Chlorine	880	16%	4,680	84%	$9,690,960
28122-Sodium Alkalies Sodium Compounds	7,040	10%	66,960	90%	$114,926,232
28123-Sodium Compounds, Exc. Sodium Alkalies	21,615	14%	130,655	86%	$327,940,578
28124-Potassium Alkalies	880	8%	9,800	92%	$21,400,422
28125-Potassium Compounds, Exc. Potassium Alkalies	40,186	30%	94,226	70%	$159,119,491
28126-Barium/Calcium/Magnesium/Strontium Comps Ex. Bleaches	2,720	13%	18,716	87%	$36,578,782
28128-Chlorine	1,200	3%	35,800	97%	$255,525,316
28133-Carbon Dioxide	480	4%	11,324	96%	$20,307,741
28134-Elemental Gases	0	0%	1,760	100%	$7,000,194
28139-Industrial Gases, (Compressed, Solid or Liquefied)	8,680	26%	24,712	74%	$64,883,146
28141-Crude Prod. from Coal Tar/Natural Gas/Petroleum	1,836	9%	17,744	91%	$64,934,222
28151-Cyclic Intermed Benzene/Toluene/Other Cyclic Chem. Prod.	3,560	7%	46,596	93%	$144,004,779
28152-Cyclic Intermed Benzene/Toluene/Naphthalene/Other Cyclic Chemical Prod.	80	4%	2,200	96%	$6,380,486
28156-Organic Dyes	0	0%	120	100%	$427,658
28161-Titanium Pigments	160	4%	4,200	96%	$25,170,316
28163-Zinc Pigments	640	94%	40	6%	$224,390
28169-Inorganic Pigments, Exc. Blacks or Organic Color Pigments	0	0%	512	100%	$1,802,524
28180-Misc. Acyclic Organic Chemical, Exc. Organic Dyes	1,080	15%	6,360	85%	$35,033,917
28181-Misc. Acyclic Organic Chemical, Exc. Organic Dyes	11,707	12%	86,148	88%	$208,432,090
28182-Misc. Acyclic Organic Chemical, Exc. Organic Dyes	2,080	9%	21,920	91%	$88,550,511

Cost of Non-Competitive Rates Details for Chemicals or Allied Products-STCC 28 *(continued)*					
Commodity STCC	**Carloads Below 180% RVC**	**Percent of Total Carloads**	**Carloads Above 180% RVC**	**Percent of Total Carloads**	**Premium**
28183-Misc. Cyclic Chemical Prod.	6,184	24%	19,204	76%	$36,764,435
28184-Alcohols	79,449	18%	356,518	82%	$850,869,055
28185-Glycols or Glycerines	12,432	26%	34,652	74%	$139,847,184
28186-Organic Acids or Salts, Exc. Acid Dyes	2,680	5%	49,968	95%	$161,188,595
28187-Misc. Acyclic Inorganic Prod., Exc. Organic Dyes	0	0%	400	100%	$1,345,622
28188-Chemical Warfare Gases	0	0%	200	100%	$2,191,759
28189-Ind. Organic Chemicals, Exc. Grain Alcohol for Beverage	640	8%	7,800	92%	$32,449,785
28190-Industrial Inorganic Chemicals	0	0%	160	100%	$451,992
28191-Ammonia/Ammonium Compds., Ex. Anhydrous Ammonia	4,200	18%	19,759	82%	$41,337,835
28192-Nitric Acid	0	0%	1,040	100%	$2,877,779
28193-Sulphuric Acid	17,528	20%	71,657	80%	$163,249,217
28194-Industrial Inorganic Acids, Exc. Nitric	4,876	10%	44,824	90%	$134,346,217
28195-Cobalt/Copper/Iron/Nickel or Zinc Compounds	880	10%	7,756	90%	$19,175,994
28196-Aluminum Compounds	80	6%	1,320	94%	$4,184,867
28197-Radio-Active or Nuclear Chemicals	0	0%	1,236	100%	$8,333,213
28198-Anhydrous Ammonia	440	1%	30,900	99%	$178,117,407
28199-Industrial Inorganic Chemicals	3,100	10%	26,476	90%	$81,849,603
28211-Plastic Materials, Exc. Fabricated Plastic Prod.	134,428	24%	426,034	76%	$1,417,917,304
28212-Synthetic Rubbers Vulcanizable Elastomers	1,088	12%	8,168	88%	$21,407,895
28311-Drugs For Human Use	11,032	71%	4,474	29%	$2,323,787
28419-Soap or Other Detergents, Exc. Shampoos or Shaving Prod.	280	15%	1,560	85%	$3,604,559
28431-Surface Active or Agents, Sulfonated Oils or Assistants	560	7%	7,880	93%	$12,474,346
28441-Cosmetics, Perfumes or Other Toilet Exc. Essential Oils	0	0%	40	100%	$32,705
28512-Paint Oils/Solvents/Thinners/Paint Drying Ingredients	80	4%	1,840	96%	$9,255,431
28519-Paints/Enamels/Lacquers/Shellacs/Varnishes	0	0%	120	100%	$697,189
28612-Gum/Wood Chemicals	2,520	30%	5,800	70%	$13,574,362
28712-Super Phosphate	12,635	13%	82,831	87%	$147,521,036
28713-Ammoniating Fertilizer Solution	6,155	10%	54,636	90%	$99,440,392
28714-Misc. Fertilizer Compounds	6,620	23%	22,020	77%	$85,760,835
28719-Fertilizers Ex. Milled/Mined/Otherwise Prepared Ntrl Boron	40	20%	160	80%	$234,740
28799-Agricultural Chemicals	116	3%	3,760	97%	$15,719,025
28911-Adhesives, Cements, Glues, Sizes, Calking Compounds or Sealants Exc. Asbestos Cement	0	0%	80	100%	$274,535
28921-Explosives Exc. Ammunition, Fireworks or Technics	120	60%	80	40%	$491,941
28931-Printing Ink	0	0%	80	100%	$405,626
28991-Salt, Common	10,408	39%	16,308	61%	$21,709,984
28994-Fatty Acids	4,180	12%	29,612	88%	$53,659,258
28995-Water Treating Compounds	0	0%	320	100%	$1,774,894
28996-Blacks	160	1%	15,000	99%	$79,377,322
28997-Misc. Chemical Compounds, Exc. Sealants	1,000	8%	12,212	92%	$39,725,878

Cost of Non-Competitive Rates Details for Chemicals or Allied Products-STCC 28 *(continued)*					
Commodity STCC	**Carloads Below 180% RVC**	**Percent of Total Carloads**	**Carloads Above 180% RVC**	**Percent of Total Carloads**	**Premium**
28998-Misc. Chemical Compounds, Exc. Sealants	10,416	30%	24,288	70%	$93,743,228
28999-Chemical Prod., Exc. Sealants	880	15%	4,960	85%	$10,032,161
Total	**440,031**	**18%**	**1,980,606**	**82%**	**$5,582,072,745**

Petroleum or Coal Products-STCC 29

	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$4,948	144%	25,752	$7,000	279%	55,180	$2,102	134%	$115,971,790
Northeast	$2,518	133%	34,189	$4,360	392%	173,930	$1,860	244%	$323,487,620
Southeast	$3,048	141%	9,760	$5,462	417%	38,198	$2,335	274%	$89,188,629
Upper Midwest	$4,344	161%	17,122	$5,276	264%	71,446	$1,132	100%	$80,890,936
Southwest	$3,022	157%	20,328	$3,801	318%	157,126	$1,365	152%	$214,482,822
Mountain Pacific	$3,300	171%	22,936	$4,847	303%	91,112	$1,939	140%	$176,696,515
Average	**$3,496**	**150%**		**$4,718**	**334%**		**$1,705**	**177%**	
Total			**130,087**			**586,992**			**$1,000,718,313**
Total US Only			**104,335**			**531,812**			**$884,746,523**

Cost of Non-Competitive Rates Details for Petroleum or Coal Products-STCC 29

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
29111-Gasoline or Jet or High Volatile Petroleum Fuels	14,480	61%	9,128	39%	$13,743,163
29112-Kerosene Ex. Jet Fuels	40	100%	0	0%	$0
29113-Distillate Fuel Oil	3,660	20%	14,892	80%	$16,573,187
29114-Petroleum Lubricating or Similar Oils, Compounds	13,680	25%	40,892	75%	$96,303,531
29116-Asphalt Pitches/Tars, from Petroleum/Coal Coke Oven/Natural Gas	13,804	20%	56,844	80%	$74,016,592
29117-Petroleum Residual Fuel Oils/Other Low Volatile Petroleum Fuels	16,476	24%	52,824	76%	$98,527,017
29119-Petroleum Refining Products	10,808	23%	35,184	77%	$83,391,494
29121-Liquefied Gases, Coal or Petroleum	36,764	16%	197,820	84%	$446,756,062
29521-Asphalt or Tar Saturated Felts, Boards or Roofing	40	100%	0	0%	$0
29522-Asphalt/Tar Cements Coatings/Roofing Cements	76	40%	116	60%	$361,643
29523-Asphalt Sheathings, Shingles or Sidings	5,580	54%	4,776	46%	$7,075,073
29529-Asphalt Coatings or Felts	320	33%	640	67%	$247,800
29912-Lubricants or Similar Compounds	1,160	17%	5,560	83%	$7,021,530
29913-Petroleum Coke	5,602	6%	93,896	94%	$114,103,152
29914-Coke Produced from Coal	7,205	9%	72,776	91%	$34,461,969
29919-Coal or Petroleum Products	392	19%	1,644	81%	$8,136,101
Total	**130,087**	**18%**	**586,992**	**82%**	**$1,000,718,313**

Clay, Concrete, Glass or Stone Products-STCC 32									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$3,303	163%	4,440	$5,518	283%	15,240	$1,795	109%	$27,354,845
Northeast	$2,726	152%	13,016	$3,992	335%	72,373	$1,524	182%	$110,314,625
Southeast	$2,788	140%	15,980	$5,859	326%	123,708	$2,615	182%	$323,528,430
Upper Midwest	$2,613	169%	21,776	$4,471	282%	63,103	$1,987	113%	$125,400,799
Southwest	$2,996	166%	5,296	$3,685	363%	67,620	$1,377	186%	$93,096,840
Mountain Pacific	$4,457	164%	16,524	$4,044	289%	91,972	$873	119%	$80,321,344
Average	**$3,130**	**159%**		**$4,611**	**317%**		**$1,751**	**157%**	
Total			**77,032**			**434,016**			**$760,016,883**
Total US Only			**72,592**			**418,776**			**$732,662,038**

Cost of Non-Competitive Rates Details for Clay, Concrete, Glass or Stone Products-STCC 32					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
32119-Flat Glass	0	0%	40	100%	$138,378
32293-Glass Fibre	40	100%	0	0%	$0
32299-Glass or Glassware, or Pressed	2,920	41%	4,240	59%	$5,559,029
32411-Hydraulic Cement, Natural, Portland or Masonry	26,200	13%	181,119	87%	$203,671,035
32412-Ready-Mix Cement or Concrete, Dry	80	25%	240	75%	$712,779
32511-Brick or Blocks, Clay or Shale	1,240	43%	1,640	57%	$2,775,283
32531-Ceramic, Enamel, Promenade or Quarry or Wall Tile	360	50%	360	50%	$1,287,400
32551-Clay Refractories	120	60%	80	40%	$56,827
32552-Nonclay Refractories Dead Burned Magnesia or Magnesite	240	86%	40	14%	$21,773
32711-Concrete Brick or Blocks	284	88%	40	12%	$3,417
32715-Concrete Structural Shapes, Reinforced	0	0%	596	100%	$2,551,202
32719-Concrete Products	1,892	41%	2,676	59%	$5,664,333
32741-Lime or Lime Plaster	5,264	11%	41,228	89%	$61,802,536
32752-Gypsum Plaster	360	17%	1,760	83%	$3,741,203
32754-Gypsum Wallboard	8,480	27%	23,320	73%	$32,828,250
32759-Gypsum Products Exc. Gypsum Building	196	4%	4,681	96%	$5,387,305
32819-Clay Stone or Stone Products	0	0%	236	100%	$58,146
32911-Nonmetallic Artificial Abrasives, Flour Abrasives	80	33%	160	67%	$95,765
32951-Vermiculite, Exfoliated, Loose	0	0%	80	100%	$251,452
32952-Light Wght Aggregates/Clays or Slags/Ground Treated in Any Other Manner	19,644	19%	81,596	81%	$234,331,855
32953-Magnesite or Magnesia/Calcined/Dead Burned/Ground	480	57%	360	43%	$1,148,138

Cost of Non-Competitive Rates Details for Clay, Concrete, Glass or Stone Prod.-STCC 32 *(continued)*					
Commodity STCC	**Carloads Below 180% RVC**	**Percent of Total Carloads**	**Carloads Above 180% RVC**	**Percent of Total Carloads**	**Premium**
32954-Pyrophillite, Steatite or Talc, Ground or Otherwise Treated	600	23%	1,960	77%	$5,388,833
32955-Feldspar, Ground or Otherwise Treated	40	6%	680	94%	$1,772,270
32957-Mica, Ground or Treated	0	0%	160	100%	$501,758
32959-Nonmetallic Mnls or Earths, Ground or in Any Other Manner	8,512	9%	86,724	91%	$190,267,916
Total	**77,032**	**15%**	**434,016**	**85%**	**$760,016,883**

Primary Metal Products, Including Galvanized Coating or Other Allied Processing-STCC 33									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$6,026	153%	10,720	$8,660	286%	34,560	$3,090	119%	$106,782,606
Northeast	$2,710	133%	62,305	$4,547	346%	262,259	$1,496	202%	$392,334,270
Southeast	$4,351	151%	32,104	$6,625	292%	98,536	$2,076	141%	$204,513,611
Upper Midwest	$4,206	168%	7,340	$5,813	290%	38,812	$1,359	131%	$52,739,744
Southwest	$4,976	166%	12,236	$6,368	299%	49,360	$1,099	130%	$54,239,089
Mountain Pacific	$3,667	167%	20,019	$4,856	280%	38,095	$1,486	111%	$56,592,997
Average	**$3,720**	**147%**		**$5,501**	**318%**		**$1,663**	**166%**	
Total			**144,724**			**521,622**			**$867,202,318**
Total US Only			**134,004**			**487,062**			**$760,419,712**

Cost of Non-Competitive Rates Details for Primary Metal Products, Including Galvanized Coating or Other Allied Processing-STCC 33					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
33111-Pig Iron	2,480	16%	13,411	84%	$27,153,199
33115-Metallizing Plant Products	520	54%	444	46%	$734,506
33119-Blast Furnace/Open Hearth/Rolling Mill/Coke Oven Prod.	40	4%	960	96%	$1,675,869
33121-Steel Ingot or Semi-Finished Shapes	34,128	34%	67,654	66%	$124,544,444
33122-Iron or Steel Plates	8,760	20%	35,328	80%	$73,833,687
33123-Iron or Steel Sheet or Strip	64,860	21%	239,391	79%	$293,727,897
33124-Iron or Steel Bars, Bar Shapes or Rods	5,360	12%	38,532	88%	$103,447,044
33125-Structural Shapes or Piling, Steel Mill Products	5,360	22%	19,388	78%	$37,973,415
33126-Iron or Steel Pipe, or Fittings	5,612	9%	58,666	91%	$76,415,409
33127-Tin Mill Products	400	9%	3,920	91%	$9,001,289
33128-Railway Track Material Viz. Rails/Joint Bars/Related Prod.	1,592	16%	8,472	84%	$16,196,392
33129-Primary Iron or Steel Products	40	100%	0	0%	$0
33131-Ferromanganese	160	57%	120	43%	$338,765
33132-Ferrochrome	40	50%	40	50%	$302,560
33133-Ferrosilicon	120	43%	160	57%	$298,445
33134-Additive Alloys Exc. Copper	40	50%	40	50%	$99,920
33135-Electrometallurgical Products	160	11%	1,344	89%	$2,515,404
33151-Noninsulated Ferrous Rope, Cable or Strand	0	0%	160	100%	$980,225
33152-Steel Nails/Staples/Tacks/Brads/Spikes Ex. Railway Spikes	0	0%	40	100%	$12,426
33155-Steel Wire Exc. Fabricated Wire Products	440	38%	720	62%	$1,317,927
33211-Iron or Steel Cast Pipe or Fittings	240	18%	1,076	82%	$4,274,932

Cost of Non-Competitive Rates Details for Primary Metal Products, Including Galvanized Coating or Other Allied Processing-STCC 33 *(continued)*

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
33219-Iron or Steel Castings	0	0%	120	100%	$632,976
33311-Primary Copper or Copper Base Alloy Pig/Slab/Ingots	2,396	25%	7,320	75%	$21,815,211
33321-Lead Pig, Slab, Ingots Bullion Exc. Solder, Bitt or Type Metal	600	34%	1,160	66%	$2,933,997
33331-Zinc Smelter Products, Viz. Spelter/Pig Slab/Ingots	3,720	58%	2,720	42%	$4,389,453
33332-Zinc Dross, Residues, Ashes	160	9%	1,568	91%	$5,274,859
33341-Primary Aluminum Blooms, Pig, Slab or Ingots	5,760	33%	11,956	67%	$33,627,552
33342-Aluminum Residues	160	100%	0	0%	$0
33511-Copper, Brass or Bronze or Other Copper Base Alloy Rods or Bars	0	0%	80	100%	$241,787
33521-Aluminum or Aluminum Alloy Plate or Sheet	600	15%	3,360	85%	$13,378,259
33523-Aluminum or Aluminum Alloy Rods or Bars	0	0%	1,432	100%	$6,407,818
33529-Aluminum/Aluminum Alloy Basic Shapes, /Exc. Aluminum Foil	216	84%	40	16%	$19,465
33911-Iron or Steel Forgings	40	50%	40	50%	$66,575
33991-Metal Powder, Flakes or Paste	0	0%	40	100%	$47,808
33999-Primary Metal Products	720	27%	1,920	73%	$3,522,800
Total	**144,724**	**22%**	**521,622**	**78%**	**$867,202,318**

Transportation Equipment-STCC 37

	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	$2,408	157%	46,276	$2,959	262%	31,040	$713	88%	$22,134,255
Northeast	$2,746	129%	428,928	$4,385	254%	295,636	$1,663	117%	$491,518,071
Southeast	$2,777	117%	198,568	$4,768	294%	110,685	$2,349	176%	$259,993,497
Upper Midwest	$3,868	136%	209,558	$5,185	241%	146,861	$1,504	103%	$220,912,974
Southwest	$2,923	133%	205,518	$3,787	249%	184,173	$1,044	109%	$192,251,566
Mountain Pacific	$4,562	137%	78,288	$5,544	243%	41,997	$1,270	106%	$53,345,906
Average	**$3,092**	**130%**		**$4,452**	**255%**		**$1,530**	**119%**	
Total			**1,167,136**			**810,392**			**$1,240,156,269**
Total US Only			**1,120,860**			**779,352**			**$1,218,022,014**

Cost of Non-Competitive Rates Details for Transportation Equipment-STCC 37

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
37111-Motor Passenger or Air Cars, Assembled	719,920	64%	396,360	36%	$683,454,968
37112-Motor Trucks or Truck Tractors, Assembled	295,724	63%	170,800	37%	$214,797,196
37114-Motor Combat Vehicles	0	0%	188	100%	$907,136
37119-Motor Vehicles, NEC, or Golf Carts	440	36%	787	64%	$3,752,082
37142-Motor Vehicle	1,680	95%	80	5%	$281,871
37143-Motor Vehicle Frames	1,000	4%	25,360	96%	$76,867,985
37144-Motor Car Internal Combustion Engines or Parts	1,080	38%	1,760	62%	$2,569,314
37147-Motor Vehicle Body Parts	8,760	100%	0	0%	$0
37149-Motor Vehicle or Parts, NEC, Including Mixed Loads	21,280	25%	62,280	75%	$128,669,015
37299-Aircraft Parts, NEC, or Auxiliary Equipment	40	1%	2,824	99%	$26,733,777
37411-Locomotives or Tenders	36	31%	80	69%	$1,450,624
37413-Parts for Locomotives, All Types	0	0%	40	100%	$743,861
37421-Passenger Train Cars	0	0%	832	100%	$5,313,351
37422-Freight Train Cars	116,456	45%	144,153	55%	$83,560,418
37426-Railroad Car Wheels Parts or Access. for Railroad or Street Cars	600	19%	2,608	81%	$4,662,200
37428-Parts or Access. for Railroad/Street Cars Ex. Wheels	80	13%	560	88%	$1,161,853
37429-Parts or Access. for Railroad or Street Cars Ex. Wheels	40	33%	80	67%	$8,642
37691-Guided Missile/Space Vehicle Parts or Auxiliary Equip.	0	0%	40	100%	$334,036
37999-Transportation Parts or Accessories	0	0%	1,560	100%	$4,887,941
Total	**1,167,136**	**59%**	**810,392**	**41%**	**$1,240,156,269**

Support for Change in Carload Premium Between 2005 and 2014				
STCC	**Description**	**2005 Premium Carloads**	**2014 Premium Carloads**	**Percent Change in Premium Cars**
01	Farm Products	706,299	1,980,606	180.4%
10	Metallic Ores	466,164	3,679,664	689.3%
11	Coal	3,494,647	1,358,022	-61.1%
13	Crude Petro, Nat Gas & Natural Gas	6,052	810,392	13290.5%
14	Nonmetallic Minerals Except Fuels	714,576	703,309	-1.6%
19	Ordinance & Accessories	1,588	586,992	36864.2%
20	Food & Kindred Products	362,676	450,463	24.2%
24	Lumber or Wood Products	213,240	521,622	144.6%
26	Pulp, Paper or Allied Products	287,124	434,016	51.2%
28	Chemicals or Allied Products	1,387,530	321,144	-76.9%
29	Petroleum or Coal Products	447,718	255,412	-43.0%
32	Clay, Concrete, Glass or Stone Products	368,190	558,069	51.6%
33	Primary Metal Products	345,767	14,491	-95.8%
35	Machinery Exc. Electrical	2,237	17,574	685.6%
37	Transportation Equipment	201,221	1,523	-99.2%
40	Waste or Scrap Materials	243,508	1,040	-99.6%
41	Miscellaneous Freight Shipments	8,756	480	-94.5%
	Total	**9,276,985**	**12,988,310**	**40.0%**

Note: Commodities with a small number of carloads are excluded from the table.
This included STCC's 22, 30, 34, 36, 42 and 48.

2014 Breakdown of the Cost of Non-Competitive Rates by 2 Digit STCC's

Origins

Commodity STCC	Avg. Comp Rate	Comp Cars	Percent of Comp Cars	Avg. Captive Rate	Captive Cars	Percent of Captive Cars	Rate Diff per Car	Cost of Non-Competitive Rates
01 *	$3,525	496,645	34%	$4,432	981,833	66%	$907	$890,681,632
10 *	$694	302,062	35%	$1,093	558,069	65%	$399	$222,546,941
11 *	$2,014	2,856,593	44%	$2,955	3,679,664	56%	$942	$3,465,259,834
13 *	$5,035	141,413	24%	$7,229	450,463	76%	$2,194	$988,454,807
14 *	$2,072	360,466	21%	$3,148	1,358,022	79%	$1,076	$1,461,448,268
19 *	$3,230	40	3%	$7,982	1,523	97%	$4,752	$7,237,031
20 *	$3,481	556,676	44%	$5,132	703,309	56%	$1,651	$1,161,187,129
22	$0	120	100%	$0	0	0%		$0
24 *	$3,852	229,216	47%	$5,571	255,412	53%	$1,719	$439,049,562
26 *	$4,187	180,092	36%	$6,414	321,144	64%	$2,227	$715,134,017
28 *	$2,795	440,031	18%	$5,613	1,980,606	82%	$2,818	$5,582,072,745
29 *	$3,013	130,087	18%	$4,718	586,992	82%	$1,705	$1,000,718,313
30 *	$4,735	400	28%	$7,455	1,040	72%	$2,720	$2,829,018
32 *	$2,859	77,032	15%	$4,611	434,016	85%	$1,751	$760,016,883
33 *	$3,839	144,724	22%	$5,501	521,622	78%	$1,663	$867,202,318
34 *	$4,641	196	23%	$10,101	660	77%	$5,460	$3,603,705
35 *	$3,221	364	2%	$8,601	14,491	98%	$5,379	$77,950,997
36 *	$4,828	6,080	50%	$7,792	6,072	50%	$2,965	$18,002,583
37 *	$2,921	1,167,136	59%	$4,452	810,392	41%	$1,530	$1,240,156,269
39 *	$5,097	40	50%	$6,522	40	50%	$1,425	$56,982
40 *	$2,404	127,886	31%	$3,663	284,985	69%	$1,259	$358,859,144
41 *	$2,785	8,810	31%	$5,124	19,901	69%	$2,339	$46,542,577
42 *	$1,938	7,600	94%	$2,997	480	6%	$1,058	$508,035
44	$0	360	100%	$0	0	0%		$0
48 *	$2,705	4,796	21%	$5,111	17,574	79%	$2,406	$42,276,224
Total		7,238,865	36%		12,988,310	64%	28%	$19,351,795,013

* Competitive rates were calculated based on the costs of captive cars.

Exhibit C

Over 300% RVC

2014 Breakdown of the Cost of Non-Competitive Rates by 2 Digit STCC's

Commodity STCC	Avg. Competitive Rate	Competitive Cars	Percent of Competitive Cars	Avg. Captive Rate	Captive Cars	Percent of Captive Cars	Rate Diff. Per Car	Cost of Non-Competitive Rates
01 *	$2,289	496,645	78%	$4,081	142,110	22%	$1,791	$254,534,084
10 *	$986	302,062	76%	$2,143	97,372	24%	$1,157	$112,663,361
11 *	$1,249	2,856,593	61%	$2,934	1,793,662	39%	$1,684	$3,021,098,259
13 *	$4,776	141,413	62%	$8,374	87,149	38%	$3,597	$313,493,777
14 *	$1,709	360,466	38%	$3,278	581,495	62%	$1,568	$911,997,660
19 *	$3,234	40	4%	$9,305	1,072	96%	$6,070	$6,507,434
20 *	$2,966	556,676	80%	$5,810	138,809	20%	$2,844	$394,719,992
22	$0	120	100%	$0	0	0%	$0	$0
24 *	$2,901	229,216	82%	$5,418	49,464	18%	$2,517	$124,517,849
26 *	$3,704	180,092	69%	$7,409	80,224	31%	$3,706	$297,275,926
28 *	$2,424	440,031	31%	$6,360	1,001,372	69%	$3,936	$3,941,104,259
29 *	$2,286	130,087	34%	$4,788	255,485	66%	$2,502	$639,127,997
30 *	$4,486	400	53%	$10,423	360	47%	$5,937	$2,137,270
32 *	$2,522	77,032	29%	$5,014	193,158	71%	$2,492	$481,364,380
33 *	$3,027	144,724	40%	$5,893	218,144	60%	$2,866	$625,301,881
34 *	$4,071	196	28%	$10,728	500	72%	$6,657	$3,328,558
35 *	$2,864	364	3%	$8,995	11,745	97%	$6,131	$72,005,211
36 *	$2,817	6,080	72%	$7,986	2,396	28%	$5,169	$12,385,505
37 *	$2,297	1,167,136	90%	$4,975	129,595	10%	$2,678	$347,095,161
39	$0	40	100%	$0	0	0%	$0	$0
40 *	$1,959	127,886	53%	$3,977	113,088	47%	$2,017	$228,147,555
41 *	$2,805	8,810	42%	$5,672	12,193	58%	$2,867	$34,960,131
42 *	$3,137	7,600	98%	$6,599	120	2%	$3,462	$415,393
44	$0	360	100%	$0	0	0%	$0	$0
48 *	$2,861	4,796	45%	$7,771	5,861	55%	$4,909	$28,774,524
Total		**7,238,865**	**60%**		**4,915,374**	**40%**	**-19%**	**$11,852,956,166**

* Competitive rates were calculated based on the costs of captive cars.

Exhibit D

2005 Breakdown of the Cost of Non-Competitive Rates by 2 Digit STCC's

Commodity STCC	Total Cars	Avg. Competitive Rate	Competitive Cars	Percent of Competitive Cars	Avg. Captive Rate	Captive Cars	Percent of Captive Cars	Rate Difference per Car	Cost of Non-Competitive Rates
01	1,622,550	$2,102	916,251	56%	$2,673	706,299	44%	$572	$403,753,379
10	709,600	$596	243,436	34%	$776	466,164	66%	$180	$83,855,137
11	7,565,750	$1,019	4,071,103	54%	$1,587	3,494,647	46%	$567	$1,982,059,232
13	10,536	$1,331	4,484	43%	$2,070	6,052	57%	$738	$4,467,957
14	1,686,771	$718	972,195	58%	$1,089	714,576	42%	$371	$265,003,630
19	2,104	$2,246	516	25%	$6,312	1,588	75%	$4,066	$6,456,448
20	1,218,389	$2,356	855,713	70%	$3,864	362,676	30%	$1,508	$546,940,100
22	1,080	$4,484	640	59%	$6,705	440	41%	$2,221	$977,420
23	40	$0	40	100%	$0	0	0%	$0	$0
24	737,050	$3,165	523,810	71%	$5,188	213,240	29%	$2,023	$431,386,357
25	1,640	$0	1,640	100%	$0	0	0%	$0	$0
26	719,988	$2,983	432,864	60%	$4,603	287,124	40%	$1,619	$464,916,562
28	2,019,780	$2,037	632,250	31%	$3,791	1,387,530	69%	$1,755	$2,434,614,580
29	799,245	$1,606	351,527	44%	$2,558	447,718	56%	$952	$426,106,840
30	2,640	$3,424	2,320	88%	$3,970	320	12%	$546	$174,686
32	645,246	$1,820	277,056	43%	$3,016	368,190	57%	$1,196	$440,461,084
33	718,946	$2,057	373,179	52%	$3,074	345,767	48%	$1,017	$351,596,324
34	3,780	$3,203	2,560	68%	$4,864	1,220	32%	$1,661	$2,025,927
35	4,405	$3,472	2,168	49%	$6,719	2,237	51%	$3,247	$7,264,139
36	32,620	$2,425	25,596	78%	$4,312	7,024	22%	$1,886	$13,248,755
37	579,017	$1,852	377,796	65%	$3,847	201,221	35%	$1,994	$401,305,356
39	3,760	$2,007	3,440	91%	$3,707	320	9%	$1,700	$544,072
40	552,582	$1,598	309,074	56%	$2,571	243,508	44%	$973	$237,041,659
41	14,796	$1,674	6,040	41%	$4,126	8,756	59%	$2,452	$21,468,418
42	8,208	$1,483	7,396	90%	$2,316	812	10%	$834	$676,946
44	80	$0	80	100%	$0	0	0%	$0	$0
48	11,796	$3,101	2,240	19%	$5,372	9,556	81%	$2,271	$21,700,000
Total	**19,672,399**		**10,395,414**	**53%**		**9,276,985**	**47%**	**-6.0%**	**$8,548,045,008**

Over 300% RVC
2005 Breakdown of the Cost of Non-Competitive Rates by 2 Digit STCC's

Commodity STCC	Avg. Competitive Rate	Competitive Cars	Percent of Competitive Cars	Avg. Captive Rate	Captive Cars	Percent of Captive Cars	Rate Diff per Car	Cost of Non-Competitive Rates
01	$1,698	916,251	89%	$2,778	114,314	11%	$1,080	$123,423,284
10	$971	243,436	83%	$2,117	50,268	17%	$1,146	$57,598,267
11	$930	4,071,103	71%	$1,761	1,692,536	29%	$831	$1,405,921,218
13	$1,663	4,484	85%	$3,356	800	15%	$1,692	$1,353,757
14	$602	972,195	84%	$1,223	179,035	16%	$621	$111,144,791
19	$1,991	516	33%	$8,330	1,068	67%	$6,339	$6,770,556
20	$2,259	855,713	94%	$5,359	58,621	6%	$3,100	$181,751,815
22	$4,484	640	94%	$8,995	40	6%	$4,512	$180,460
23	$0	40	100%	$0	0	0%	$0	$0
24	$2,690	523,810	95%	$6,288	29,016	5%	$3,599	$104,414,090
25	$0	1,640	100%	$0	0	0%	$0	$0
26	$2,905	432,864	89%	$5,869	52,732	11%	$2,964	$156,307,987
28	$1,707	632,250	50%	$4,532	626,310	50%	$2,824	$1,768,851,214
29	$1,264	351,527	71%	$2,952	141,990	29%	$1,688	$239,669,755
30	$0	2,320	100%	$0	0	0%	$0	$0
32	$1,624	277,056	75%	$3,603	93,224	25%	$1,979	$184,494,992
33	$1,881	373,179	80%	$3,525	92,904	20%	$1,644	$152,755,873
34	$2,321	2,560	84%	$5,374	500	16%	$3,053	$1,526,470
35	$2,580	2,168	68%	$7,452	1,035	32%	$4,872	$5,042,947
36	$2,627	25,596	96%	$7,710	1,028	4%	$5,083	$5,225,319
37	$1,748	377,796	82%	$4,581	80,230	18%	$2,832	$227,231,168
39	$2,105	3,440	97%	$5,602	120	3%	$3,497	$419,648
40	$1,537	309,074	83%	$3,270	63,980	17%	$1,733	$110,846,151
41	$1,642	6,040	51%	$4,933	5,916	49%	$3,291	$19,466,936
42	$950	7,396	96%	$2,138	284	4%	$1,188	$337,338
44	$0	80	100%	$0	0	0%	$0	$0
48	$2,806	2,240	32%	$6,068	4,760	68%	$3,262	$15,528,184
Total		**10,395,414**	**76%**		**3,290,711**	**24%**	**-52.0%**	**$4,880,262,223**