



ASSOCIATION OF AMERICAN RAILROADS
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December 23, 2015

239774

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

ENTERED
Office of Proceedings
December 23, 2015
Part of
Public Record

Re: EP 724 (Sub-No. 4), *United States Rail Service Issues – Performance Data Reporting*

Dear Ms. Brown:

Pursuant to the decision served in the above docketed proceeding on December 16, 2015, the Association of American Railroads (“AAR”), on behalf of itself and its Class I freight railroad members, submits this letter to comment on the summaries of meetings held between November 19, 2015 and December 7, 2015 by Board staff with parties to this proceeding. The establishment of meetings between a broad spectrum of interested stakeholders and agency staff appears to have been a productive procedure to inform the agency on technical matters. The public posting of detailed summaries of the meetings and this opportunity to comment ensures that all parties can consider and comment on the issues raised in the meetings.

The AAR would like to comment on an apparent theme that is evident in the summaries of meetings between those groups and the STB staff, reflecting many of the written comments filed by shipper interests in this proceeding. That theme is the suggestion that the Board should require railroads to report detailed service data to hold railroads accountable for service problems. But as the AAR and its railroad members have made clear, operating metrics merely show a measurement of railroad operations at a moment in time. They do not in any way indicate a cause of a problem or a violation of law. Railroads operate as one link in an overall logistics supply chain that includes shippers, ports, other modes of transportation, intermediaries like warehouses, and receivers. Difficulties at any point in this chain will impact railroad service metrics negatively, though such difficulties are beyond the control of railroads.

Moreover, railroad service is often a function of the amount of resources on hand to meet demand for transportation. The amount of resources available is driven by forecasts that in large

part originate with shippers. If those forecasts are not accurate, railroads will be challenged to keep their networks fluid. In such cases, railroad metrics will rise and fall, but they do not reveal anything about the causation of service problems or efforts to resolve them. Instead, the Board's focus in this proceeding should be on monitoring the overall health of the rail network. For this purpose, the metrics published by the AAR are sufficient and many of the more granular metrics currently being collected by the Board are unnecessary and create a distorted view of railroad operations.

Finally, the AAR notes that the Chicago Metropolitan Agency for Planning ("CMAP") met with agency staff to discuss Chicago-specific data. The Board should be aware that, in response to an inquiry from CMAP and other area entities, AAR President and CEO, Edward R. Hamberger wrote a letter dated December 2, 2015 inviting those Chicago area government partners to meet with the AAR to discuss their data needs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Timothy J. Strafford". The signature is stylized and cursive.

Timothy J. Strafford
Counsel for the Association
of American Railroads