

SURFACE TRANSPORTATION BOARD

Docket No. EP 724 (Sub-No. 4)

UNITED STATES RAIL SERVICE ISSUES—PERFORMANCE DATA REPORTING

Summary of Ex Parte Meeting between the Association of American Railroads (AAR) and
Surface Transportation Board (STB) StaffHeld November 20, 2015, 10:00 AM – 10:40 AMAAR Attendees: Frank Hardesty, Timothy StraffordSTB Attendees: Michael Higgins, Ronald Molteni, Stephanie Lyons, Lisa Novins, Nderim Rudi,
Jason Wolfe

AAR began by expressing its appreciation of the Board's decision to hold ex parte meetings in order to allow for a constructive dialogue on technical matters. AAR stated that its goal is to "flesh out" the Board's data collection objectives and develop a better understanding of the Board's goals for permanent reporting of performance metrics. Reporting macro-level data could be useful, consistent with Board authority, and not overly burdensome. However, AAR stated that if the Board identifies an issue based on system level metrics, it should then ask for specific information on a case-by-case basis.

AAR next stated that its members do not fully understand how rail customers will use the metrics for planning purposes. The railroads understand the need for sharing data related to high-level fluidity issues and the need for discussion of specific service issues with individual customers, but data about the middle ground issues does not conform to AAR's understanding of logistical planning. AAR also asserted that consistency in data collection is important; and that to be useful, metrics must be collected over time. The Board has collected a year's worth of data; making future or ongoing data collection consistent with that data would be useful.

The railroads currently voluntarily report metrics to AAR. Those metrics were developed in the mid-1990s and grew out of service issues at that time. The railroads' intent was to provide performance information that would help customers. The high level information provides a view of fluidity across the system and whether there are service problems.

AAR's filed comments in this proceeding stated that some metrics are too granular and impose an undue burden. STB Staff asked if there are other, less granular metrics that could augment the current AAR metrics and allow for a more informed understanding of network performance and fluidity, while balancing the burden on industry (such as data the railroads use in the ordinary course of business). AAR responded that its members have not discussed this issue and that it is not aware of additional metrics. Railroads often measure the same issues in different ways, and AAR is not aware of any metrics on which its members agree. The voluntary, system-level AAR metrics were developed in a collaborative way and it took considerable effort to arrive at common definitions.

Next, STB Staff inquired as to AAR's views on weekly reporting of metrics such as train on-time arrival, on-time departure, and connection performance, if the Board allowed each carrier to define these metrics individually, understanding the data would not be uniform across railroads. AAR responded that it would be worthwhile to ask the individual railroads. AAR suggested that the railroads might ask what the Board expects to see from that metric and expressed concern that data not be misunderstood or misapplied.

AAR suggested that the Board should work backwards from what it is going to do with the data to determine how it needs to collect the data. When looking at train on-time arrival, it would be a challenge to define a "train;" how is that definition useful and meaningful; how would the data be used? Coming to consensus is difficult and factors may change with circumstances.

STB Staff noted that some railroads currently measure and publish metrics such as train on time departure, on time arrival, re-crew rate, connection performance, and plan adherence on their own systems. STB Staff asked if there is utility to collecting this type of data. AAR asserted that it is not aware of any consensus about those metrics. Metrics are useful for determining trends on a particular railroad but not for comparing railroads. STB Staff questioned whether the data could be useful to evaluate traffic movement, identify operational issues, study spikes/declines in each category, and see how the metrics impact each other on a single railroad. AAR stated that it is not clear how additional metrics provide more useful information and to what end. AAR questioned how the information would help the Board fulfill its statutory mission.

Next, STB Staff asked if the Board should re-examine the proposed Chicago-related metrics. AAR responded that Chicago is a difficult issue on which to develop consensus. There are multiple "Chicagos" (i.e., the Class Is, Metra, Amtrak), and each Class I railroad has its own perspective about how Chicago works. They measure information differently and analyze the same data differently.

In closing, AAR made two points. First, the railroads are not satisfied with the proposed definition of "unit trains" because it is not consistent with how they define unit trains. Second, any required reporting for major infrastructure projects should be flexible so that railroads are not locked into public statements regarding major infrastructure investments that may need to change dramatically over time. Finally, AAR requested that the Board consider annual, rather than quarterly, reporting on infrastructure projects.