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BEFORE THE
SURFACE TRANSPORTATION BOARD

Ex Parte No. 724 (Sub-No. 4)

UNITED STATES RAIL SERVICE ISSUES –
PERFORMANCE DATA REPORTING

COMMENTS OF
HIGHROAD CONSULTING, LTD.

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The purpose of this filing is to support the new rules proposed in the Supplemental Notice of Proposed Rulemaking, dated April 29, 2016. We commend the Board for the time and effort committed to gathering information in the stakeholder meetings and we believe the proposed rules are fair and address concerns presented by the interested parties.

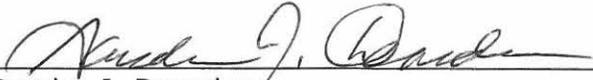
The importance of need for continued, standardized reporting cannot be understated. While data can be accessed on the railroads' websites it is important for shippers that benefit from the data, to have standardized reporting, as shippers use the data for planning. We use the data to better understand the fluidity in the market and based on the performance metrics and information received from suppliers, shippers have the information needed to adjust their rail orders accordingly.

Our remaining comments will focus on New Request No. 12 which would require the Class I railroads to report their weekly car order fulfillment rates by major car type, and the percentage of cars due to be placed vs. actually or constructively placed. The proposed rule addresses our request for additional metrics (percent of car orders filled and percent of cars placed vs. percent of cars ordered in) as presented in the meeting with STB staff, Summary Exhibit 1 at 13. However, some consideration must be given to the fact that some railroads expire car orders at the end of each week. As a result, shippers are required to re-file their car orders but more important, for those railroads, the backlog of orders will be understated.

We thank the Board for the opportunity to participate in this proceeding and trust the Board's decision will confirm rules to ensure the integrity of data reported.

Respectfully submitted,

May 31, 2016



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