



**ASSOCIATION OF AMERICAN RAILROADS**  
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October 22, 2014

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

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ENTERED  
Office of Proceedings  
October 22, 2014  
Part of  
Public Record

Dear Ms. Brown:

I am writing on behalf of the Class I freight railroad members of the Association of American Railroads (AAR) directed to respond to the Surface Transportation Board's (Board) decision on October 8, 2014 in EP 724 (Sub-No. 3), *United States Rail Service Issues – Data Collection*.<sup>1</sup> The Class I railroads are submitting information today responsive to the decision's request for service data.

The public, the Board, and the railroad industry would have benefited from a public dialogue in developing reporting requirements designed to reach specifically defined regulatory goals. A constructive public discourse regarding service data reporting would have revealed that different railroads capture information in different ways and could have led to a more productive and less burdensome collection of information that would have satisfied the Board's regulatory objectives. Such a process would have also ensured that the notice and comment aspects of the Administrative Procedure Act and the requirements of the Paperwork Reduction Act were met.

Nevertheless, the AAR and its Class I freight railroad members will provide the information requested by the Board to the best of their ability, even if, given the short window of

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<sup>1</sup> This letter is written on behalf of the Class I freight railroads except Canadian Pacific Railway.

time for compliance with the Board's decision, the information in certain items cannot be uniformly reported.

Sincerely,

A handwritten signature in black ink, appearing to read 'TJ Strafford', written in a cursive style.

Louis P. Warchol  
Timothy J. Strafford  
Counsel for the Association  
of American Railroads