



ASSOCIATION OF AMERICAN RAILROADS
425 3rd Street, SW, Suite 1000
Washington, D.C. 20024

Timothy J. Strafford
Associate General Counsel

Phone: (202) 639-2506
Fax: (202) 639-2868
E-mail: tstrafford@aar.org

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

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

Dear Ms. Brown:

Pursuant to the decision served in this proceeding on December 30, 2014, the Association of American Railroads, on behalf of its freight railroad member representatives in the Chicago Transportation Coordination Office (“CTCO”), hereby files the attached detailed explanation of CTCO’s service contingency protocols.

Sincerely,

Timothy J. Strafford
Counsel for the Association
of American Railroads

Chicago Terminal Contingency Protocols, Triggers & Countermeasures
Prepared by the Class I Members of the Chicago Transportation Coordination Office

The Chicago Transportation Coordination Office/Chicago Planning Group (CTCO/CPG) works to identify critical factors impacting rail operations within the Chicago Complex. CTCO/CPG recognizes that critical levels, when reached, negatively impact train, transfer, and switching operations thus impacting performance of rail traffic moving to, from, or via the Chicago Gateway. The rail carriers operating in Chicago proactively monitor critical vital signs, revise operating conditions, and implement appropriate targeted actions to maintain fluid operations to, from, and through Chicago. Through CTCO, lessons learned are compiled and reviewed for continuous process improvement following completion of each winter season. Appropriate revisions to procedures are then enacted to enhance the terminal's ability to respond to future events.

The structure of the Chicago Terminal Dispatch Centers and Command Centers is intended to resolve tactical challenges surrounding interchange trains at the lowest level. Escalation procedures however are in place to ensure that extreme challenges that cannot be resolved at the lowest level have recourse to achieve resolution in the interest of protecting fluidity through the Chicago Terminal.

The following carriers participate in the efforts to make the Chicago Terminal as fluid as possible: AMTRAK, Belt Railway Company of Chicago, BNSF Railway, CN Railway, CP Railway, CSXT, Indiana Harbor Belt Railroad, METRA, Norfolk Southern Railway, Union Pacific Railroad (collectively, Chicago Railroads)

CTCO has established automatic triggers based upon defined criteria for monitoring the operating conditions of the various elements that make up the Chicago complex. At times, it may be appropriate for railroads to override such automatic changes due to dynamic variables that may not be captured through automated data systems. Additionally, there are some instances that railroads may request votes to implement elevated Operating Conditions (OPCON) for conditions not captured by automation.

OPCON

The OPCON identifies the current status of the Chicago Terminal through continuous monitoring of conditions across the multiple components. Capacities and other vital indicators of fluid operations at Key Yards and Principal Corridors have been assessed, and are continually monitored. OPCON status is updated based on data received via Railinc's ClearPath system with resulting escalations and countermeasures as appropriate.

OPCON Green – Indicates fluid conditions with key indicators within fluid operating parameters.

OPCON Yellow – Key Yard or Corridor with key indicators exceeding fluid operating parameters but less than red line values. Results in a minimum 15% reduction in freight volume into/through affected areas of the Chicago terminal.

OPCON Red – Defined as Key Yard or Corridor, or Chicago complex in critical operating status. Defined red line values outlined in this agreement have been exceeded. Results in a minimum 25% reduction in freight volume into/through affected areas of the Chicago terminal.

Additional factors including, but not limited to, weather, service interruptions, and maintenance of way may also trigger changes to OPCON status either automatically or by a two-thirds vote of the Chicago railroads.

OPCON Change Process

The CTCO is charged with the development, implementation and daily oversight of the Chicago Terminal Operating Condition. Based on the information received via the Daily Scorecard, and supplemented by information collected on CTCO conference calls, the CTCO monitors vital signs and implement appropriate OPCON status changes. These parameters have been identified as having the capacity to negatively impact terminal operations.

Overall operating condition of the Chicago Terminal is determined by the sum of the health of its key rail yards, and corridors. Daily monitoring of actual and forecast traffic through these locations are to be compared to pre-determined thresholds, which will be used to establish an OPCON for any given location within the Chicago Terminal. The need to establish an elevated OPCON may be via automatic changes due to critical threshold indicators, or by the Chicago Railroads, by two-thirds vote, when deemed appropriate to maintain fluid operations through Chicago.

The ultimate objective under any elevated OPCON is to methodically return all components of Chicago to fluid operating levels. Employing parameters specified for each Key Yard and Corridor, the goal is to step down from Red to Yellow and then to Green as dictated by the vital signs while maintaining fluid operations across the remaining components of the terminal. The CTCO also monitors and maintains chronological documentation of recovery progress.

Data Collection and Reporting

Factual information is gathered by the CTCO and reported on the CTCO Daily Scorecard and daily conference calls. Sustained operations above, or below predefined Vital Signs are triggers employed for determining automatic changes to OPCON levels. Parameters consist of a combination of automated data feeds and information reported by carriers on the recurring conference calls.

Automatic Changes to OPCON Levels

Revision to OPCON levels occurs automatically when Vital Signs are exceeded or return to within parameters for the next lower level, as appropriate. A 48-hour period is built in prior to initiating pre-agreed to action items. This is designed to prevent automatic actions being initiated due to transitional fluctuations and to allow the progressive escalation process ample opportunity to restore fluid capacities prior to triggering wider system actions.

During the first 48 hour period following an OPCON change to Yellow or Red, a series of notifications and escalations take place. The goal is to escalate challenges in a methodical standardized process with the intent of implementing timely actions to restore fluid levels prior to initiating automatic countermeasures.

Manual Changes to OPCON Levels

Railroads retain authority to elevate OPCON status for territories under their purview (“Tier I”), and may request a vote at any time to elevate OPCON levels for the entire Chicago Terminal under “Tier II” conditions. Conditions outside the scope of data collection capabilities may at times necessitate modification of OPCON status. Examples of such conditions include, but are not be limited to, maintenance of way, service interruptions, and weather phenomena. In such instances, the Chicago Railroads may call for a vote to modify OPCON status based on forecast, imminent, or emergent conditions.

Tier II – Chicago Terminal

The Chicago Railroads may, at any time, request consideration by the voting members/participants to escalate the entire Chicago terminal under Tier II should they believe conditions warrant such action. CTCO coordinates a forum of voting members, or their designated representatives, via conference call within four hours of said request. Voting members shall then discuss the merits of the request and subsequently vote to accept, or reject an OPCON change. If accepted by two-thirds vote, the group must then decide upon appropriate response action items, which may include activation of pre-determined Action Items.

The Chicago Terminal may experience weather or other phenomena impacting the entire terminal, and/or deteriorating conditions across various Critical Points. Conditions impacting the overall condition of the entire Chicago Terminal, and/or significant portions of it, may necessitate setting an Operating Condition for the Terminal.

In the event elevated Operating Conditions Yellow or Red becomes necessary, all rail carriers have agreed to implement pre-determined action items. In addition, other actions designed to improve the condition of the Terminal can be identified on the Railroads conference call. The participants on the call relay these initiatives to their respective organizations for implementation. Each Railroad is responsible for implementing corrective actions within their respective system to address the conditions that warranted an elevated Operating Condition. This includes monitoring operations and following up with the Service Design and Operations groups within their organizations to ensure that there is concurrence between the two departments and that the appropriate action being taken. The Chicago Railroads have agreed to, at a minimum, participate on the afternoon conference call for the duration of time Chicago Terminal remains in Operating Condition Yellow and Red.

Reduction of the Established Operating Condition:

The CTCO monitors all Vital Signs and Action Items during elevated operating conditions. When appropriate, CTCO will reduce to the next lower OPCON status employing the procedures outlined above.

Vital Signs

The operating conditions across Key Yards and Corridors throughout the Chicago complex are monitored and reported regularly via the Daily Scorecard and information reported by Command Center personnel. Trend information will be analyzed on two regular daily conference calls in the morning and afternoon. The following parameters have been identified as primary drivers impacting fluid operations across the various segments of the terminal.

Key Yards: Inventory (Scorecard data)
 Dwell (Scorecard data)

Corridors: Number of trains inbound (Scorecard data)
 Velocity (Scorecard data)

Meteorological Conditions (obtained from National Weather Service)

Meteorological conditions within the Chicago Terminal have been, and will continue to be, a crucial factor impacting rail operations. Extreme temperatures, high wind, heavy precipitation (snow, ice, rain, etc.) are the most prevalent, although not all inclusive, list of conditions that have historically impacted operations within the Chicago Terminal. Other phenomena may require consideration as conditions evolve and will be monitored and acted upon as needed.

National Weather Service forecasts are the sole data source for determining changes to OPCON status based on forecast meteorological conditions. At a minimum, the following conditions forecast within 24 hours cause the OPCON status to change under Tier II for the Chicago Complex. As weather forecasts indicate an approaching weather condition, CTCO initiates conference calls with the Chicago Railroads daily to review status of inbound storm system, and its forecast. Railroads have the opportunity to defer OPCON action items by two-thirds vote at any time prior to storm's projected arrival.

- **OPCON Yellow**
 - Forecast 8 to 12 inches of snow in a 24-hour period.
 - Accumulation of snow adversely affecting the rail operations in the Terminal with sustained winds greater than 25 miles per hour.
 - Forecast high temperatures between minus 5 and minus 19 degrees Fahrenheit

- **OPCON Red**
 - Forecast more than 12 inches of snow in a 24-hour period

- Accumulation of snow adversely affecting the rail operations in the Terminal with sustained winds greater than 35 miles per hour.
- Forecast high temperatures below minus 20 degrees Fahrenheit.

Multiple Deteriorating Components

Continuing deterioration of operating conditions across multiple key yards and/or corridors across the Chicago complex can result in automatic escalation of the complex to a corresponding OPCON Yellow or Red. The following key is employed when determining such changes unless Railroads elect to override such change employing the procedures previously outlined.

OPCON Green	0-3 components experiencing deteriorated OPCON
OPCON Yellow	4-5 components experiencing deteriorated OPCON
OPCON Red	6 or more components experiencing deteriorated OPCON

Other Factors Impacting OPCON

Chicago Complex OPCON may be impacted by multiple variables in addition to those outlined above. It is the responsibility of individual railroads to capture and report to the Chicago railroads group in a timely manner any operating challenges that may impact the ability to maintain fluid operations throughout the Chicago Complex.

Action Items Resulting from Changes to the OPCON Level

The Chicago Railroads are responsible for implementing action items in response to changes to the OPCON levels. Action Items are dynamic and specific to individual railroads. Action Items reflect operational changes contemplated to increase fluidity in the Chicago Terminal. The operational changes are focused on the fluidity of the Chicago Terminal, but may occur elsewhere on the Chicago railroads' networks to achieve this end. Not only are Action Items specific to the primary railroad executing the action, but they are also specific to the secondary participating railroad that is affected by the Action Item. Action Items can include rerouting empty equipment, changing interchange points, bypassing yards, changing how trains are blocked and built, restricting or rerouting traffic. Action items are designated for execution at OPCON Yellow or OPCON Red, or both. Action items are also specific to Key Yards and Corridors.