309692

ENTERED Office of Proceedings June 20, 2025 Part of Public Record

CPKC-34

BEFORE THE SURFACE TRANSPORTATION BOARD

FINANCE DOCKET NO. 36500 (SUB-NO. 6)

CANADIAN PACIFIC RAILWAY LIMITED, ET AL. – CONTROL – KANSAS CITY SOUTHERN, ET AL. (GENERAL OVERSIGHT)

CPKC'S JUNE 20, 2025 REPORT ON SERVICE ACTION PLAN

In response to Chairman Fuchs' letter dated June 17, 2025, and in accord with Decision

35 in Finance Docket No. 36500 and CPKC's commitments in that proceeding, Canadian Pacific

Kansas City Limited ("CPKC"), on behalf of its U.S. rail carrier subsidiaries,¹ is providing this

"Service Action Plan" to address declines since early May on a portion of the CPKC network in

First-Mile Last-Mile (Industry Spot and Pull) ("FMLM") and manifest on-time ("Manifest

OTP") performance metrics.²

The Chairman's letter correctly observes that since the May 3, 2025 consolidation of

CPKC's U.S. IT systems (what CPKC has referred to as "Day N"), CPKC customers in the

southern United States (on the legacy-KCS network) have experienced "elevated delays, missed

switches, and congestion." Those service problems have been reflected in declines in two of the

¹ CPKC's U.S. rail carrier subsidiaries include Soo Line Railroad Company; Central Maine & Quebec Railway US Inc.; Dakota, Minnesota & Eastern Railroad Corporation; Delaware & Hudson Railway Company, Inc. (collectively "CP" or "CP/Soo"); The Kansas City Southern Railway Company, Gateway Eastern Railway Company, and The Texas Mexican Railway Company (collectively, "KCS").

² See Decision No. 35 (at 141-42); Finance Docket No. 36500, Applicants' Final Brief at 9, Appendix A at A6. The specific metrics are the Manifest Carloads On Time metric based on EP 770 Item 7(i) and the First Mile/Last Mile (Industry Spot & Pull) metric based on EP 770 Item 5. See Finance Docket No. 36500, Applicants' Final Brief, Appendix A, p. A9 (Table 1.1). CPKC committed that, if specific triggers associated with four-week rolling average performance were reached, CPKC would "immediately and proactively assess the root cause of the adverse trend in the applicable metric; and ... develop and implement a customized Plan to address the issue, and, within two weeks of the threshold being triggered, ... report that Plan to the Board and public." *Id.*, Appendix A, Rider 1, §§ 2(c)(i) & (ii).

key metrics on which CPKC based its service action plan commitments. Specifically, although FMLM performance has improved in every week since that ending May 23, CPKC's four-week rolling average FMLM performance fell short of the service action plan trigger associated with this metric (*i.e.*, 76.0%) beginning with the week ending June 6, 2025, as shown in Figure 1 below.³ Figure 1 depicts four-week rolling average performance with the dashed red line, with the weekly performance levels shown in solid red. The four-week average FMLM performance for that week (72.6%) and the subsequent week ending June 13 (71.7%) were distinctly inferior to the legacy-CP and legacy-KCS performance levels that pre-dated the May 3 IT cut-over.⁴

³ The CPKC service action plan triggers were originally reported for the separate CP and KCS networks in CPKC's October 2023 Data Submission in this proceeding (CPKC-1), and the benchmark applicable to the combined CPKC U.S. network were reported and explained in CPKC's June 2025 Data Submission (CPKC-33), filed June 16, 2025 in this docket.

⁴ It should be noted that pre-Day N performance data based on legacy-KCS's Management Control System ("MCS") are not directly comparable to post-Day N combined CP-KCS performance data because of differences in the way certain metrics were calculated by MCS and functional differences in the way CPKC's post-Day N systems operate. For example, with respect to FMLM performance, legacy-KCS pre-Day N performance data was based on comparison to work orders prepared by MCS that adjusted the required work based on a variety of factors – *e.g.*, when a customer was performing work on its track, impeding delivery whereas CPKC performance post-Day N (consistent with the way legacy-CP measured FMLM performance) is based directly on the unadjusted number of customer orders successfully fulfilled.

FIGURE 1



CPKC's Manifest OTP performance also fell short of CPKC's standards in recent weeks. Despite improvements since the week ending June 6, CPKC's four-week rolling average Manifest OTP performance for the week ending June 13, 2025, fell to 57.3%, which as shown in Figure 2 below was below the service action plan trigger associated with that metric (*i.e.*, 58.3%), and was inferior to the legacy-CP and legacy-KCS performance levels that pre-dated the May 3 IT cut-over.

FIGURE 2



CPKC's level of service performance on the legacy-KCS network since May 3, 2025—as reflected in part in the FMLM and Manifest OTP metrics—does not measure up to CPKC's standards for the quality of service it provides customers or the efficient operation of its network. As explained in greater detail below, CPKC has been devoting intensive efforts since the first day post-cutover to improve service and rectify the conditions that caused the recent decline. Consistent with the Chairman's request and CPKC's service action plan commitment, the balance of this Report outlines CPKC's determination of root causes and plan to restore service to normal levels.

At a high level, CPKC is pleased to report that there are strong signs that the efforts CPKC has undertaken since May 3 have succeeded in stabilizing overall service levels and that CPKC has begun what it expects will be a steady march toward normalcy on the legacy-KCS network. As shown in Figures 1 and 2, the weekly FMLM and Manifest OTP metrics (the solid red lines) show some recent improvement: FMLM beginning during the week ending May 30, and Manifest OTP during the week ending June 13. While it is too early to offer firm predictions about the timing of a full return to the high level of service performance that CPKC strives to provide customers, CPKC anticipates that service levels for the vast majority of legacy-KCS customers will be in the normal range in the second half of July. Section II.D below reviews additional signs of progress. CPKC anticipates that improvements for some customers may take somewhat more time, and that many customers will need additional time to work through backlogs of delayed inbound or outbound shipments, but CPKC's progress to date suggests that the legacy-KCS network will be functioning well by late July and sooner in many areas.

I. CPKC'S ASSESSMENT OF ROOT CAUSES

The FMLM and Manifest OTP performance reflected in Figures 1 and 2 stemmed from service disruptions that arose on the legacy-KCS U.S. network following the Day N replacement of the IT operating system on the legacy-KCS network (a proprietary KCS program known as MCS, short for "Management Control System") with integrated CPKC IT systems based on those used successfully for many years on the legacy-CP portion of the network (known as TYES and its user-interface overlay PTM). Unfortunately, despite intensive efforts by CPKC over more than two years to prepare for a smooth transition, the Day N IT systems cut-over encountered unexpected difficulties, primarily in three areas:

- (a) The interchange data provided by some connecting carriers for cars delivered to CPKC at legacy-KCS locations did not support CPKC's onward processing of those cars without extensive re-work of the data;
- (b) The transition on the legacy-KCS network from MCS to TYES led to difficulties maintaining accurate railcar inventories for railcars placed or requested for pick

5

up at customer facilities, particularly at locations with complex trackage layouts, in part owing to imperfect mapping of storage, team, and in-plant tracks used to place railcars; and

(c) The new system data requirements post Day N and the resulting car inventory issues created challenges for customers (many of whom were using the systems for the first time outside of a training environment) during the billing and releasing of railcars (*i.e.*, placing orders for empty cars and directing the movement of loaded cars), particularly for more complex billing permutations that were difficult to replicate in a training environment.

As a result of these issues, during the initial period post-Day N significant amounts of manual re-work were needed to improve the quality of data used by CPKC's operating systems to enable them to function effectively. Among the key issues that affected data quality were incomplete car inventories and a lack of up-to-date information on the location of railcars. These data issues, in turn, meant that the work orders needed to support further work by switch crews (*e.g.*, picking up of a car from a customer facility or the movement of a car from a serving yard to a customer facility) could not be generated until the underlying data was re-worked manually.⁵ The problems were most acute at locations where customer shipping needs and track configurations were more complex owing to the greater degree of difficulty translating those needs into the new IT system environment. These issues in turn led to congestion at customer facilities, local serving yards, and classification yards across the legacy-KCS network as inbound

⁵ Legacy-KCS's use of MCS on its U.S. network for two decades prior to the May 3 cut-over had evolved to support a variety of less rigorous inputs relating to car inventory and other operational details, whereas the transition to CPKC's TYES system (and PTM overlay) required greater precision to support efficient operations. As one example, some Class 1 railroads had provided high quality consist data to support interchanges with legacy-CP, while providing less precise data (*e.g.*, omitting the ordering of cars in a train) when interchanging with legacy-KCS.

railcars accumulated and outbound railcars could not be processed as efficiently as usual. That congestion was reflected in increased yard inventories, increased dwell times, reduced train speeds, and an increase in the locomotive and crew resources needed to move traffic over the legacy-KCS network, as shown in Figure 4 below.





The difficulties that CPKC encountered with car inventories and work order generation, coupled with the resulting congestion at local serving yards and elsewhere, rapidly impacted the FMLM performance in the period after May 3, as shown in Table 1 above. Local operating personnel were in many cases not receiving the work order information they needed to carry out requested deliveries and pick-ups on a timely basis, and that resulted in a failure to satisfy customer orders.

These same issues, as well as the delays associated with re-working the data for loaded railcars originating at interchanges and customer facilities, soon also adversely affected CPKC's

Manifest OTP performance, as shown in Figure 2 above.⁶ These early sources of delays and congestion sparked a negative feedback loop, as congestion in yards made it more difficult to locate individual railcars destined for placement at customer facilities and move them from the yard to the customer's facility, creating additional obstacles to high-quality service.

As discussed in more detail below, CPKC believes that its efforts to address these service challenges have borne fruit and service has—broadly speaking, if not for each and every individual customer—turned the corner. CPKC also wishes to reassure the Board that there is no broader underlying service problem. The post-Day N service problems have been confined primarily to the legacy-KCS portion of the CPKC network.⁷ CPKC's overall U.S. network has been running well during 2025, with volumes and GTMs higher than during the same period in 2024.⁸ Likewise, traffic on the legacy-CP U.S. network, where there were no material changes in the IT systems used by customers and operating personnel, did not experience any downturn in service levels. This is reflected, for example, in FMLM performance levels since May 3. As shown in Figure 5 below, while FMLM performance declined on legacy-KCS operating divisions during the early part of May, performance on the legacy-CP network remained rock solid above 94%.⁹

⁶ A portion of the decline in Manifest OTP likely stems from data reporting issues associated with the IT systems that legacy KCS train crews now must use to report the placement of loaded cars at customer facilities. The Manifest OTP metric is based on arrivals within 24 hours of the initial trip plan, and the clock is stopped not by the actual placement of the car, but by the crew's reporting of that placement using the portable devices they carry with them. Lags between car placement and the reporting of that placement thus reflect worse on-time performance than customers actually experience.

⁷ The Day N IT systems integration did not apply to CPKC operations in Mexico, which continue to use the MCS system, and operations there have been unaffected.

⁸ As noted below (*see* Figure 9), GTMs have been strong even on the legacy-KCS portion of the network throughout the post-Day N service challenges.

⁹ The legacy-CP figures shown in Figure 5 include performance for the Northeast US, East US, and West US Divisions. The legacy-KCS figures include performance for the Shreveport, Southeast, and





II. CPKC'S PLAN TO RETURN SERVICE TO NORMAL

CPKC has been undertaking extraordinary efforts to address the adverse service impacts arising from the Day N system integration from almost the moment that data issues arose following the cut-over at 12:01 am on May 3. Prior to Day N, CPKC had engaged with customers to familiarize them with upcoming changes to the customer portal used to place car orders and generate waybills, and CPKC provided extensive training to legacy-KCS operating personnel in the use of TYES/PTM operating system. CPKC's planning for Day N anticipated that there could be issues associated with the transition to new systems, and as a result CPKC dedicated extra resources to assist CPKC personnel and customers with that transition.

Southwest Divisions. Performance for the Midwest Division, which straddles the legacy-CP and legacy-KCS networks, is included only in the CPKC U.S.-wide figures.

Specifically, CPKC established "Hypercare" teams of employees familiar with the new systems to field internal inquiries and assist in troubleshooting. Those teams assembled in Calgary and Kansas City in advance of Day N and worked literally 24 hours a day, seven days a week to assist as needed (sustained by on-site food and lodging).

The Hypercare teams also fielded inquiries from the Customer Service Promise Team, (which have been in place since April 2023—*i.e.*, the CP/KCS control date) to assist in guiding customers through the IT transition process. The Customer Service Promise Team fielded customer inquiries, identified sources of concern, and implemented a process of triage and escalation of concerns for resolution so as to avoid as much as possible service impacts that could result in customer hardships.

As the nature and scope of the data issues became clearer in the hours and days after Day N, those resources and more were assigned to addressing the data issues and assisting customers and field operating personnel with navigating them. CPKC soon established cross-functional "SWAT-like" support teams (comprised of experts from Operations, IT, and Network Support, and Marketing & Sales, and including senior executives) to work through the issues arising from the IT transition. Those teams were deployed to key locations across the legacy-KCS network where acute service issues were being experienced, including Beaumont/Port Arthur, Mossville/Lake Charles (one of the most complex webs of industrial yards on the CPKC network), Shreveport, and Wylie. For example, CPKC's Chief Operating Officer has been on location almost continuously at key points across the legacy-KCS network (including Shreveport Yard, legacy-KCS's major switching facility; Jackson Yard, legacy-KCS's second major switching facility; and Wylie Yard, KCS's largest intermodal ramp). Two operating Senior VP's

similarly have spent several weeks as boots on the ground in the Southern Region supporting customers and front-line operating leaders.

We describe in greater detail below some of the specific steps CPKC has taken thus far that have general application to customers across the legacy-KCS U.S. network, as well as the further steps that are planned, to restore service to normal levels. Those steps have fallen into two broad categories:

- (1) Actions aimed at addressing the root causes of the problem by ensuring that car inventory data is accurate and up to date and operating personnel and customers are able to generate waybills for the movement of railcars using CPKC's IT systems in a manner that enables both efficient operations and accurate measurement of that performance; and
- (2) Steps to restore the network fluidity that was compromised during the period when operations were adversely affected by data shortcomings associated with the IT system cut-over.

Throughout this period, CPKC has also been working directly with affected customers to develop and implement bespoke plans to address those customers' unique and individualized circumstances.

A. Steps to Address Impacts Associated with Data Quality Issues Caused by the IT System Transition

Since the early morning of Day N (May 3), CPKC personnel have worked tirelessly to identify gaps in required operational data, assess the root causes of those gaps, and address the sources of those gaps. These efforts have taken numerous forms and covered the breadth of the legacy-KCS U.S. network. As noted above, CPKC deployed cross-functional "SWAT-like" support teams (comprised of experts from Operations, IT, Network Support, and Marketing &

Sales) as "boots-on-the-ground" to remediate the data issues that emerged from the Day N transition.

Those teams have been tackling, one-by-one, each of the areas where problems have arisen and remediating the full range of issues associated with the Day N transition. The teams' efforts have been time-consuming and customized to the circumstances of each customer and operating environment. The teams worked with interchange partners to improve the quality of data submitted to CPKC for cars delivered to the legacy-KCS portion of the CPKC network. They acted to restore missing car inventory data through extensive in-the-field assessments of the cars located at yards, sidings, and customer facilities across the legacy-KCS network. They assisted customers in the re-billing of railcars they were attempting to originate using proper fields and input data to support operation of CPKC's systems. They worked with local operating personnel to facilitate their understanding of and familiarity with how to make proper use of CPKC's IT systems and tablet interfaces to build and execute work orders and assignments. And, beginning with the highly complex and customer-dense Mossville/Lake Charles, LA area, they worked their way across the legacy-KCS network providing support for customers and local operating personnel to solve the array of data quality issues that hampered operations in the initial post-Day N period. Progress has not been entirely uniform. As of the date of this Report, for example, CPKC teams are focused on improving performance in the Artesia, MS area, where improvement has lagged somewhat.

One area of particular focus was the need to update track identifications in the most complex terminal areas, such as where legacy-KCS operations made use of tracks used by customers for storage that were not sufficiently identified in KCS's legacy MCS system, but for which CPKC's TYES system required accurate identifying information.

12

B. Steps to Protect and Restore Network Fluidity

Simultaneously with its efforts to address the data issues that were hampering efficient operations and adversely impacting the service levels CPKC was able to provide to its customers, CPKC took numerous steps to protect network fluidity, and then to improve fluidity as the data issues began to dissipate. Among the specific steps that CPKC took to protect network fluidity were the following:

- CPKC modified its blocking of manifest railcars at Sanchez Yard (near Laredo) and Nahant Yard (near Davenport, IA) to bypass Shreveport Yard—the largest yard on the legacy-KCS network and the hub of its east-west and north-south lines—and thereby enable Shreveport to focus on processing the backlog of railcars moving to or from customer facilities on the legacy-KCS portion of the CPKC U.S. network.
- To facilitate local operations supporting the delivery and pick up at railcars at customer facilities during the transition to more normal operations, CPKC enabled legacy-KCS operating personnel to conduct operations using CPKC's TYES system without the PTM interface, which facilitated addressing complex needs that were less readily managed via the PTM interface and also unlocked a broader base of support from the many legacy-CP personnel who had developed expertise in the use of TYES over many years.
- As a last resort, in two specific cases, CPKC embargoed railcars destined for customer facilities where the inventory of railcars precluded receipt of additional

13

cars.¹⁰ Those embargoes were established in consultation with the affected customers and with their agreement to manage congestion at their facilities. CPKC has been authorizing metered deliveries using a permit system that supports the customers' shipping needs while avoiding overwhelming the facilities and CPKC's serving yards with inbound volumes. CPKC anticipates no need to add further embargoes to address Day N-related operational issues.

C. CPKC's Proactive Customer Communications

At every stage—both before and after the May 3 cut-over—CPKC has engaged in proactive communications with affected customers, including through customer bulletins directed to a broad audience and extensive one-on-one interactions aimed at supporting the transportation needs of individual CPKC customers. CPKC's customer account managers supplemented by hands-on engagement from more senior corporate managers and company officers—have conducted frequent, often daily calls with many of the most significantly impacted customers.¹¹

The Chairman's June 17 letter implies that many stakeholders are craving additional information on the steps CPKC is taking and its expectations regarding the pace and timing of service improvements. This Report, along with the weekly cadence of updates we anticipate

¹⁰ In one other instance, CPKC issued an embargo to address a specific receiving customer's noncompliance with certain reporting requirements associated with valid waybills for inbound shipments. CPKC has continued to deliver the relevant shipments to destination with alternative consignees substituted for the noncompliant receiver.

¹¹ CPKC understands that some customer interactions with CPKC customer service personnel during the post Day-N period may have been frustrating as a result of the issues with data visibility discussed above. CPKC believes those issues have largely been rectified, but in any event CPKC encourages customers to reach out to their account representatives in cases where customer service teams do not have direct access to relevant information concerning on-the-ground conditions affecting customer transportation needs.

filing with the Board as noted below, will provide those stakeholders with up-to-date data reflecting progress towards a return to normal service levels and commentary on the key milestones and developments.

D. CPKC's Efforts Are Bearing Fruit and Will Continue Until Normal Service Levels Are Restored

There are numerous promising signs that CPKC's remedial efforts are working to prevent further service deterioration and begin achieving a return to normal service levels. CPKC intends to continue its elevated level of effort until service is durably restored to normal levels.

The data issues at the root of the recent service problems have improved substantially. The transition from MCS to TYES/PTM for CPKC operating personnel, and from MY KCS to CPKC Customer Station for customers, has been complete since May 3, with no further transition of IT systems planned for the near term. (Of course, CPKC does anticipate ongoing improvements over time in its IT systems as technology advances.)

There are many indications that customers on the legacy-KCS network, as well as CPKC operating personnel, are now able to work effectively with the new IT systems. For example, the percentage of customer orders on the legacy-KCS network that have required re-work to correct data errors has declined sharply (to levels comparable to pre-Day N), as shown in Figure 6 below.

15

FIGURE 6



Likewise, the extent of rework needed for data associated with inbound interchange traffic has fallen significantly since early June, as shown in Figure 7 below.

FIGURE 7



Another indication of improving conditions is the volume of communications from customers to CPKC customer service personnel seeking help with waybilling and other data issues, which has trended downward in recent weeks after becoming elevated in the post-Day N period, as shown in Figure 8 below.





Significant improvement is also evident in objective data reflecting CPKC's operational performance and the resulting ability to serve customers well. The week-over-week trends in FMLM and Manifest OTP performance tell part of the story. As shown in Figure 1 above on page 3, the decline in FMLM performance ended May 23, and that metric has seen steady improvement over four consecutive weeks. Improvements in Manifest OTP performance (shown in Figure 2 above on page 4) have, not surprisingly, lagged FMLM performance somewhat, in part because the OTP metric is measured only at the end of a car's trip rather than at the beginning. But here too, the week-over-week trends shown in Figure 2 suggest improvement.

Other key indicators of fundamental network health reinforce this conclusion. As shown in Figure 9 below, network fluidity on the legacy-KCS network has shown steady improvement since late May. This is seen in the declines in the number of active cars on-line (the gray bars below) after increases in that metric during the first weeks following the Day N cut-over, while the level of output (measured by gross ton-miles—GTMs—shown by the red line below) has remained consistent.¹²





More granular data concerning operations on the legacy-KCS network buttress the conclusion that the operational picture is showing meaningful improvement. As shown in Figure 10 below, the number of cars shown in CPKC's IT systems as experiencing prolonged dwell times—often as a result of the data issues (such as difficulty mapping the locations of those cars) and fluidity problems post-Day N—has been down sharply in recent weeks. While still higher than acceptable, this trend reflects real progress in working through accumulated car inventories, and it will support near-term improvements in customer experience.

¹² The sharp drop in GTMs on May 3 reflected the planned operational shutdown in connection with the Day N transition.

FIGURE 10



Similarly, data shows that yard inventories across the legacy-KCS network have improved steadily in recent weeks. Figure 11 on the next page depicts yard inventories at six legacy-KCS yards. The horizontal lines show the average inventory level and range of variation (within one standard deviation) for the pre-Day N period, with the gray bars depicting average weekly inventory levels from late April to present. Each of the graphs reflects the run-up in yard inventories associated with the post-Day N problems, followed (in varying degrees) by trends back towards the normal inventory range.

FIGURE 11



The operating data presented above and the ground-level experience that underlies those metrics indicate real progress in the direction of normal operations, but they do not (yet) reflect success. CPKC understands the need for continued vigilance and unwavering attention to continued service remediation efforts to ensure against backsliding in performance levels.

CPKC will approach its continuing service remediation efforts mindful of the fact that the goal is to provide shippers with high-quality service, rather than focusing on matching any given pre-Day N metric. Metrics for the period leading up to Day N were somewhat better than usual because they reflected operational fine-tuning designed to enable CPKC to enter the brief Day N operational pause in a manner that caused the least disruption to customers' shipping patterns. In addition, as noted above, CPKC's post-Day N system metrics do not match exactly the legacy-KCS network metrics based on MCS, and certain performance metrics (such as FMLM performance) are now calculated differently than MCS calculated them. CPKC's service recovery efforts will be guided by the goal of serving customers well rather than necessarily generating metrics that match precisely pre-Day N, MCS-based performance measures on the legacy-KCS network.

III. CPKC WILL CONTINUE TO REPORT PROACTIVELY TO THE BOARD ABOUT ITS SERVICE RECOVERY EFFORTS AND PROGRESS

CPKC intends to continue proactive and open communications with customers and the Board regarding the progress of its service recovery efforts. In addition to the standard monthly reporting of service metrics in this docket, CPKC plans to report to the Board on a weekly basis for the duration of the present service issues. CPKC would file that report on each Wednesday, beginning on June 25, in order to provide updated information on the status of recovery efforts along with data on FMLM and Manifest OTP performance through the previous Friday.¹³ This additional reporting would of course be in addition to CPKC's ongoing and proactive communications directly with its customers, and CPKC reiterates that those customers should not hesitate to reach out to their account managers or customer service representatives about concerns or issues they need help addressing.

CPKC anticipates that it will continue this more frequent cadence of reporting until all of the service action plan metrics have been at least ten percentage points above the applicable service action plan triggers (*i.e.*, 86.0% for FMLM, 66.3% for Manifest OTP) for at least four consecutive weeks.

¹³ This timing is consistent with the timing for submission of data in Ex Parte No, 724 and Ex Parte No. 711 (Sub-No. 2).

Respectfully submitted,

a f Mg

David L. Meyer LAW OFFICE OF DAVID L. MEYER 1105 S Street N.W. Washington, D.C. 20009 Email: David@MeyerLawDC.com Telephone: (202) 294-1399

CANADIAN PACIFIC KANSAS CITY LIMITED Cassandra P. Quach 7550 Ogden Dale Road S.E. Calgary, AB T2C 4X9 Canada Email: Cassandra.Quach@cpkcr.com

Nizam Hasham 1290 Central Parkway West, Suite 800 Mississauga, ON L5C 4R3 Canada Email: Nizam.Hasham@cpkcr.com

Telephone: (888) 333-6370

Telephone: (816) 983-1387

THE KANSAS CITY SOUTHERN RAILWAY COMPANY David C. Reeves 427 West 12th Street Kansas City, MO 64105-1403 Email: David.Reeves@cpkcr.com

Attorneys for CPKC

June 20, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing CPKC's June 2025 Report on Service Action Plan to be served electronically or by first class mail, postage pre-paid, on all parties of record in this proceeding.

> /s/ David L. Meyer David L. Meyer

June 20, 2025