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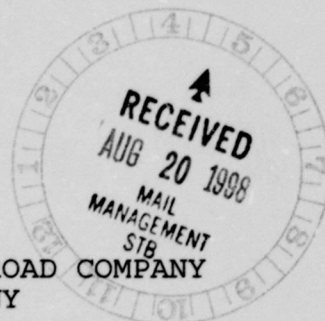
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Public Record

BEFORE THE  
SURFACE TRANSPORTATION BOARD

UP/SP-351

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY  
-- CONTROL AND MERGER --  
SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY  
COMPANY, SPCSL CORP. AND THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY



APPLICANTS' REPLY TO BNSF'S  
PETITION FOR ENFORCEMENT OF MERGER CONDITION

Applicants UPC, UPRR and SPR<sup>1/</sup> hereby reply to BNSF's petition seeking the Board's determination that South Texas Liquid Terminal, Inc. ("STL Terminal"), is a transload facility within the switching limits of San Antonio to which BNSF was granted access under the UP/SP-BNSF settlement agreement and the conditions the Board imposed on the UP/SP merger. The factual information herein is verified by John H. Ransom, UP's Manager-Interline Marketing.

In its latest effort to expand its rights under the settlement agreement, BNSF has dispensed with the "public interest" guise that it has regularly adopted and the Board

<sup>1/</sup> Acronyms used herein are the same as those in Appendix B of Decision No. 44. The following original Applicants have been merged with UPRR: MPRR (on January 1, 1997); DRGW and SPCSL (on June 30, 1997); SSW (on September 30, 1997); and SPT (on February 1, 1998). For simplicity, and in light of the fact that SPT has merged with UPRR and no longer has any separate existence, we generally refer to the combined UP/SP rail system herein as "UP."

has regularly rejected. Here, BNSF does not argue, as it has in previous instances, that the access is required in order to remedy the loss of pre-merger competition between UP and SP. Contrast Decision No. 77, served Jan. 7, 1998 (rejecting BNSF's argument that New Orleans-area shippers were "2-to-1" shippers).<sup>2/</sup> Nor does BNSF argue, as it has on prior occasions, that access to STL Terminal's additional volumes is necessary for BNSF to compete effectively using its trackage rights. Contrast Decision No. 74, served Aug. 29, 1997, p. 5 n.17 (rejecting BNSF's traffic density argument).

Instead, here, BNSF is presenting the Board with a simple contract dispute. BNSF's argument is that, when it entered into the UP/SP-BNSF settlement agreement, it had reason to believe that STL Terminal was within the scope of the access for which it bargained, and it is asking the Board to "preserve [its] reasonable expectations." Petition, p. 12.<sup>3/</sup>

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<sup>2/</sup> See e-mail from P. Rickershauser (BNSF) to L. Gaeta (UP), Apr. 28, 1998 (Exhibit A hereto) ("BNSF is not claiming this facility is either a '2-to-1' shipper facility, or a new transload facility located along a trackage rights line.").

<sup>3/</sup> UP is waiving the arbitration provision of the UP/SP-BNSF settlement agreement and responding to BNSF's petition, but is doing so without prejudice to its right to insist on arbitration of other disputes that may arise regarding the agreement. UP suggests that any further disputes of this type should be arbitrated, rather than brought before the Board.

The facts, however, demonstrate that STL Terminal was not within the scope of BNSF's bargained-for access and that BNSF had no reason to believe otherwise.

I. BACKGROUND

As part of the UP/SP-BNSF settlement agreement, BNSF gained the right to serve existing transloads at specified "2-to-1" points, including San Antonio, Texas. See Second Supplement Agreement § 3(b) (amending Settlement Agreement § 4(b)). The scope of BNSF's access was further defined by Section 9(g) of the settlement agreement, which provides that locations referenced in the settlement agreement "include all areas within the present designated switching limits of the location."

When BNSF entered into the settlement agreement, two Items in Supplement 149 to Tariff MP 8170-C purported to describe San Antonio switching limits. First, Item 2649.10 described the limits as (a) between Milepost 255.97 on the north and Milepost 267.80 on the south, with the mileposts computed with reference to Palestine, Texas; and (b) between San Antonio on the north and Milepost 4.1 of UP's Corpus Christi line on the south. Second, Item 2650 described the limits as between Milepost 1028.55 on the north and Milepost 1038.5 on the south. See Supplement 149 to Tariff MP 8170-C, p. 98 (Exhibit B hereto).



At the time of the settlement agreement, the second of these items was obsolete and of no further effect. Only Item 2649.10 remained relevant. UP no longer had any line near San Antonio with mileposts in the range described by Item 2650. That item was an obsolete reference to mileposts that had been used on the former Missouri-Kansas-Texas Railroad Company ("MKT") line between Houston and San Antonio. At least five years before the settlement agreement, the mileposts along the MKT line referenced by Item 2650 had been replaced. In late 1994, the mileposts were replaced and recalibrated a second time in order to correspond with the mileposts used on the former MP Palestine-San Antonio-Laredo line.<sup>4/</sup> New mileposts had been physically installed along the line, and these recalibrated mileposts were shown on the UP track charts that were in effect at the time of the settlement agreement. See Exhibit D (March 1995 track chart).

STL Terminal is located on the former MKT line north of San Antonio between Mileposts 254.40 and 254.00.<sup>5/</sup> In

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<sup>4/</sup> In late 1990, shortly after it acquired control of MKT, UP replaced the 4-digit milepost designations that appear in Item 2650 with 3-digit milepost designation, because UP's system could not process the 4-digit milepost numbers. See Exhibit C (December 1990 track chart). UP replaced and recalibrated the mileposts again in late 1994 so they would correspond with the mileposts on former MP Palestine line in order to facilitate double-track operations over the MP and MKT lines.

<sup>5/</sup> On Exhibit D, STL Terminal's location can be identified by the siding shown just north of Milepost 254.40. STL  
(continued...)

other words, STL Terminal is located outside of the San Antonio switching limits as defined by Item 2649.10 in Tariff MP 8170-C. BNSF, however, argues that its "reasonable expectations" entitle it to serve STL Terminal, since references to the replaced mileposts remained in UP's tariff, and since STL Terminal is located at a point that was within the definition of San Antonio switching limits under the superseded milepost system. But it is in fact clear that STL Terminal was not within San Antonio switching limits at the time of the BNSF settlement agreement, and that BNSF had no reasonable expectation that it was.

II. STL TERMINAL WAS NOT WITHIN THE SAN ANTONIO SWITCHING LIMITS AT THE TIME OF THE UP/SP-BNSF SETTLEMENT AGREEMENT

There can be no question that STL Terminal was not within the San Antonio switching limits as defined by the UP tariff in effect at the time of the UP/SP-BNSF settlement agreement. BNSF argues that STL Terminal is located between former Mileposts 1028.55 and 1038.5, and thus falls within the San Antonio switching limits as defined by Item 2650 of the UP tariff. But the fact that the land on which STL Terminal is now located was between those mileposts at one time well before the settlement agreement is irrelevant. The question

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<sup>2/</sup> (...continued)

Terminal is located adjacent to an industry track that branches off the siding. STL Terminal moved to its present location in the early 1990s, after UP had recalibrated the MKT mileposts for the first time.



is whether STL Terminal was located between those two mileposts at the time of the BNSF settlement agreement. It was not: those mileposts were no longer in existence at that time.

At least five years before the parties entered into the settlement agreement, UP replaced and recalibrated the mileposts along the former MKT line on which STL Terminal is located. Under the milepost system as it existed at the time of the settlement agreement, and as it exists today, STL Terminal is located between Mileposts 254.40 and 254.00, which places it outside San Antonio switching limits as defined by Item 2649.10 of Tariff MP 8170-C.

BNSF does not dispute that UP replaced the mileposts on the former MKT line prior to the BNSF settlement agreement. Nor does BNSF dispute that these changes were entirely proper and done in the ordinary course of business. BNSF argues only that, because an obsolete reference to the former MKT mileposts remained in UP's tariff, the Board must define the San Antonio switching limits by reference to those superseded and obsolete mileposts.

BNSF's position makes no sense. There simply was no UP line corresponding to the mileposts in Item 2650 in the vicinity of San Antonio at the time of the settlement agreement. BNSF makes much of the fact that the item was not removed from UP's tariff until June 1998, but the Board has

recognized that tariffs often contain items that have, through changes in circumstances, become obsolete and inoperative. See, e.g., Allied Corp. v. Union Pacific R.R., 1 I.C.C.2d 480, 484 (1985), aff'd, 779 F.2d 41 (3d Cir. 1985); Docket No. 40298, Society of the Plastics Industry, Inc. v. Consolidated Rail Corp., Decision served Oct. 22, 1990, p. 2 n.6. This is simply one such item.

The facts are clear that STL Terminal was not located between Mileposts 1028.55 and 1038.5 at the time of the settlement agreement. STL Terminal's location at that time was confirmed unambiguously by both the physical mileposts and track charts in existence at that time.

The facts are also clear that STL Terminal was not located between Mileposts 255.97 and 267.80, and thus it was not located within the San Antonio switching limits at the time of the settlement agreement.<sup>5/</sup>

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<sup>5/</sup> BNSF suggests (pp. 4-5) that Item 2649.10 cannot be read to establish switching limits on the former MKT line. BNSF suggests that it applies only to the former MP line that runs through Palestine, Texas, because the tariff item refers to "Palestine." But the tariff item does not state that it applies only to the MP line. It simply indicates that Palestine was the base point for computing the mileposts. As explained above, when the mileposts along the former MKT line were replaced, the new mileposts were computed with reference to Palestine in order to correspond with the mileposts on the former MP line so that the two lines could be operated as double track.

III. WHEN IT ENTERED INTO THE SETTLEMENT AGREEMENT, BNSF HAD NO REASON TO BELIEVE THAT STL TERMINAL WAS WITHIN THE SAN ANTONIO SWITCHING LIMITS

BNSF's main argument for access to STL Terminal is based on preserving its "reasonable expectations" when it entered into the settlement agreement. But BNSF could not have reasonably expected, upon entering into the agreement, that it had received access to STL Terminal.

BNSF does not claim that it developed a "reasonable expectation" of access to STL Terminal based on any investigation it performed prior to entering into the settlement agreement. That alone should foreclose this line of argument. But even if BNSF had undertaken a reasonable investigation, it would have quickly discovered that STL Terminal was outside the San Antonio switching limits.

A. Any Reasonable Investigation Would Have Revealed That STL Terminal Was Not Within the San Antonio Switching Limits

If BNSF had wanted to undertake a reasonable investigation before entering into the settlement agreement to determine whether STL Terminal was within the San Antonio switching limits as defined by the UP tariff in effect at that time, it would have been a simple process. BNSF could have determined STL Terminal's location by (a) asking UP; (b) physically visiting the site; (c) consulting UP's track charts; or (d) asking STL Terminal. Any of those methods would have led to the same conclusion:



- If BNSF had asked UP, UP would have said that STL Terminal was located between Mileposts 254.40 and 254.00, because those are the mileposts shown on UP's trackage charts and physically located on the line.
- If BNSF had physically examined the former MKT line to determine where STL Terminal was located, it would have been able to see, from the mileposts in physical place along that line, that STL Terminal was located between Mileposts 254.40 and 254.00.
- If BNSF had consulted UP's track charts, it also would have discovered that STL Terminal was located between Mileposts 254.40 and 254.00.
- And if BNSF had asked STL Terminal where it was located, STL Terminal would have told BNSF it was located between Mileposts 254.40 and 254.00. That is what STL Terminal told BNSF when it did ask.<sup>2/</sup>

BNSF could then have reviewed the UP switching tariff in effect. It would have learned that the San Antonio switching limits were defined as from Milepost 255.97 on the north to Milepost 267.80 on the south, and it would have quickly concluded that STL Terminal was not within the switching limits. Moreover, had BNSF asked, either before or after it conducted its investigation, about the tariff item referring to Mileposts 1028.55 and 1038.5, UP would have explained that it was an obsolete reference to mileposts that

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<sup>2/</sup> See Letter from P. Rickershauser (BNSF) to J. Ransom (UP), May 15, 1998 (Exhibit E hereto). This also demonstrates that STL Terminal could not have formed a reasonable expectation that BNSF would gain access as a result of the settlement agreement.

had been replaced, which BNSF's own investigation would have confirmed.

B.    The Course of the Dispute Between BNSF and UP  
Demonstrates That BNSF Was Not Misled by the  
Obsolete Tariff Item

It is thus clear that a reasonable investigation would not have led BNSF to develop an expectation that it had gained access to STL Terminal as a result of the settlement agreement. It is equally clear that BNSF never in fact formed such an expectation. The course of correspondence between BNSF and UP demonstrates that the obsolete tariff item simply supplied BNSF with a last-resort argument and did not form the basis for any "reasonable expectations."

1.    BNSF's Alleged Reliance on UP's Oral Advice

The STL Terminal issue arose when BNSF was incorrectly informed that the shipper was within the San Antonio switching limits. That BNSF initially received incorrect information was unfortunate, but as BNSF notes (Petition, p. 6), it was well aware that STL Terminal was never included in any written lists of shippers accessible to BNSF as a result of the settlement agreement provided by UP. Moreover, BNSF's efforts to clarify whether it had access to STL Terminal demonstrate its recognition that written confirmation was necessary before a shipper could be considered open to BNSF service. Nonetheless, when BNSF realized that UP did not intend to include STL Terminal on its



list of shippers accessible by BNSF, BNSF's first argument that it was entitled to access was based on UP's oral advice. See e-mail from F. Colby (BNSF) to L. Gaeta (UP), Aug. 12, 1997) (Exhibit F hereto) & e-mail from E. Pidgeon (BNSF) to L. Gaeta (UP), Feb. 4, 1998 (Exhibit G hereto).

In its Petition (p. 6), BNSF notes that it included STL Terminal in its list of accessible shippers based on the oral advice it received from UP. But BNSF surely understands that its simple listing of shippers as open to access does not make them open, and that UP is not estopped from timely correcting erroneous oral advice. Prior to petitioning the Board for access to New Orleans-area shippers served by UP and SP, BNSF had included a long list of such shippers in its submission to the Board of facilities purportedly open pursuant to the settlement agreement. See, e.g., BNSF-PR-5, Att. 9. Nonetheless, BNSF did not argue in that case, and cannot seriously argue here, that those submissions carried any evidentiary weight. BNSF cannot expand its access simply by listing shippers as open.

2. BNSF Next Relied on a Misunderstanding  
of the Reason It Was Able to Access a  
Different Shipper

After UP made clear its position that STL Terminal was in fact outside the switching limits of San Antonio, BNSF developed a second line of argument. In an e-mail from BNSF's Peter Rickershauser to UP's Linda Gaeta, Mr. Rickershauser

argued that because a different shipper was located further out from the center of San Antonio than STL Terminal, and UP had agreed that BNSF could access that shipper, the San Antonio switching limits must encompass STL Terminal. See Exhibit A.

UP's response to this second argument was straightforward: BNSF gained access to the shipper in question because it was a genuine "2-to-1" shipper, not because it was within the San Antonio switching limits. See e-mail from J. Ransom (UP) to P. Rickershauser (BNSF), May 7, 1998 (Exhibit H hereto).<sup>2/</sup> In fact, the tariff that BNSF relied upon to establish that the shipper in question was open to reciprocal switching specifically listed that shipper, but not STL Terminal. See Supplement 149 to Tariff MP 8170-C, p. 26 (Exhibit I hereto). Moreover, as Mr. Ransom explained, UP's switching limits are defined by the mileposts in its tariff, not with reference to the most distant shipper open to reciprocal switching. The fact that MKT had opened the other shipper to reciprocal switching for MP and SP, in a decision

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<sup>2/</sup> In response to Mr. Rickershauser's comment that BNSF had included STL Terminal in several lists of accessible shippers it had filed with the Board, Mr. Ransom pointed out that STL Terminal was not on any lists generated by UP, and that UP did not have the resources to review every list of shippers that BNSF submitted to the Board.

specific to that shipper, did not have the effect of opening STL Terminal as well.<sup>2/</sup>

In its Petition (pp. 10-11), BNSF halfheartedly pursues the argument that, because BNSF was granted access to this other shipper, it follows that STL Terminal is within the San Antonio switching limits. BNSF argues (p. 11) that the "only conceivable basis for BNSF's access" to the other shipper is that "as of September 25, 1995, it was a '2-to-1' shipper located within the switching limits of San Antonio." As explained above, BNSF is half right: BNSF gained access to the other shipper because it was a "2-to-1" shipper -- it had access to UP and SP and no other railroad before the merger -- but not because it was a transload facility located within the switching limits of San Antonio.

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<sup>2/</sup> As UP has explained in other contexts, see Applicants' Reply to BNSF's Petition for Clarification (UP/SP-330), Dec. 4, 1997, pp. 19-20, & Van Kampen V.S., pp. 1-2, opening a shipper to reciprocal switching involves agreements and trade-offs with other railroads. In this context, it is important to distinguish reciprocal switching from the switching limits found in UP's tariffs.

BNSF perhaps misunderstands the situation because its method of defining switching limits differs from UP's. See Tariff BNSF 8005, Item 180, issued June 11, 1997, p. 13 ("Except as otherwise provided herein, the switching limits of the BNSF will be confined to the most distant industry listed from the point of interchange with connections shown within the station.") (Exhibit J hereto). UP's Mr. Ransom pointed out this difference as a possible source of BNSF's confusion in an e-mail to BNSF's Mr. Rickershauser. See Exhibit II.



3. BNSF Turned to the Obsolete Tariff Item Only  
After Its Previous Arguments Had Failed

Only after BNSF's first two arguments had failed did BNSF's Mr. Rickershauser resort to the tortured argument for access that BNSF now asks the Board to accept. See Exhibit E. As Mr. Rickershauser admitted at the time, BNSF had not been able to find a UP line with Mileposts between 1028.55 and 1038.5 in the San Antonio area. When asked, STL Terminal told BNSF it was located between Mileposts 254.4 and 254.1. It was only after unearthing a 1976 MKT timetable that BNSF was able to determine that at one time STL Terminal's location had been between Mileposts 1028.55 and 1038.5.

IV. BNSF'S SUGGESTED SOLUTION WOULD CONFUSE RATHER THAN  
CLARIFY ACCESS ISSUES AND WOULD UNDULY BURDEN UP

BNSF argues (p. 12) that the Board must give meaning to obsolete tariff items because otherwise, "the burden will fall on BNSF to do the field work, with UP and SP tariffs in hand, in order to match up existing mile posts with the mile posts listed in published tariffs, and, then to seek to reconcile mile post disparities with UP." Colby V.S., pp. 9-10. As explained below, Mr. Colby in fact describes the difficult and time-consuming process that would result if the Board were to grant BNSF's petition.

BNSF also argues (p. 12) that the Board should require UP to provide a list of switching limits for all "2-to-1" points as set forth in UP tariffs, along with copies of

those tariffs, and impose a continuing duty on UP to provide BNSF with lists of any changes to mileposts defining the switching limits. As explained below, such requirements would be unduly burdensome and are completely unnecessary.

A. BNSF's Proposal Would Generate Confusion  
Rather Than Eliminate It

As demonstrated above, the process for determining which shippers are within the switching limits of locations designated as "2-to-1" points should be simple. First, one would determine, by reference to track charts or the mileposts themselves, at which milepost a shipper is located. Second, one would look to the UP tariff in existence at the time of the settlement agreement and determine whether the milepost falls within the defined switching limits. This process would work despite the existence of obsolete tariff items (they would be properly ignored), and this is the process that would ensure that everyone's reasonable expectations are met.

If BNSF's position that obsolete tariff items must be given meaning were accepted, two negative consequences would follow: (1) BNSF would gain access to shippers who were not, in fact, within the switching limits of a "2-to-1" location at the time of the settlement agreement; and (2) BNSF could only gain access only after "reconcil[ing] milepost disparities" resulting from obsolete tariff items -- the same confusing process that BNSF followed here. Moreover, BNSF's process depends on the availability of ancient records, such



as the 1976 MKT timetable that BNSF unearthed, to show where a shipper was located under a superseded milepost system.

BNSF is proposing an impractical rule that might favor it on this one occasion, but that would lead to costly and unnecessary disputes in the future.

B. BNSF's Proposal That UP Provide and Update Information on Switching Limits Would Unduly and Unnecessarily Burden UP

BNSF's request that the Board order UP to supply a list of switching limits and to continually update the list is based on the claim that the present situation will lead to instances of "UP-fostered uncertainty." Petition, p. 11. As shown above, however, BNSF manufactured the only "uncertainty" in the present situation. Moreover, such a requirement that UP sort through all of its existing tariffs would be incredibly burdensome and completely unnecessary. BNSF has access to all of these tariffs. Moreover, BNSF points to no other specific access disputes that would justify this exercise, nor does it claim that its ability to bring the present Petition was hampered because it was unable to obtain the relevant UP tariff.

UP has consistently acted in good faith to comply with the terms of the UP/SP-BNSF settlement agreement and the merger conditions imposed by the Board. See Finance Docket No. 32760 (Sub-No. 21), Decision No. 11, served Jan. 21, 1998, p. 3 ("BNSF has not shown that there have previously been any

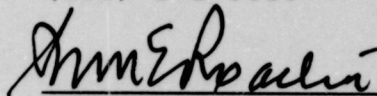


problems resolving such disputes, nor has it shown that UP has a track record of arbitrarily refusing to admit that particular shippers are 2-to-1 shippers."). The fact that only one dispute about switching limits has reached the Board in two years is a further testament to this good faith. If a dispute about switching limits arises and BNSF does not have access to the relevant UP tariffs, UP will of course provide BNSF whatever it can locate. There is no reason to impose additional requirements.

Respectfully submitted,

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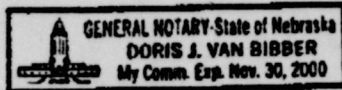
Attorneys for Union Pacific  
Corporation, Union Pacific  
Railroad Company and Southern  
Pacific Rail Corporation

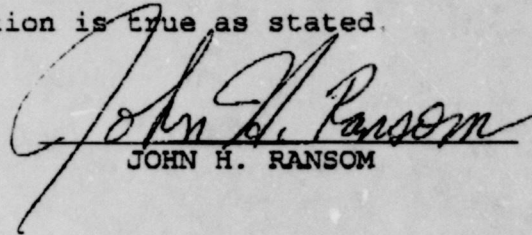
August 20, 1998

VERIFICATION

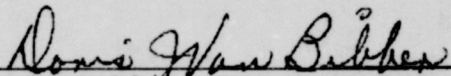
STATE OF NEBRASKA     )  
                              ) ss.  
COUNTY OF DOUGLAS    )

I, John H. Ransom, Manager-Interline Marketing of Union Pacific Railroad Company, state that I have reviewed the information that is presented in Applicants' Reply to BNSF's Petition for Enforcement of Merger Condition (UP/SP-351), that I am familiar with the information, and that to the best of my knowledge and belief the information is true as stated.



  
JOHN H. RANSOM

SUBSCRIBED and sworn to before me  
by John H. Ransom this 20th day of  
August, 1998.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

*Nov. 30, 2000*

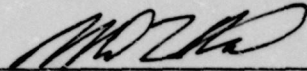


CERTIFICATE OF SERVICE

I, Michael L. Rosenthal, certify that, on this 20th day of August, 1998, I caused a copy of the foregoing document to be served by first-class mail, postage prepaid, or by a more expeditious manner of delivery, on all parties of record in Finance Docket No. 32760, and on

Director of Operations  
Antitrust Division  
Suite 500  
Department of Justice  
Washington, D.C. 20530

Premarmer Notification Office  
Bureau of Competition  
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Michael L. Rosenthal

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Butch\_Grigone@notes.up.com@INTERNET (bcc: Peter J Rickershauser/MKT/RAD/US)  
Subject: Re: South Texas Liquid Terminals - San Antonio, Texas

Linda, reference your note attached to Ed Pidgeon of BNSF dated 4/21/98 concerning the above subject.

In reading your note, you advise UP will not permit BNSF access to this customer under any of the merger conditions. I believe your information is in error, and request your reconsideration of BNSF ability to access this customer under the merger conditions as a "transload" facility.

BNSF is not claiming this facility is either a "2-to-1" shipper facility, or a new facility located along a trackage rights line. However, there appears little doubt that this facility is a transload facility accessible to BNSF at a "2-to-1" point, similar to the Ernest F. Mariani Co., in Salt Lake City, UT, which we reviewed in December and January.

Our review of the applicable UP reciprocal switch tariff, MP 8170-C (we checked supplement 149, page 26) shows The Fite Distribution Services Co. as being open to reciprocal switch in Group B for San Antonio, TX. Fite Distribution is served by the same line as South Texas Liquid Terminals and, located 1905 Shipman Avenue in San Antonio, is further out from the center of San Antonio than South Texas Liquid Terminals. Said differently, the fact that The Fite Distribution Services Co., is open to reciprocal switch established that South Texas Liquid Terminals is within the San Antonio reciprocal switch district. As a result, it appears South Texas Liquid Terminals falls within the description of Section 4b of the "BNSF Settlement Agreement", which states "BNSF shall receive access on such lines only to . . . (ii) any existing or future transloading facilities at points listed on Exhibit A of this Agreement, . . ." San Antonio, TX is listed on Exhibit A. South Texas Liquid Terminals is both within the San Antonio reciprocal switch limits and within the city limits of San Antonio, TX.

I have another concern here, however. Our records show on May 16, 1998 Bob Price advised Frank Colby verbally that South Texas Liquid Terminals in San Antonio, TX was a transload facility accessible to BNSF. After receiving a UP list of shipper facilities on July 9 and July 11, 1997 accessible to BNSF which did not include South Texas Liquid Terminals, on August 12 Frank Colby of BNSF addressed an electronic note to Linda Gaeta requesting South Texas Liquid Terminal be added to the list of shipper facilities accessible to BNSF as a transload. The next list we received from UP, on January 9, 1998, also did not include South Texas Liquid Terminals; our specific requests were not answered until the message below. In the meantime, we have listed South Texas Liquid Terminals, based on advice from UP received on May 16, 1997 in our quarterly filings to the STB of October 1, 1997, and January 2 and April 1, 1998.

In brief, BNSF believes that application of the BNSF settlement agreement terms as well as the STB merger conditions and subsequent decisions intend our access to South Texas Liquid Terminals, San Antonio, TX as a transload facility. Appreciate you either advising basis for your different interpretation in this matter, or your concurrence to our request.



IL CC A-503

SUPPLEMENT  
TO

ICC MP 8179-C



## MISSOURI PACIFIC RAILROAD COMPANY

SUPPLEMENT 149

TO

**TARIFF MP 8170-C**

(Cancels Supplements 78, 89, 127, 134, 135, 136, 137, 138, 146 and 148)

Supplement 149 and Special Supplements shown on page 2 herein contain all changes.

### LOCATION OF NEW OR CHANGED ITEMS

The latest complete list of all new or changed items in effective Supplements is published in this Supplement.

ABSORPTIONS OF SWITCHING AND OTHER TERMINAL CHARGES

AND

ALLOWANCES

AT STATIONS

ON

**MISSOURI PACIFIC RAILROAD  
DONIPHAN, KENSETT & SEARCY RAILWAY**

(Except as Noted in Item 325)

THIS TARIFF APPLIES ON INTRASTATE TRAFFIC IN THE STATES OF ARKANSAS, COLORADO, ILLINOIS, KANSAS, LOUISIANA, MISSOURI, NEBRASKA, OKLAHOMA, TENNESSEE (MEMPHIS) AND TEXAS.

### SWITCHING TARIFF

ISSUED OCTOBER 17, 1994

EFFECTIVE DECEMBER 2, 1994

K. H. SCHROEDER  
Manager, Franch Services  
Omaha, Nebraska

Issued by  
G. OSLER  
Publishing Officer  
1418 Dodge St.  
Omaha, Nebraska 68179

(D.W.C.)

**SECTION 5**  
**DEFINITION OF SWITCHING LIMITS**

ITEM	STATION	POINTS FROM WHICH MILE POST LOCATION SHOWN HEREIN IS COMPUTED	FROM MILE POST DIRECTION	TO MILE POST DIRECTION
(41) 2549 04	Ratcliff ..... TX (OO-2929)	Haringen ..... TX	59.3 on north .....	60.3 on south.
(41) 2549 05	Refugio ..... TX (OO-2929)	Brownsville ..... TX	190.4 on north .....	180.8 on south.
(41) 2549 06	Rio Grande City TX (OO-2929)	Haringen ..... TX	Switching limits extend to 72.0 on north.	
(41) 2549 07	Riverside ..... TX (OO-2929)	Palestine ..... TX	69.9 on north .....	72.2 on south.
(41) 2549 08	Selter ..... TX (OO-2929)	Pt Worth ..... TX	155.2 on north .....	156.5 on south.
(41) 2549 09	Sam Fordyce ... TX (OO-2929)	Haringen ..... TX	52.8 on north .....	55.4 on south.
(41) 2549 10	San Antonio ... TX (OO-2929)	Palestine ..... TX	255.97 on north .....	267.80 on south.
		San Antonio ..... TX	On Corpus Chris line extends to	4.1 on south.
ITEM	STATION	BETWEEN MILE POST (Except as noted)		AND MILE POST (Except as noted)
(41) 2550	San Antonio ... TX (OO-2929)	Mile Post 1026.55 on the north .....		Mile Post 1036.5 on the south.
ITEM	STATION	POINTS FROM WHICH MILE POST LOCATION SHOWN HEREIN IS COMPUTED	FROM MILE POST DIRECTION	TO MILE POST DIRECTION
(41) 2550 01	San Jose ..... TX (OO-2929)	San Antonio ..... TX	5.9 on north .....	7.2 on south.
(41) 2550 02	San Juan ..... TX (OO-2929)	Haringen ..... TX	A 28.90 on north .....	A-29.80 on south.
		Raymondville ..... TX	Edinburg Line .....	E-37.80 on south.
ITEM	STATION	BETWEEN MILE POST (Except as noted)		AND MILE POST (Except as noted)
(41) 2550 03	Seely ..... TX (OO-2929)	Mile Post 1034.9 on the north .....		Mile Post 1036.18 on the south.
(41) 2550 04	Service ..... TX (OO-2929)	Mile Post 793.42 on the north .....		Mile Post 794.42 on the south.
(41) 2550 28	Sherman ..... TX (OO-2929)	Mile Post 663.3 on the north .....		Mile Post 666.11 (End of Line).



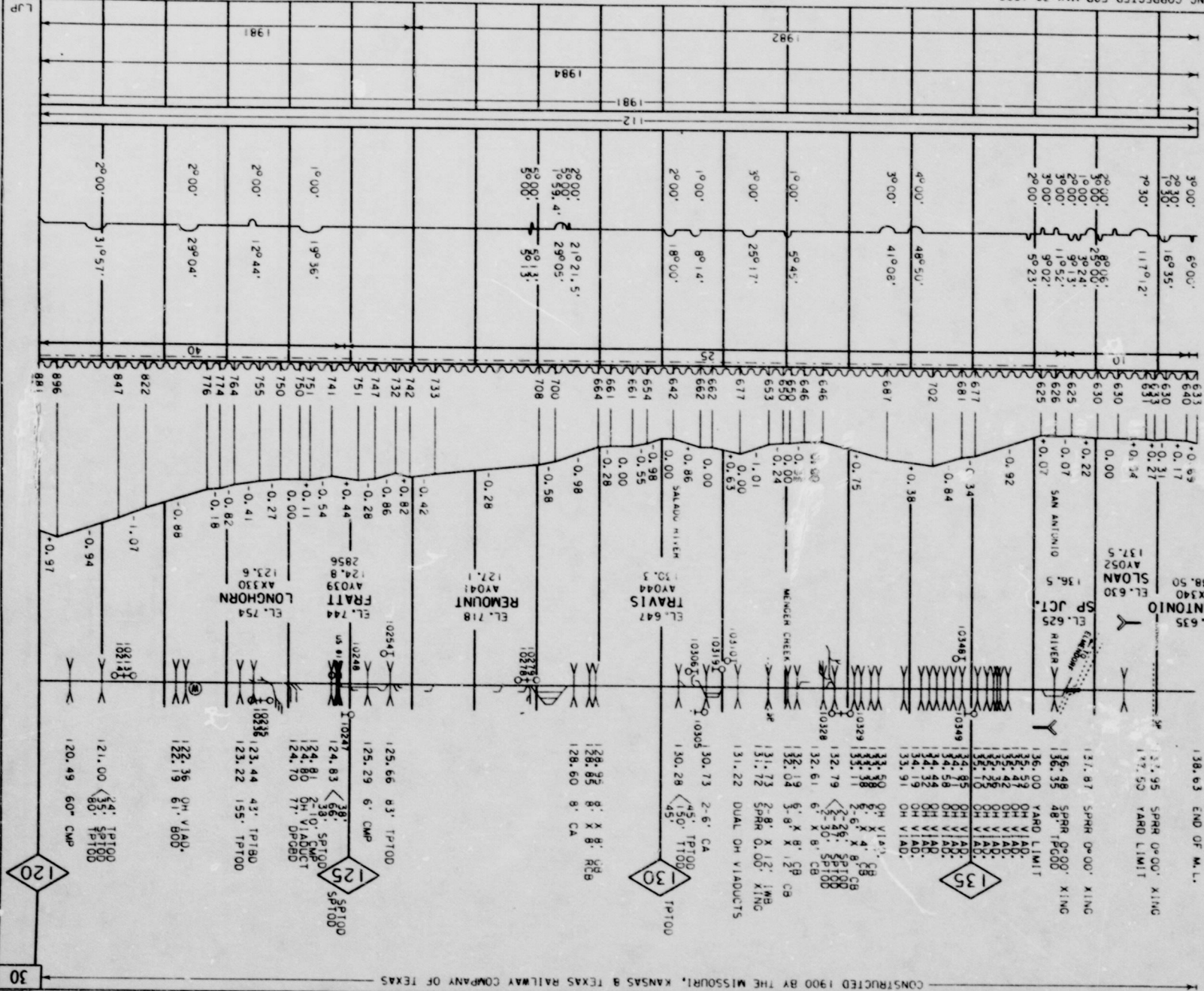
MOBILE-TEL. STA. NAME RANGE M.P. LOCATION M.P.

YARD LIMIT DRAG, EXPT. DET. HOT BOX DET. SPR. SW. INT. SIG. NO. ABSOLUTE SIG. HIGH WIDE TEMP. WIND GAGE HIGH WATER DET. TOPOGRAPHY ELEV. TOP OF RAIL AT STATION M.P. CONTROL POINTS B STATION NAMES CIRCULAR NUMBER MILE POST LOCATION (GTH CLEAR) OF SIDING MAX. GRADE PERCENT (1/8" GRADE) SLIDE WARNING EL. ABOVE SEA LEVEL FIBER OPTICS C.T.C. SPEED ALLOWANCE AUTH. SUPER ELEV. TOTAL ANGLE ALIGNMENT & FLANGE LUBRICATORS DEGREE OF CURVE RAIL SURFACING & LINING THE GANG

RAIL, SURFACING & LINING AND THE GANG CORRECTED FOR MAY 30, 1988

ALIGNMENT & PROFILE CORRECTED FOR DECEMBER 4, 1990

NEBR



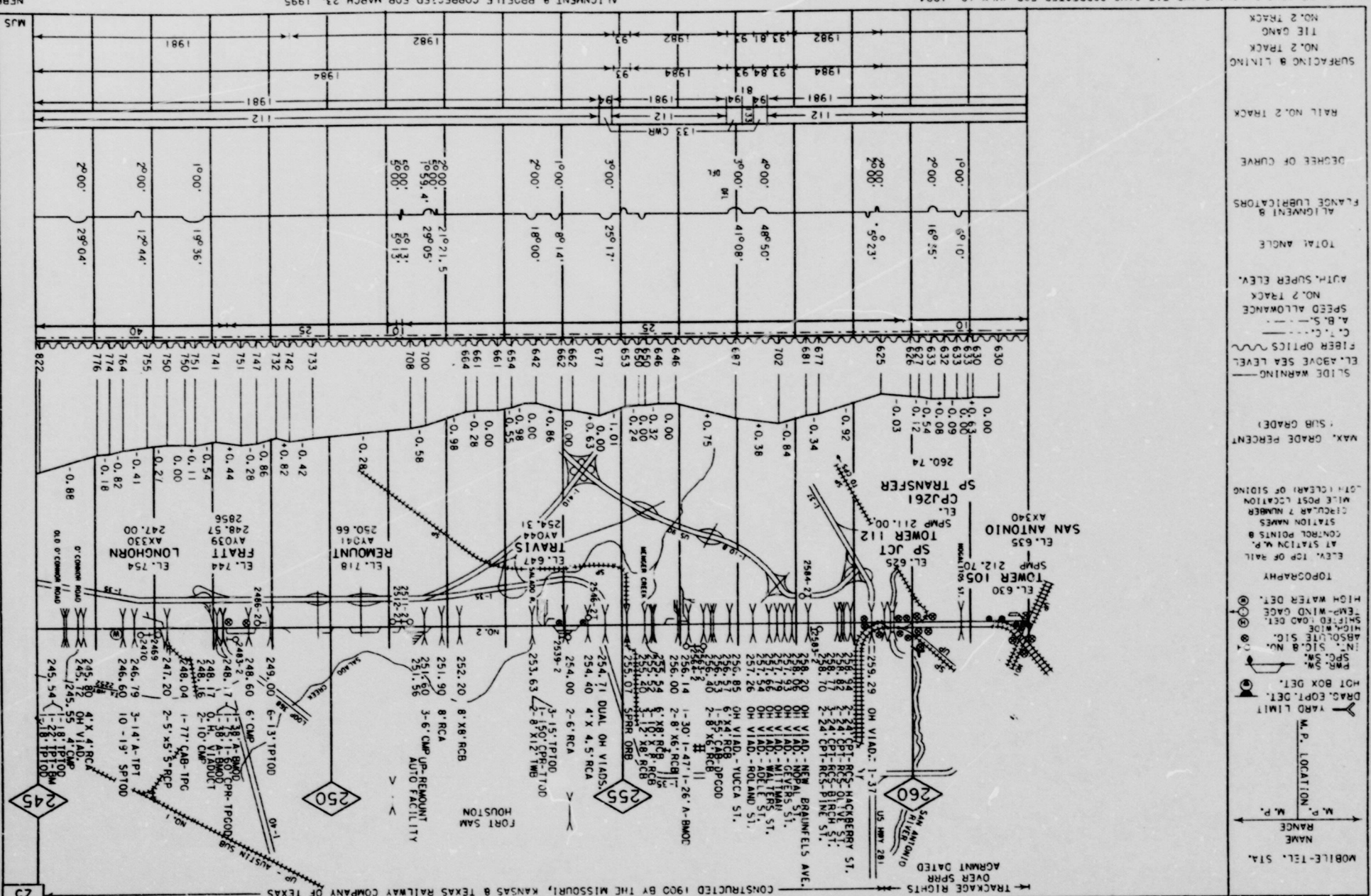
CONSTRUCTED 1900 BY THE MISSOURI, KANSAS & TEXAS RAILWAY COMPANY OF TEXAS

30



SOUTHERN PACIFIC LINES - SAN ANTONIO DIVISION  
DEL RIO SUBDIVISION - DEL RIO LINE

SAN ANTONIO DIVISION  
AUSTIN SUBDIVISION



RAIL, SURFACING & LINING AND TIE GANG CORRECTED FOR JULY 18, 1994  
ALIGNMENT & PROFILE CORRECTED FOR MARCH 23, 1995

NEBR

**BNSF****PETER J. RICKERSHAUSER**  
Vice President UP/SP Lines & Mexico**Burlington Northern Santa Fe**2650 Lou Menk Drive  
P.O. Box 961065  
Fort Worth, TX 76161-0665  
817.352-6666  
Fax 817.352-7154

May 15, 1998

Mr. John Ransom,  
Senior Interline Marketing Officer  
Union Pacific Railroad  
1416 Dodge Street  
Omaha, NE 68179

Dear John:

Reference your Internet message of May 7, 1998 concerning Burlington Northern Santa Fe access to South Texas Liquid Terminals in San Antonio. After reviewing your note and the information you provided, and reviewing our available data, I continue to conclude that application of the terms of the BNSF Settlement Agreement as well as the merger conditions and subsequent Surface Transportation Board decisions permit BNSF access to this facility.

Your message states:

"UP agrees that South Texas Liquid Terminals is a transload facility, but it is located at Travis, TX, which is a separate rail station distinct from San Antonio. Travis is not a "2-to-1" location. It is UP's opinion that the geographical boundaries of "2-to-1" stations are defined by the switching limits for that station. This is the only consistent definition of "San Antonio" over the life of the Settlement Agreement. In fact, UP's switching limits are shown in former tariff MP 8170-C, Supplement 149, page 98. M.P. 255.97 sets the outer limit of the switching district, and it is nearly two miles closer to San Antonio than South Texas Liquid Terminals."

UP's San Antonio switching limits are indeed contained in Supplement 149, MP Tariff 8170-C, Items 2649.10 and 2650, on page 98. The "definition of switching limits" in fact encompasses three UP (not SP) lines in the San Antonio area:

The "Palestine" line, former MP, from MP 255.97 on the north to 267.80 on the south  
The "Corpus Christi" line, former MP, from intersection with the "Palestine" line to MP 4.1 on the south

A third line, which is the former MKT line, from MP 1028.55 on the north to MP 1038 on the south

South Texas Liquid Terminals is located in the former MKT Travis Yard facility, MP 254.31.

In reviewing employees' timetables for Union Pacific as well as the former Missouri Pacific and Missouri-Kansas-Texas railroads, it is evident that reference to MP 255.97 to MP 267.80, as shown in Item 2649.10, refers to the MP line (the former Austin Subdivision of the Palestine



Mr. John Ransom  
May 15, 1998  
Page 2

Division), and that reference to MP 1028.55 to MP 1038.5 refers to the MKT line. I am attaching copy of Page 21 from MKT System Timetable No. 3, dated October 31, 1976, wherein you will note MP 1038.5 as shown in Supplement 149, MP Tariff 8170-C, Item 2650 corresponds exactly to the MKT's "end of track" in San Antonio.

This same MKT timetable page establishes Travis at Milepost 1030.3, which is between MP 1028.55 and MP 1038.5 as shown in Item 2650, Supplement 149, MP Tariff 8170-C. Therefore, under the application of the item, Travis and South Texas Liquid Terminals are within the reciprocal switching limits of San Antonio. This is borne out by the fact that Item 190, MP 8170-C, page 5, shows The Fite Distribution Services Co. as being open to reciprocal switch; Fite is located at 1905 Shipman Avenue in San Antonio, is served off the same line, and is between Travis and MP 1028.55. If Fite is within the reciprocal switching limits of San Antonio, and it appears to be, than South Texas is, as well.

The picture was still confusing to us, however, inasmuch as South Texas advised their milepost location as between MP 254.4 and 254.1, until we determined that UP had replaced the former MKT mileposts with new mileposts calibrated to the former MP mileages - which makes sense, given that the MKT route is severed north of San Antonio. However, Item 2650 of MP Tariff 8170-C continues to define the reciprocal switching limits of San Antonio by using the MKT mileposts. Travis and South Texas Liquid Terminals are clearly within the defined reciprocal switch limits contained in the tariff governing, based on the miles shown.

Based on this information, and your review of the attachments, I request you reverse your previous decision and affirm that BNSF is entitled to access to South Texas Liquid Terminals, a transload within the reciprocal switch limits of San Antonio as defined by the applicable tariffs in effect at the time of the "BNSF Settlement Agreement."

Sincerely,

*Pete Riekershauser*  
PR

Attachment

cc: Larry Wzorek  
Mike Roper  
Edward Pidgeon

Author: Frank R Colby at CFW05PO  
Date: 8/12/97 2:06 PM  
Priority: Normal  
TO: lmgacta@notes.up.com at Internet  
TO: Frank R Colby  
BCC: Edward E Pidgeon  
Subject: South Texas Liquid Terminal, San Antonio, TX  
----- Message Contents -----

Linda:

I don't think I have asked you about this one. Sorry if it is a duplicate. Bob Price advised 5/16/97 that the following customer is a transload facility and would be added to the UP list as such.

South Texas Liquid Terminal  
3131 N Panam Expwy  
San Antonio, TX

Please advise if any problem or if my UP list is just not up to date.

Thanks

Frank





Edward Pidgeon [BNSF.EPidgeon]@SSW on 02-04-98 12:59:00 PM

Please respond to Edward Pidgeon [BNSF.EPidgeon] @ SSW

To: lmgasta@notes.up.com@INTERNET, Frank Colby [BNSF.FColby]@SSW  
cc: Edward Pidgeon [BNSF.EPidgeon]@SSW (bcc: Peter J Rickershauser/MKT/RRO/US)  
Subject: UP/SP and BNSF differences on 2:1 listings

Hi Linda,

After going thru your Jan 9, 1998 spreadsheet and comparing it to ours, I originally found 18 customers that were listed on our spreadsheet that were not listed on yours. By catching up on some of the requests we had sent earlier, the original 18 is now down to only 14. I'll try to be as concise as possible so I don't give you a book to have to go thru. Here goes:

1. Sterling Paint Inc - Little Rock AR  
Quick background--Sterling Paint (subsidiary of Stebbins & Roberts Inc; P O Box 791; Little Rock AR 72203) bought the old Arkansas Broom Works facility at 1216 E 6th St and also bought out the companies of Cash Wholesale Co Inc and Sterling Everest Co, both of which were located at 1300 E 6th St. The 1216 E 6th St address has no trackage so is Not2:1 and you don't need to do anything with this address. However, the 1300 E 6th St. does not show on your spreadsheet under any name. Both of the old companies showed open on the MP on your 7-11-97 Tariff 'open to reciprocal' sheet but showed no address and "No Business Listing" under comments. PLEASE ADD STERLING PAINT INC 1300 E 6TH ST AS 2:1 OPEN ON UP.
2. Petro Source Asphalt Terminal - Elko NV  
Petro Source as 9801 Westheimer Rd is listed as 2:1 so no problem. However, Petro Source Asphalt Terminal at 1520 Silver St. is not listed. On 10-17, Bob Price sent us a ccMail confirming that this address is open; also per John Ransom's letter of 11-5, all industries at Elko served by industry tracks were opened to BNSF. PLEASE ADD 1520 SILVER ST AS 2:1.
- 3 and 4. Transwood Inc at Jayhawk Nv and at Redhouse Nv  
Both of these locations were part of the Kennecott Utah Copper discussions and were agreed upon that BNSF had access by Larry Wzorek of UPRR on 7-18-97. Also Jayhawk and Redhouse fall under John Ransom's letter. PLEASE ADD BOTH OF THESE CUSTOMER/LOCATIONS AS 2:1.
5. Rhone Poulenc, 3439 Park St., Baytown TX 77520  
On your 7-11 Tariff reciprocal list, this customer shows open on the MP with a TCS # 727474 and Duns# 82688896 but does not show on your Jan 9, 1998 list. PLEASE ADD AS 2:1.
6. City of Brownsville, City Abbatores Track, 1100 Roosevelt, Brownsville, TX 78521  
On your 7-11 Tariff reciprocal list, this customer shows open on the MP but does not show on your Jan 9, 1998 list. PLEASE ADD AS 2:1.

7. LCRA Plant - Halsted TX  
This shows as 2:1 on Exhibit A of Agreement but does not show on your list. PLEASE ADD AS 2:1
  8. Brown & Joiner; 821 W Jackson; Harlingen, TX  
This shows as open on MP on the 7-11 Tariff reciprocal list, but does not show on your Jan 9, 1998 list. PLEASE ADD AS 2:1.
  9. M G Building Materials; 227 New Laredo Hwy; Heafer TX  
Originally showed incorrect address of 9501 Hwy 81. THIS CORRECTED ADDRESS IS IN SAN ANTONIO SWITCHING DISTRICT AND SHOULD BE SHOWN AS 2:1. Frank shows a verbal agreement from the UPRR agreeing with this status on Aug 4, 1997. but UP spreadsheet doesn't show this company.
  10. Schulman Plant; Thomas St.; Orange TX 77680  
You show a Schulman Plant at 3007 Burnett as Jointly Served 2:1 No problem with that, however WE NEED THE 2ND ADDRESS OF THOMAS ST ADDED AS 2:1 ALSO.
  11. South Texas Liquid Terminal; 3131 N PanAm Expwy; San Antonio  
On 5-16-97, Bob Price agreed that this was a Transload facility but so far it hasn't shown up on any of your lists. As a follow-up, Frank sent a request on 8-12-97 to add. PLEASE ADD AS A TRANSLOAD FACILITY.
  12. Terra Nitrogen Corp (Terra Intl) - Waco TX  
This shows on 7-11 Tariff reciprocal list as open on SP with TCS# 12475 and Duns#174133702 but does not show on your Jan 9 list. PLEASE ADD AS 2:1.
  13. Terminal Freight Handling; 175 W 1300 South; Salt Lake City UT  
This shows on your 7-11 Tariff reciprocal list as being under customer name of Sears Logistics Servs Transp TRA and open on UP. However, the Sears Logistics address shows as 335 W Burgatti and being served by SL. I BELIEVE THAT TERMINAL FREIGHT HANDLING, 175 W 1300 SOUTH, IS ON THE UP AND NOT SL AND SHOULD SHOW AS 2:1 OPEN ON UP.
  14. This is the last one and I'm not sure if you need to do anything or not. Imperial Holly; 198 Kempner; Sugar Land, Tx shows on both of our lists as open on UP and 2:1. No problem so far.....However, A E Staley also operates on Imperial Holly property with the same address. We show Staley as also open on UP and 2:1, but you don't show them at all. Because they are operating at the same address as Imperial Holly, do you need to add them so there is no confusion with the operating people??
- Well, that's all I show so far. It looks to me like we've really been making progress lately on getting both lists to agree and I just want to thank you for all your efforts. If there is anything else you need, just let me know.

Thanks again

Ed



1  
Author: JHRANSOM@scz.skyway.com at Internet  
Date: 5/7/98 11:18 AM  
Priority: Normal  
TO: Peter\_J\_Rickershauser@RRD@scz.skyway.com at Internet  
CC: Edward E Pidgeon at CFW05PO  
CC: Regina C Minish at CFW07PO  
CC: Frank R Colby at CFW05PO  
CC: KHSCHROE@scz.skyway.com at Internet  
CC: LEWZOREK@scz.skyway.com at Internet  
CC: JHRANSOM@scz.skyway.com at Internet  
CC: RBPRICE@scz.skyway.com at Internet  
CC: MAHELLE@scz.skyway.com at Internet  
CC: BPGRIGON@scz.skyway.com at Internet  
Subject: BNSF Proposed Access to South Texas Liquid Terminals  
----- Message Contents -----

Pete,

Linda Gaeta has asked that I respond to your note of April 28 concerning whether or not South Texas Liquid Terminals is open to service by BNSF. You indicated that BNSF believes it is entitled to serve this facility under the Settlement Agreement because it is a transload facility in San Antonio, a "2-to-1" point specifically listed in Exhibit A to the Agreement.

Based on my review of the facts, I have concluded that South Texas Liquid Terminals does not qualify as a transload facility located at San Antonio. Consequently, BNSF does not have access to this facility.

UP agrees that South Texas Liquid Terminals is a transload facility, but it is located at Travis, TX which is a separate rail station distinct from San Antonio. Travis is not a "2-to-1" location. It is UP's opinion that the geographical boundaries of "2-to-1" stations are defined by the switching limits for that station. This is the only consistent definition of "San Antonio" over the life of the Settlement Agreement. In fact, UP's switching limits are shown in former tariff MP 8170-C, supplement 149, page 98. M. P. 255.97 sets the outer limit of the switching district, and it is nearly 2 miles closer to San Antonio than South Texas Liquid Terminals.

Municipal boundaries/corporate limits will change over time. The switching limits previously established by MP for service by SP set the boundaries of the "2-to-1" station of San Antonio. UP does not agree with your statement that the existence of a nearby industry (Fite Distribution Services) which is accessible to BNSF automatically establishes what you define as the "San Antonio reciprocal switch district". It is my understanding that BNSF may use this methodology to establish switching limits, but UP does not. The page of the reciprocal switch tariff that you cite stated what industries were open to the SP via reciprocal switching. It did not set the switching limits of San Antonio.

I regret the confusion this may have caused, but South Texas Liquid Terminals is not on a list that UP generated. We do not have the resources to review every list that BNSF has submitted to the STB with your quarterly reports to determine whether or not BNSF has added a station/customer and whether or not UP agrees with that representation.

NOT SUBJECT TO RCCR TARIFFS, SEE ITEM 117.

IL CC A-503

**SUPPLEMENT  
TO**

ICC MP 8170-C



**MISSOURI PACIFIC RAILROAD COMPANY**

**SUPPLEMENT 149**

**TO**

**TARIFF MP 8170-C**

(Cancels Supplements 78, 89, 127, 134, 135, 136, 137, 138, 146 and 148)

Supplement 149 and Special Supplements shown on page 2 herein contain all changes.

**LOCATION OF NEW OR CHANGED ITEMS**

The latest complete list of all new or changed items in effective Supplements is published in this Supplement.

**ABSORPTIONS OF SWITCHING AND OTHER TERMINAL CHARGES**

**AND**

**ALLOWANCES**

**AT STATIONS**

**ON**

**MISSOURI PACIFIC RAILROAD  
DONIPHAN, KENSSETT & SEARCY RAILWAY**

(Except as Noted in Item 325)

THIS TARIFF APPLIES ON INTRASTATE TRAFFIC IN THE STATES OF ARKANSAS, COLORADO, ILLINOIS, KANSAS, LOUISIANA, MISSOURI, NEBRASKA, OKLAHOMA, TENNESSEE (MEMPHIS) AND TEXAS.

**SWITCHING TARIFF**

**ISSUED OCTOBER 17, 1994**

**EFFECTIVE DECEMBER 2, 1994**

**K. H. SCHROEDER**  
Manager-Pricing Services  
Omaha, Nebraska

Issued by  
**G. OSLER**  
Publishing Officer  
1416 Dodge St.  
Omaha, Nebraska 68179

(D.W.C.)



**LIST OF CORPORATIONS, FIRMS, INDIVIDUALS AND TEAM TRACK LOCATIONS  
FROM AND TO WHICH RECIPROCAL RATES APPLY**

**STATION**

Pine Bluff ..... AR

**CORPORATION, FIRM, INDIVIDUAL OR TEAM TRACK LOCATION**

Arkansas Oak Flooring Co .....  
 Arkansas Power & Light Co (Woodward Station) .....  
 Arkhola Sand & Gravel Co .....  
 Fox Bros Hardware Co .....  
 Hoover Oil Co .....  
 Hutt Building Material Co .....  
 [114] Johnson Metal Recyclers .....  
 Pearson, Ben, Inc. ....  
 [69] Pine Bluff Warehouse #4 .....  
 [13] Planters Cotton Oil Mill, Inc. ....  
 Ritchie Grocer Co .....  
 Riverside Chemical Co. ....  
 Sears, Roebuck & Co .....  
 Soltz Machinery & Supply Co .....  
 Standard Brake Shoe & Foundry Co .....  
 Stock Yard Feed Co .....  
 [67] Viking Bag (Shurfine Central) .....  
 (DQ-3177)

**STATION**

Robstown ..... TX

**CORPORATION, FIRM, INDIVIDUAL OR TEAM TRACK LOCATION**

[128] Petronia Grain .....  
 Weskem, Inc. ....  
 (DQ-3242)

**STATION**

Salem ..... IL

**CORPORATION, FIRM, INDIVIDUAL OR TEAM TRACK LOCATION**

Ed Walker, Inc. ....  
 [112] Effingham Clay Service .....  
 Egyptian Concrete .....  
 Illinois Power .....  
 [28] Jiffy Packaging .....  
 Witco Chemical at C and M Team Track .....

**STATION**

San Antonio ..... TX

**CORPORATION, FIRM, INDIVIDUAL OR TEAM TRACK LOCATION****GROUP A**

[30] Allen & Allen Lumber .....  
 [30] Celotex .....  
 [30] City Public Service, Leon Creek .....  
 [30] GLI Distributing .....  
 [30] Halo Distributing .....  
 [30] M. G. Building Materials (Hemler, TX) .....  
 [30] Pressel Lumber .....  
 [30] Rainbo Baking .....  
 [30] V. R. Hood Company .....

**GROUP B**

[224] Acme Sawdust Co .....  
 ALCO Packaging .....  
 Big Tex Grain Co .....  
 [148] [224] Clappitt Paper Co .....  
 Dittmar Lumber Company .....  
 Fite Distribution Services Co., The .....  
 Magnolia Seed, Hardware & Implement Co .....  
 Merchants Transfer & Storage Co .....  
 Owens-Corning Fiberglass Corp .....  
 S. Riekes Company, Inc .....  
 Star Seed and Grain .....  
 (DQ-3271)

2A

BNSF 8005

Original Title Page

THE BURLINGTON NORTHERN AND SANTA FE RAILWAY COMPANY

BNSF SWITCHING BOOK 8005

(Cancels Freight Tariffs BN 8005-D, ATSF 8000-H, ATSF 8001-E, ATSF 8002-E, ATSF 8003-C and ATSF 8005-E)

PROVIDING

SWITCHING AND OTHER TERMINAL CHARGES

ALSO

RULES GOVERNING ABSORPTION SWITCHING

AT

STATIONS ON THE BURLINGTON NORTHERN AND SANTA FE RAILWAY COMPANY

BETWEEN STATIONS IN THE CONTINENTAL UNITED STATES

ALSO

BETWEEN STATIONS IN THE CONTINENTAL UNITED STATES  
AND STATIONS IN CANADA

For Intrastate Application, see Item 110.

SWITCHING BOOK

For explanation of abbreviations and reference marks, see last page of book.

ISSUED June 11, 1997

EFFECTIVE July 4, 1997

Issued by M. F. Schneider, PO Box 961069, Ft. Worth, TX 76161-0069



## RULES AND OTHER GOVERNING PROVISIONS

SPECIAL RULES AND REGULATIONS  
UNLIMITED

APPLICATION	SUBJECT	ITEM
<p>The provisions of this item apply on unit train shipments of Potash, STCC No. 22-125-34; 28-125-52 and 28-125-67. A unit train shall consist of forty (40) or more cars billed to one destination moving as a unit on the same train.</p> <p>Potash unit trains held short of destination for any reason not attributable to BNSF are subject to a hold charge of \$25.00 per car per day for each day or fraction thereof that a train is held beginning with the first 12:01 a.m. after hold time begins. Upon arrival at the hold point, BNSF shall notify the shipper, in writing, of the date and time that hold time begins. Upon departure of the train from the hold point, BNSF shall notify the shipper, in writing, of the date and time that hold time ends.</p> <p>In addition, BNSF may release locomotives from the potash unit train. In the event locomotives are released, the shipper shall pay BNSF a release charge of \$1,000 per occurrence per train.</p> <p>The above charges are in lieu of any demurrage charges that may accrue at the hold point.</p>	HOLD CHARGES FOR POTASH UNIT TRAINS HELD SHORT OF DESTINATION	(A) 147 (Addition)
Unless otherwise specifically provided, BNSF will not permit delivery of cars on its public team tracks or sidings, except when BNSF performs a road-haul service on such cars into the station at which delivery is made, nor will it permit loading of cars on its public team tracks or sidings, except when BN performs a road-haul service on such cars from the originating station.	USE OF BNSF PUBLIC TEAM TRACKS OR SIDINGS	150
Cars will not be received from connecting lines when consigned "Shipper's Order" or when billed in care of private sidings when consignee is not located on tracks of BNSF.	HANDLING OF "SHIPPER'S ORDER" FREIGHT	155
Order bills of lading will not be issued to cover intra-terminal or inter-terminal movements. (See Item 130)		
Unless otherwise provided, the private tracks used by industries as named in this tariff are to be used exclusively for the handling of traffic to or from such industries.	PRIVATE OR INDUSTRY TRACKS	160
The weight and charges on commodities when transported in tank cars will be based on the full gallonage capacity of the tank subject to Rule 35 of Tariff UFC 6000-Series, except when charges in dollars and cents per car are named charges in dollars and cents per car will apply.	COMMODITIES IN TANK CARS	165
When an empty car is received from a connecting carrier for loading by an industry located on the BNSF, and is refused by the industry because the car is not in proper condition to load and must be returned to the connecting carrier, a charge of \$225.00 per car will be assessed against the connecting carrier. The charge will be made for one direction only.	EMPTY CARS RETURNED UNFIT FOR LOADING	175
Except as otherwise provided herein, the switching limits of the BNSF will be confined to the most distant industry listed from the point of interchange with connections shown within the station.	DEFINITIONS OF SWITCHING LIMITS	180
Switching charges within the station will not apply on traffic originating or destined beyond the industries listed. The yard limit board does not have any meaning whatever with respect to defining the switching limits.		
Charges for intra-terminal and inter-terminal switching named in this tariff apply only when shipments are packed in accordance with the requirements published in Tariff UFC 6000-Series. Shipments not packed in accordance with the requirements published in Uniform Freight Classification will not be accepted.	PACKAGE REQUIREMENTS	185

For explanation of abbreviations and reference marks, see last page of book.

ISSUED May 7, 1998

EFFECTIVE May 28, 1998

Issued by M. F. Schneider, PO Box 961069, Ft. Worth, TX 76161-0069



STB

FD

32760

8-4-98

D

190366

1/2

## UNION PACIFIC RAILROAD COMPANY

1416 DODGE STREET  
ROOM 830  
OMAHA, NEBRASKA 68179-0001  
FAX (402) 271-5610

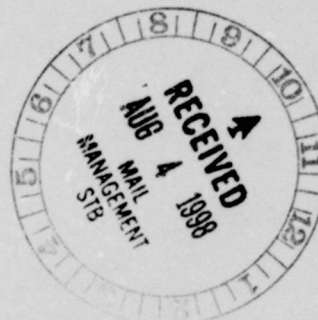
ENTERED  
Office of the Secretary

AUG - 4 1998

Part of  
Public Record



August 3, 1998

**VIA UPS NEXT DAY AIR**

Mr. Vernon A. Williams, Secretary  
Surface Transportation Board  
1925 K Street NW, Suite 700  
Washington, DC 20423

Re: Finance Docket 32760. UP - Control and Merger - SP

Dear Mr. Williams:

Pursuant to Decision No. 44, UP/SP submits station passing reports for the month of July, 1998 for the cities of Reno, Nevada and Wichita, Kansas. The reports indicate that UP/SP is in compliance with Condition 22.a and Condition 23.a of Exhibit G to Decision No. 44.

	<u>Reno</u>	<u>Wichita</u>
Cap	14.7	6.4
Average Through Freight Trains	10.7	4.29

The attached original and 20 copies of the verified reports include the details for both included and excluded trains for each day during July.

Very truly yours,

Louise A. Rinn  
General Commerce Counsel  
(402) 271-4227

LAR:mag  
Attachments

C: (With attachments)

PERSONAL (2 copies)  
Elaine Kaiser  
Section of Environmental Analysis  
Surface Transportation Board  
1925 K Street, NW  
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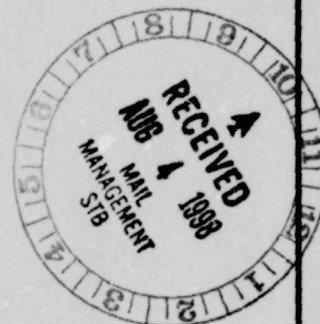
(With Wichita Report)  
Bill Stockwell  
Metropolitan Planning Department  
City Hall  
455 North Main Street  
Wichita, KS 67202



190366

**RECAP OF PASSING REPORTS FOR MONTH OF JULY 1998**  
**RENO, NEVADA**

DATE	FREIGHT
1-Jul	8
2-Jul	9
3-Jul	15
4-Jul	11
5-Jul	10
6-Jul	10
7-Jul	11
8-Jul	10
9-Jul	9
10-Jul	12
11-Jul	15
12-Jul	8
13-Jul	11
14-Jul	14
15-Jul	9
16-Jul	10
17-Jul	12
18-Jul	10
19-Jul	10
20-Jul	9
21-Jul	12
22-Jul	11
23-Jul	11
24-Jul	
25-Jul	
26-Jul	
27-Jul	
28-Jul	
29-Jul	
30-Jul	
31-Jul	



**ENTERED**  
**Office of the Secretary**

**AUG - 4 1998**

**Part of**  
**Public Record**

*Original*

**FREIGHT TRAIN MONTH TO DATE AVERAGE**

10.7

**AUTHENTICATION:**

I certify under penalty of perjury that the foregoing record is true and correct and compiled from records maintained by SPT Company in the usual and ordinary course of business.

Don K. Shuck 8-3-98  
General Superintendent Date  
Western region - Harriman Dispatch Center

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Wednesday July 1, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSTNPB-27	12:00 AM	1MROSTB-28	1:05 AM
1ZOAG1-01	2:05 PM	1ZG1OA-28	4:20 AM
1FSGDVJ-01	11:35 AM	1MNPSTB-23	9:05 AM
		1MSPRVX-01	4:30 PM
		1MSPOPX-01	6:15 PM

<b>EAST TRAINS:</b>	<b>3</b>	<b>WEST TRAINS:</b>	<b>5</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>8</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0511 PM)	1
PSGR TRAINS: (#5 RENO 0608 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WGOVR-28	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Thursday July 2, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVROX-01	1:25 AM	1ZG1OA-29	1:35 AM
1MSTNPB-30	8:25 AM	1MNPSTB-27	5:50 AM
1AOAKS-01	9:35 AM	1MROSTB-30	2:55 PM
1ZOAG1-02	1:55 PM		
1MRVRO-01	5:40 PM		
1GEFSSD-01	7:10 PM		

**EAST TRAINS:** 6  
**TOTAL FREIGHT TRAINS:** 9

**WEST TRAINS:** 3

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0712 PM)	1
PSGR TRAINS: (#5 RENO 0510 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WBKOGT-30	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Friday July 3, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1GETKPB-02	2:20 AM	1AKSBE-26	1:05 PM
1MSGDVJ-28	6:05 PM	1ZG10A-30	3:55 AM
1MRVRO-02	9:50 AM	1MNPSTB-28	6:55 AM
1MOAROX-01	1:30 PM	1MSDST-24	7:55 AM
1ZOAG1-03	12:35 PM	1GDBRFR-28	2:55 PM
1AOAKS-02	4:40 PM	1MNPSTX-02	6:15 PM
1AOAKS-01	8:25 PM	1ZG10A-01	11:05 PM
		1AKSBRE-29	11:20 PM

**EAST TRAINS:** 7  
**TOTAL FREIGHT TRAINS:** 15

**WEST TRAINS:** 8

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0505 PM)	1
PSGR TRAINS: (#5 RENO 0150 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	2
<b>TOTAL:</b>	<b>4</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Saturday July 4, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSTNPB-02	5:00 AM	1GOMITR-28	3:10 AM
3ARIKCJ-02	5:15 AM	1GDSJTL-28	8:35 AM
1AOAKSB-03	1:05 PM	1MNPSTB-30	7:30 PM
1ZOAG1-04	1:25 PM	1ZG1OA-02	4:05 PM
1GSTUNY-03	7:50 PM	1MNPSTB-01	8:35 PM
1MRVRO-03	7:20 PM		

**EAST TRAINS: 6**  
**TOTAL FREIGHT TRAINS: 11**

**WEST TRAINS: 5**

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0439 PM)	1
PSGR TRAINS: (#5 RENO 0408 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Sunday July 5, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1CRIGV-01	12:10 AM	1AKSBE-30	12:20 AM
1MOAROX-03	7:55 AM	1GSNCTR-01	6:00 AM
1AOAKS-04	11:55 AM	1GANYFS-28	2:45 PM
1MRVRO-05	11:20 PM	1GDFRPX-28	6:10 PM
		1AKSBE-02	8:10 PM
		1ZG1OA-03	10:40 PM

**EAST TRAINS:** 4  
**TOTAL FREIGHT TRAINS:** 10

**WEST TRAINS:** 6

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0558 PM)	1
PSGR TRAINS: (#5 RENO 1153 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Monday July 6, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>			<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>		<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-04	5:20 AM		1CCOPNI-01	4:05 AM
1AOAKS-05	10:55 AM		1MROSTB-02	10:05 AM
1MSTNPB-04	4:15 PM		1MROSTB-03	11:30 AM
1CLXUP-01	2:25 PM		1MNPSTB-02	3:30 PM
1MSTNPB-05	10:50 PM		1ZG1OA-05	4:15 PM

**EAST TRAINS: 5**  
**TOTAL FREIGHT TRAINS: 10**

**WEST TRAINS: 5**

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0457 FM)	1
PSGR TRAINS: (#5 RENO 1251 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WSUPR-04	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Tuesday July 7, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-06	12:05 AM	1AKSBE-01	1:40 AM
1MSGDVJ-05	2:20 AM	1AKSBE-03	4:00 AM
1GSPXKP-04	5:10 AM	1MS?STX-07	4:25 PM
1MRVRO-07	2:35 PM	1MROSTB-01	4:30 PM
1ZOAG1-07	2:55 PM	1ZG1OA-05	5:15 PM
1MOAROX-07	11:55 PM		

**EAST TRAINS:** 6  
**TOTAL FREIGHT TRAINS:** 11

**WEST TRAINS:** 5

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0531 PM)	1
PSGR TRAINS: (#5 RENO 0155 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WRVRPR-06	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Wednesday July 8, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1GSTROL-07	2:00 AM	1MNPSTB-03	7:55 AM
1AOAKS-06	1:09 AM	1ZG1OA-06	1:00 PM
1MRVRO-08	8:40 AM	1GSGOTL-02	1:55 PM
1AOAKS-07	1:00 PM	1MROSTB-03	2:31 PM
1MOAROX-08	1:55 PM		
1ZOAG1-08	2:20 PM		

**EAST TRAINS:** 6  
**TOTAL FREIGHT TRAINS:** 10

**WEST TRAINS:** 4

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0445 PM)	1
PSGR TRAINS: (#5 RENO 0743 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Thursday July 9, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSGDVJ-06	5:35 PM	1AKSBE-06	3:50 AM
1MOAROB-08	5:55 AM	1MNPSTB-06	9:40 AM
1AOAKS-08	10:00 AM	1AKSBE-05	3:00 PM
1ZOAG1-09	12:20 PM	1ZG1OA-07	3:40 PM
1GETLCT-07	3:35 PM		

<b>EAST TRAINS:</b>	<b>5</b>	<b>WEST TRAINS:</b>	<b>4</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>9</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0511 PM)	1
PSGR TRAINS: (#5 RENO 0411 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	2
<b>TOTAL:</b>	<b>4</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Friday July 10, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
11OAGSX-06	4:00 PM	1GDHLTL-03	6:30 PM
1MRVRO-09	2:40 PM	1GDASKE-02	12:15 AM
1AOAKS-09	1:00 PM	1MROSTB-06	3:50 AM
1ZOAG1-10	12:00 PM	1MNPSTB-05	11:20 AM
1MRVRO-10	10:15 PM	1MNPSTB-04	8:45 AM
		12G1OA-08	4:50 PM
		1MNPSTB-07	6:55 PM

**EAST TRAINS: 5**  
**TOTAL FREIGHT TRAINS: 12**

**WEST TRAINS: 7**

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0520 PM)	1
PSGR TRAINS: (#5 RENO 0250 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Saturday July 11, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1CRIGV-10	7:50 AM	1MNPSTB-05	11:30 AM
1MSGDVJ-08	10:08 AM	1MNPSTB-07	6:55 PM
1MWBSX-09	10:35 AM	1MNPSTB-08	10:40 PM
1MSTNPB-07	11:40 AM	1MROSTB-07	8:40 AM
1AQAKSB-10	1:25 PM	1AKSBE-08	10:50 AM
1ZOAG1-11	1:10 PM	1MNPSTB-09	12:50 PM
2MWCSX-09	5:30 PM	1ZG1OA-09	4:15 PM
1MRVROX-09	10:00 PM		

**EAST TRAINS:** 8  
**TOTAL FREIGHT TRAINS:** 15

**WEST TRAINS:** 7

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0453 PM)	1
PSGR TRAINS: (#5 RENO 0513 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOLIR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Sunday July 12, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSGDVJ-10	11:35 AM	1MROSTB-08	5:10 AM
1GEPXFR-09	3:30 AM	1MOGST-05	9:10 AM
1AOAKS-11	12:05 PM	1ZG10A-10	7:55 PM
1ZOAG1-12	2:35 PM		
1MRVRO-11	9:50 PM		

<b>EAST TRAINS:</b>	<b>5</b>	<b>WEST TRAINS:</b>	<b>3</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>8</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0457 PM)	1
PSGR TRAINS: (#5 RENO 1227 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Monday July 13, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1UPIQJ-10	7:20 AM	1MNPOSB-11	1:20 AM
1MOAROB-10	11:05 AM	1MNPSOS-09	6:50 AM
1MSTNPB-11	10:40 AM	1MNPSTB-11	11:50 AM
1GSTLSO-11	1:15 PM	1ZG1QA-11	4:10 PM
1AOAKS-12	11:50 AM		
2MSTNPB-12	3:20 PM		
1MSTNPB-12	8:35 PM		

**EAST TRAINS:** 7  
**TOTAL FREIGHT TRAINS:** 11

**WEST TRAINS:** 4

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0509 PM)	1
PSGR TRAINS: (#5 RENO 1124 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Tuesday July 14, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1GECASP-12	3:50 AM	1MSPOAX-14	2:25 AM
1MRVRO-12	6:20 AM	1MNPSTB-10	4:35 AM
1CRIGV-13	4:35 AM	1MROSTB-12	6:30 AM
1AOAKS-13	1:00 AM	1MNPOSB-12	7:10 AM
1GEFSCB-12	9:20 AM	1ZG10A-12	3:40 PM
1MRVROB-11	2:50 PM	1MNPOSB-13	8:15 PM
1ZOAG1-14	1:35 PM		
1MSGDVJ-13	6:15 PM		

**EAST TRAINS:** 8  
**TOTAL FREIGHT TRAINS:** 14

**WEST TRAINS:** 6

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0541 PM)	1
PSGR TRAINS: (#5 RENO 0147 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Wednesday July 15, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>			<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>		<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MOAROB-12	9:50 AM		1MNPOSB-13	8:15 PM
1GRSTSY-14	8:00 AM		1MNPSTB-12	10:50 PM
1AOAKS-14	8:15 AM		1MROSTB-10	10:10 AM
1ZOAG1-15	5:50 PM		1ZG1OA-13	5:00 PM
			1AKSBE-12	10:55 PM

**EAST TRAINS:** 4  
**TOTAL FREIGHT TRAINS:** 9

**WEST TRAINS:** 5

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0525 PM)	1
PSGR TRAINS: (#5 RENO 0420 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Thursday July 16, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSVPR-12	4:05 AM	1MROST-14	11:10 AM
1MRVRO-13	1:35 AM	1GSKRPX-11	7:05 AM
3MSGDVJ-13	5:50 AM	1ZG1OA-14	2:55 PM
1MRVRO-15	10:50 AM	1MROOA-14	4:10 PM
1ZOAG1-16	1:00 PM	1GSNCST-11	7:30 PM

**EAST TRAINS:** 5  
**TOTAL FREIGHT TRAINS:** 10

**WEST TRAINS:** 5

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0645 PM)	1
PSGR TRAINS: (#5 RENO 0113 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WEDOGT-15	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Friday July 17, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>			<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>		<b>TRAIN ID</b>	<b>RENO(EST)</b>
1GEKENC-14	2:55 AM		1MNPSTB-13	3:35 AM
1AOAKS-16	7:15 AM		1CCOPN-12	6:25 AM
1MSTNPB-15	10:50 AM		1CSRST-13	8:05 AM
1MRVRO-14	5:45 PM		1MSPOAX-16	4:35 PM
1ZOAG1-17	11:25 AM		1ZG1OA-15	3:50 PM
1MOAROB-14	7:40 PM		1MNPSB-14	8:25 PM

**EAST TRAINS: 6**  
**TOTAL FREIGHT TRAINS: 12**

**WEST TRAINS: 6**

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0555 PM)	1
PSGR TRAINS: (#5 RENO 0101 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WEGRVR-14	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Saturday July 18, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO (EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO (EST)</b>
1MRVROX-17	2:30 AM	1MROOA-15	6:15 AM
1MSGDVJ-15	10:00 AM	1MNPSTB-15	5:20 AM
1AOAKSB-17	11:35 AM	1MSPSTX-18	5:10 PM
1ZOAG1-18	2:25 PM	1ZG1OA-16	6:20 PM
1CRVRV-17	7:05 PM		
1GETLSY-15	11:10 PM		

**EAST TRAINS: 6**  
**TOTAL FREIGHT TRAINS: 10**

**WEST TRAINS: 4**

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0607 PM)	1
PSGR TRAINS: (#5 RENO 0641 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Sunday July 19, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
MOARO-16	7:20 AM	1CRVRV-17	3:55 AM
1MSUKCX-15	6:25 AM	1GDSJTL-06	1:25 AM
1MSGPVJ-18	8:30 AM	1AKSBE-15	5:10 PM
1MRVNPX-18	3:30 PM	1ZG1OA-17	8:30 PM
1AMINP-18	2:25 PM		
1CRIGV-16	7:45 PM		

**EAST TRAINS:** 6  
**TOTAL FREIGHT TRAINS:** 10

**WEST TRAINS:** 4

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0548 PM)	1
PSGR TRAINS: (#5 RENO 0317 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WRVLRR-18	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Monday July 20, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-18	12:30 AM	2MNPSTB-13	2:20 AM
1MOARO-17	4:35 AM	1MNPOSB-15	9:55 AM
1MSTNPB-18	12:10 PM	1GDOGFS-18	2:25 PM
1MSTNPB-17	9:35 AM		
1MSGDVJ-15	6:55 PM		
1GEDTER-15	7:25 PM		

**EAST TRAINS:** 6  
**TOTAL FREIGHT TRAINS:** 9

**WEST TRAINS:** 3

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0511 PM)	1
PSGR TRAINS: (#5 RENO 0107 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WOGMST-19	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Tuesday July 21, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSGDVJ-17	6:55 AM	1AKSBE-17	3:00 AM
1GSPXTH-19	1:20 AM	1ZG1OA-18	1:50 AM
1MSUKCX-18	7:05 AM	1ENGSA-21	3:35 AM
1ZOAG1-21	3:20 PM	1MNPSTB-16	11:30 AM
1MOARO-20	6:10 PM	1MNPSTB-17	4:30 PM
1MSGDVJ-19	11:55 PM	1ZG1OA-19	10:15 PM

**EAST TRAINS: 6**  
**TOTAL FREIGHT TRAINS: 12**

**WEST TRAINS: 6**

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0603 PM)	1
PSGR TRAINS: (#5 RENO 0101 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Wednesday July 22, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRB-19	12:45 AM	1MROOA-19	8:10 AM
1MRVNPX-21	3:25 AM	1GDWRLV-19	6:20 AM
1LRVRV-20	6:40 AM	1MROOA-16	2:55 AM
1AOAKS-21	8:10 AM	1MNPSTB-19	7:55 PM
1MSTNPB-20	2:10 PM		
1MSTNPB-19	8:45 PM		
1MRVNP-22	9:55 PM		

**EAST TRAINS:** 7  
**TOTAL FREIGHT TRAINS:** 11

**WEST TRAINS:** 4

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0537 PM)	1
PSGR TRAINS: (#5 RENO 0732 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Thursday July 23, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSGDVJ-22	3:30 AM	1LRVRV-20	5:30 AM
1MOARO-21	6:20 AM	1ZG1OA-20	11:15 AM
1AOAKS-22	8:05 AM	1MNPSTB-18	8:25 PM
1GETLTH-20	11:30 AM	1MROOR-13	7:30 PM
1ZGOA1-23	12:55 PM	1AKSBE-19	11:45 PM
1GEFSSY-18	4:55 PM		

**EAST TRAINS: 6**  
**TOTAL FREIGHT TRAINS: 11**

**WEST TRAINS: 5**

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0540 PM)	1
PSGR TRAINS: (#5 RENO 1049 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Friday July 24, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSGDVJ-23	10:00 AM	1ZG1OA-21	7:20 AM
1MRVRO-21	4:50 AM	1MROOA-22	12:40 PM
1MOARO-22	5:10 AM	1LRVRV-21	9:30 PM
1MSTNPB-22	11:40 AM		
1LBVRV-21	1:05 PM		
1ZOAG1-24	1:20 PM		
1MSTNPB-23	2:05 PM		
1MSTNPB-21	5:35 PM		

<b>EAST TRAINS:</b>	<b>8</b>	<b>WEST TRAINS:</b>	<b>3</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>11</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0742 PM)	1
PSGR TRAINS: (#5 RENO 1232 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WBKOGT-22	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Saturday July 25, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1LRVRV-24	5:20 AM	1ZG1OA-22	2:30 AM
1UPIJOJ-24	6:50 AM	1MNPSTB-22	2:50 AM
1MSUPR-23	10:55 AM	1COOPN-22	3:10 AM
1ZOAG1-25	2:00 PM	1MROCA-23	7:40 AM
1MOARO-24	1:20 PM	1MNPSTB-21	3:50 PM
1MSTNPB-24	7:35 PM	1GSOGTR-23	2:35 PM

**EAST TRAINS:** 6  
**TOTAL FREIGHT TRAINS:** 12

**WEST TRAINS:** 6

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0456 PM)	1
PSGR TRAINS: (#5 RENO 1217 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	2
<b>TOTAL:</b>	<b>4</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Sunday July 26, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MOARO-23	9:05 AM	1MNPSTB-21	3:50 PM
1MSGDVJ-24	8:10 AM	1ZG1OA-23	11:10 PM
1AOAKS-25	10:05 AM	1LRVRV-24	2:15 AM
1ZOAG1-26	12:35 PM	1GSSOTL-17	12:35 PM
		1GDHLDH-11	6:00 PM

<b>EAST TRAINS:</b>	<b>4</b>	<b>WEST TRAINS:</b>	<b>5</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>9</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0458 PM)	1
PSGR TRAINS: (#5 RENO 1210 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WELWLB-24	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Monday July 27, 1998**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1LRVRV-26	12:35 AM	1ZG1OA-24	11:55 AM
1MOARO-25	12:20 PM	1AKSBE-23	2:10 AM
1MSGDVJ-26	1:35 AM	1MROOA-24	6:10 AM
1MRVNPX-25	11:35 PM	1LRVRV-26	7:55 AM
		1MNPSTB-25	4:10 PM
		1ZG1OA-25	9:45 PM
		1AKSBE-20	9:55 PM

**EAST TRAINS:** 4  
**TOTAL FREIGHT TRAINS:** 11

**WEST TRAINS:** 7

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0452 PM)	1
PSGR TRAINS: (#5 RENO 1158 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Tuesday July 28, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSTNPB-25	2:05 PM	1MNPSTB-20	2:45 AM
1MOARO-27	10:20 AM	1AKSBE-22	6:25 PM
1AOAKS-27	10:50 AM		
1ZOAG1-28	12:35 PM		
1MSTNPB-26	3:05 PM		

<b>EAST TRAINS:</b>	<b>5</b>	<b>WEST TRAINS:</b>	<b>2</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>7</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0543 PM)	1
PSGR TRAINS: (#5 RENO 0120 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Wednesday July 29, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1SSUSP-27	3:20 AM	1ZG1OA-26	1:00 AM
1AOAKS-28	7:50 AM	1MROOA-25	4:35 AM
1ZOAG1-29	11:45 AM	1AKSBE-25	2:40 AM
1GEDHNC-25	12:55 PM	1MROOA-27	6:55 AM
3MSGDVJ-27	3:20 PM	1MNPSTB-24	12:40 PM
1MRVNPX-26	6:40 PM	1ZG1OA-27	10:15 PM
1GETUNB-21	10:40 PM	1MNPSTB-27	10:30 PM

**EAST TRAINS:** 7  
**TOTAL FREIGHT TRAINS:** 14

**WEST TRAINS:** 7

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0731 PM)	1
PSGR TRAINS: (#5 RENO 1151 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>



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**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Thursday July 30, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1UPIBJ-27	1:55 AM	1MNPSTB-23	8:30 AM
1MOARO-28	7:25 AM	1MROOPX-28	5:00 PM
1AOAKS-29	8:20 AM	1MNPSTB-28	10:15 AM
1ZOAG1-30	1:20 PM	1ZG1OA-28	10:50 AM
1MRVRO-26	2:20 AM		
1MSGDVJ-27	4:30 PM		

**EAST TRAINS:** 6  
**TOTAL FREIGHT TRAINS:** 10

**WEST TRAINS:** 4

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0619 PM)	1
PSGR TRAINS: (#5 RENO 0338 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WOGMGT-25	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Friday July 31, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSTNPB-27	12:30 AM	1AKSBE-27	3:00 AM
1MSTNPB-28	7:50 AM	1MNPSTB-26	10:10 AM
1MUARO-26	10:05 AM		
1AQAKS-30	2:20 PM		
1ZOAG1-31	2:50 PM		
1MOARO-29	8:50 PM		
1MSGDVJ-29	7:35 PM		
1GSTRWR-28	11:15 PM		

<b>EAST TRAINS:</b>	<b>8</b>	<b>WEST TRAINS:</b>	<b>2</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>10</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

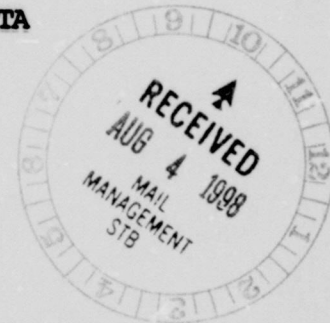
PSGR TRAINS: (#6 RENO 0530 PM)	1
PSGR TRAINS: (#5 RENO 1128 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>



PROGRAM: FPAN127.FOCUS.EXEC(AEIHIST-WHTA-3) 08/02/98 10.29.54

190366

**TRANSPORTATION RESEARCH**  
**AEI SCANNER TRAIN HISTORY SUMMARY FOR SCANNER #359-SOUTH WICHITA**  
**FOR PERIOD 07/01/98-07/31/98**



DATE	THRU TRAINS
07/01/98	4
07/02/98	3
07/03/98	2
07/04/98	2
07/05/98	2
07/06/98	6
07/07/98	7
07/08/98	1
07/09/98	9
07/10/98	3
07/11/98	8
07/12/98	3
07/13/98	4
07/14/98	5
07/15/98	2
07/16/98	5
07/17/98	4
07/18/98	8
07/19/98	4
07/20/98	4
07/21/98	3
07/22/98	3
07/23/98	6
07/24/98	6
07/25/98	4
07/26/98	4
07/27/98	4
07/28/98	4
07/29/98	3
07/30/98	7
07/31/98	3

**ENTERED**  
**Office of the Secretary**

AUG - 4 1998

**Part of**  
**Public Record**

\*TOTAL 98

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\*\* AVG\_THRU\_TRN 4.29

TOTAL

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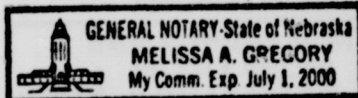
STATE OF NEBRASKA )

) ss.

COUNTY OF DOUGLAS )

VERIFICATION

Clyde Anderson, being first duly sworn, deposes and says that he has read the foregoing document, knows the facts asserted therein, and that the same are true as stated.



*Clyde Anderson*  
 Clyde Anderson

SUBSCRIBED AND SWORN to before me this 3<sup>rd</sup> day of August, 1998.

*Melissa A. Gregory*  
 Notary Public

PROGRAM: FPAN127.FOCUS.EXEC(AETHIST-WHTA-4) 08/02/98 10.29.54

TRANSPORTATION RESEARCH  
 AEI SCANNER TRAIN HISTORY DETAIL REPORT FOR SCANNER #359-SOUTH WICHITA  
 FOR PERIOD 07/01/98-07/31/98

DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
07/01/98	0014	8370	YWH62 30	Y	YARD/WORK	N
07/01/98	0642	8371	LVB55 01	L	ARK CTY LOC	S
07/01/98	0709	8372	MFWWT 30	T	THROUGH	N
07/01/98	0818	8373	GECCSI 25	G	THROUGH	N
07/01/98	0947	8374	YWH55 01	Y	YARD/WORK	S
07/01/98	1053	8375	YWH55 01	Y	YARD/WORK	N
07/01/98	1156	8376	LVB55 01	L	ARK CTY LOC	N
07/01/98	1408	8377	YWH55 01	Y	YARD/WORK	S
07/01/98	1601	8378	YWH55 01	Y	YARD/WORK	N
07/01/98	1731	8379	MTWTFW 01	T	THROUGH	S
07/01/98	2240	8380	LVO54 01	L	THROUGH	N
07/01/98	2249	8381	YWH62 01	Y	YARD/WORK	S
07/01/98	2332	8382	YWH62 01	Y	YARD/WORK	N
07/02/98	0631	8383	LVB55 02	L	ARK CTY LOC	S
07/02/98	1049	8384	YWH55 02	Y	YARD/WORK	S
07/02/98	1113	8385	LVO55 02	L	THROUGH	S
07/02/98	1147	8386	LVB55 02	L	ARK CTY LOC	N
07/02/98	1213	8387	YWH55 02	Y	YARD/WORK	N
07/02/98	1435	8388	YWH55 02	Y	YARD/WORK	S
07/02/98	1620	8389	YWH55 02	Y	YARD/WORK	N
07/02/98	1637	8390	GSHOCW 28	G	THROUGH	N
07/02/98	2003	8391	MTWTFW 02	T	THROUGH	S
07/02/98	2226	8392	YWH62 02	Y	YARD/WORK	S
07/02/98	2234	8393	YWH62 02	Y	YARD/WORK	N
07/03/98	0535	8394	ORIWIM 01	O	THROUGH	N
07/03/98	0635	8395	LVB55 03	L	ARK CTY LOC	S
07/03/98	1041	8396	YWH55 03	Y	YARD/WORK	S
07/03/98	1132	8397	YWH55 03	Y	YARD/WORK	N
07/03/98	1207	8398	LVB55 03	L	ARK CTY LOC	N
07/03/98	2133	8399	MFWWT 02	T	THROUGH	N
07/03/98	2348	8400	YWH62 03	Y	YARD/WORK	S
07/04/98	0123	8401	YWH62 03	Y	YARD/WORK	N
07/04/98	0655	8402	GSHOHU 01	G	THROUGH	N
07/04/98	0908	8403	GEFWSR 02	G	THROUGH	N
07/05/98	1038	8404	YWH55 05	Y	YARD/WORK	S
07/05/98	1130	8405	YWH55 05	Y	YARD/WORK	N
07/05/98	1248	8406	YWH55 05	Y	YARD/WORK	S
07/05/98	1320	8407	YWH55 05	Y	YARD/WORK	N
07/05/98	1618	8408	GSGVOL 02	G	THROUGH	N
07/05/98	1654	8409	YWH55 05	Y	YARD/WORK	S
07/05/98	1811	8410	MFWWT 03	T	THROUGH	N
07/05/98	1828	8411	YWH55 05	Y	YARD/WORK	N
07/05/98	2213	8412	YWH62 05	Y	YARD/WORK	S
07/05/98	2315	8413	YWH62 05	Y	YARD/WORK	N
07/06/98	0358	8414	MFWWT 05	T	THROUGH	N



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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
07/06/98	0419	8415	MWTFW	05 T	THROUGH	S
07/06/98	0641	8416	LVB55	06 L	ARK CTY LOC	S
07/06/98	1045	8417	YWH55	06 Y	YARD/WORK	S
07/06/98	1149	8418	YWH55	06 Y	YARD/WORK	N
07/06/98	1248	8419	LVB55	06 L	ARK CTY LOC	N
07/06/98	1803	8420	MFWWT	06 T	THROUGH	N
07/06/98	1841	8421	MFWSIX	05 T	THROUGH	N
07/06/98	2201	8422	MWTFW	06 T	THROUGH	S
07/06/98	2353	8423	GSHOAB	03 G	THROUGH	N
07/07/98	0032	8424	LVO54	06 L	THROUGH	N
07/07/98	0643	8425	LVB55	07 L	ARK CTY LOC	S
07/07/98	1054	8426	LVO55	07 L	THROUGH	S
07/07/98	1109	8427	LVB55	07 L	ARK CTY LOC	N
07/07/98	1457	8428	RCKWT	07 O	THROUGH	N
07/07/98	1646	8429	MWTFW	07 T	THROUGH	S
07/07/98	2108	8430	RWICK	07 O	THROUGH	S
07/07/98	2137	8431	GSNDCC	03 G	THROUGH	N
07/07/98	2339	8432	MFWWTX	06 T	THROUGH	N
07/08/98	0655	8433	LVB55	07 L	ARK CTY LOC	S
07/08/98	1152	8434	GSAHO	05 G	THROUGH	S
07/08/98	1307	8435	LVB55	07 L	ARK CTY LOC	N
07/09/98	0122	8436	MFWWT	07 T	THROUGH	N
07/09/98	0137	8437	LVO54	08 L	THROUGH	N
07/09/98	0149	8438	YWH62	08 Y	YARD/WORK	S
07/09/98	0233	8439	YWH62	08 Y	YARD/WORK	N
07/09/98	0526	8440	MWTFW	08 T	THROUGH	S
07/09/98	0644	8441	LVB55	09 L	ARK CTY LOC	S
07/09/98	1138	8442	LVB55	09 L	ARK CTY LOC	N
07/09/98	1314	8443	GSOLGV	06 G	THROUGH	S
07/09/98	1430	8444	LVO55	09 L	THROUGH	S
07/09/98	1648	8445	RCKWT	09 O	THROUGH	N
07/09/98	1818	8446	MWTFW	09 T	THROUGH	S
07/09/98	2045	8447	MFWWT	08 T	THROUGH	N
07/09/98	2325	8448	RWICK	09 O	THROUGH	S
07/10/98	0616	8449	MFWWT	01 T	THROUGH	N
07/10/98	0644	8450	LVB55	10 L	ARK CTY LOC	S
07/10/98	1030	8451	GSGVWA	07 G	THROUGH	N
07/10/98	1121	8452	YWH55	10 Y	YARD/WORK	S
07/10/98	1203	8453	YWH55	10 Y	YARD/WORK	N
07/10/98	1223	8454	LVB55	10 L	ARK CTY LOC	N
07/10/98	1941	8455	GEPISI	07 G	THROUGH	N
07/11/98	0104	8456	LVO54	10 L	THROUGH	N
07/11/98	0225	8457	SMHFW	09 T	THROUGH	S
07/11/98	0644	8458	LVB55	11 L	ARK CTY LOC	S
07/11/98	0716	8459	GSHUHO	06 G	THROUGH	S



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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
07/11/98	1015	8460	MFWWT	10 T	THROUGH	N
07/11/98	1056	8461	MWTFW	10 T	THROUGH	S
07/11/98	1109	8462	YWH55	11 Y	YARD/WORK	S
07/11/98	1132	8463	LVB55	11 L	ARK CTY LOC	N
07/11/98	1223	8464	YWH55	11 Y	YARD/WORK	N
07/11/98	1516	8465	YWH55	11 Y	YARD/WORK	S
07/11/98	1658	8466	YWH55	11 Y	YARD/WORK	N
07/11/98	1743	8467	GSHOWA	07 G	THROUGH	N
07/11/98	2312	8468	GSCWHO	09 G	THROUGH	S
07/11/98	2321	8469	LVO55	11 L	THROUGH	S
07/11/98	2326	8470	YWH62	11 Y	YARD/WORK	S
07/12/98	0005	8471	YWH62	11 Y	YARD/WORK	N
07/12/98	1125	8472	YWH55	12 Y	YARD/WORK	S
07/12/98	1248	8473	YWH55	12 Y	YARD/WORK	N
07/12/98	1425	8474	GLSRCC	04 G	THROUGH	S
07/12/98	1702	8475	MFWWT	11 T	THROUGH	N
07/12/98	1938	8476	GSSIGV	11 G	THROUGH	S
07/13/98	0638	8477	LVB55	13 L	ARK CTY LOC	S
07/13/98	0704	8478	MWTFW	12 T	THROUGH	S
07/13/98	0948	8479	LVB55	13 L	ARK CTY LOC	N
07/13/98	1046	8480	YWH55	13 Y	YARD/WORK	S
07/13/98	1209	8481	YWH55	13 Y	YARD/WORK	N
07/13/98	1538	8482	MFWWT	12 T	THROUGH	N
07/13/98	1915	8483	MFWWTX	11 T	THROUGH	N
07/13/98	2147	8484	YWH62	13 Y	YARD/WORK	S
07/13/98	2201	8485	YWH62	13 Y	YARD/WORK	N
07/13/98	2319	8486	LVO54	13 L	THROUGH	N
07/14/98	0204	8487	GSBECO	07 G	THROUGH	N
07/14/98	0636	8488	LVB55	14 L	ARK CTY LOC	S
07/14/98	1053	8489	YWH55	14 Y	YARD/WORK	S
07/14/98	1123	8490	LVB55	14 L	ARK CTY LOC	N
07/14/98	1140	8491	LVO55	14 L	THROUGH	S
07/14/98	1236	8492	YWH55	14 Y	YARD/WORK	N
07/14/98	1522	8493	MWTFW	13 T	THROUGH	S
07/14/98	1651	8494	RCKWT	14 O	THROUGH	N
07/14/98	1810	8495	MWTFW	14 T	THROUGH	S
07/15/98	0002	8496	YWH62	14 Y	YARD/WORK	S
07/15/98	0046	8497	YWH62	14 Y	YARD/WORK	N
07/15/98	0641	8498	LVB55	15 L	ARK CTY LOC	S
07/15/98	1021	8499	YWH55	15 Y	YARD/WORK	S
07/15/98	1109	8500	RWTCK	15 O	THROUGH	S
07/15/98	1153	8501	YWH55	15 Y	YARD/WORK	N
07/15/98	1201	8502	LVB55	15 L	ARK CTY LOC	N
07/15/98	1938	8503	MFWWT	14 T	THROUGH	N
07/16/98	0323	8504	AHNLDX	15 H	THROUGH	S

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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
07/16/98	0638	8505	LVB55	16 L	ARK CTY LOC	S
07/16/98	1014	8506	MWTFW	15 T	THROUGH	S
07/16/98	1023	8507	YWH55	16 Y	YARD/WORK	S
07/16/98	1244	8508	LVB55	16 L	ARK CTY LOC	N
07/16/98	1550	8509	RCKWT	16 O	THROUGH	N
07/16/98	1828	8510	MFWWT	15 T	THROUGH	N
07/16/98	1933	8511	GSCOB	13 G	THROUGH	S
07/17/98	0129	8512	MWTFW	16 T	THROUGH	S
07/17/98	0641	8513	LVB55	17 L	ARK CTY LOC	S
07/17/98	0948	8514	RWICK	16 O	THROUGH	S
07/17/98	1040	8515	LVB55	17 L	ARK CTY LOC	N
07/17/98	1058	8516	YWH55	17 Y	YARD/WORK	S
07/17/98	1220	8517	YWH55	17 Y	YARD/WORK	N
07/17/98	1239	8518	GSWAHO	14 G	THROUGH	S
07/17/98	2045	8519	MFWWT	16 T	THROUGH	N
07/17/98	2249	8520	YWH62	17 Y	YARD/WORK	S
07/18/98	0022	8521	YWH62	17 Y	YARD/WORK	N
07/18/98	0133	8522	LVO54	17 L	THROUGH	N
07/18/98	0151	8523	MWTFW	17 T	THROUGH	S
07/18/98	0643	8524	LVB55	18 L	ARK CTY LOC	S
07/18/98	1049	8525	MFWWT	17 T	THROUGH	N
07/18/98	1146	8526	LVB55	18 L	ARK CTY LOC	N
07/18/98	1216	8527	YWH55	18 Y	YARD/WORK	S
07/18/98	1247	8528	YWH55	18 Y	YARD/WORK	N
07/18/98	1349	8529	GSCWHO	11 G	THROUGH	S
07/18/98	1502	8530	LVO55	18 L	THROUGH	S
07/18/98	1610	8531	YWH55	18 Y	YARD/WORK	S
07/18/98	1733	8532	YWH55	18 Y	YARD/WORK	N
07/18/98	2305	8533	MFWWTX	16 T	THROUGH	N
07/18/98	2319	8534	GSCOGP	14 G	THROUGH	S
07/18/98	2335	8535	MWTFW	18 T	THROUGH	S
07/18/98	2352	8536	YWH62	18 Y	YARD/WORK	S
07/19/98	0100	8537	YWH62	18 Y	YARD/WORK	N
07/19/98	1355	8538	GSWAHO	16 G	THROUGH	S
07/19/98	1408	8539	YWH55	19 Y	YARD/WORK	S
07/19/98	1452	8540	YWH55	19 Y	YARD/WORK	N
07/19/98	1636	8541	MFWWT	18 T	THROUGH	N
07/19/98	1913	8542	MWTFW	19 T	THROUGH	S
07/19/98	2237	8543	YWH62	19 Y	YARD/WORK	S
07/19/98	2318	8544	YWH62	19 Y	YARD/WORK	N
07/19/98	2341	8545	MFWWT	13 T	THROUGH	N
07/20/98	0309	8546	GLCOCC	16 G	THROUGH	S
07/20/98	0717	8547	LVB55	20 L	ARK CTY LOC	S
07/20/98	1108	8548	YWH55	20 Y	YARD/WORK	S
07/20/98	1153	8549	LVB55	20 L	ARK CTY LOC	N



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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
07/20/98	1218	8550	YWH55	20 Y	YARD/WORK	N
07/20/98	1401	8551	GSOLFW	17 G	THROUGH	S
07/20/98	1927	8552	MFWWT	19 T	THROUGH	N
07/20/98	1958	8553	MWTFW	20 T	THROUGH	S
07/21/98	0120	8554	LVO54	20 L	THROUGH	N
07/21/98	0633	8555	LVB55	21 L	ARK CTY LOC	S
07/21/98	0951	8556	YWH55	21 Y	YARD/WORK	S
07/21/98	1110	8557	YWH55	21 Y	YARD/WORK	N
07/21/98	1208	8558	LVB55	21 L	ARK CTY LOC	N
07/21/98	1412	8559	LVO55	21 L	THROUGH	S
07/21/98	1548	8560	YWH55	21 Y	YARD/WORK	S
07/21/98	1758	8561	YWH55	21 Y	YARD/WORK	N
07/21/98	2104	8562	MWTFW	21 T	THROUGH	S
07/22/98	0044	8563	YWH62	21 Y	YARD/WORK	S
07/22/98	0129	8564	GLCOCC	21 G	THROUGH	S
07/22/98	0147	8565	YWH62	21 Y	YARD/WORK	N
07/22/98	0641	8566	LVB55	22 L	ARK CTY LOC	S
07/22/98	1006	8567	YWH55	22 Y	YARD/WORK	S
07/22/98	1106	8568	YWH55	22 Y	YARD/WORK	N
07/22/98	1215	8569	LVB55	22 L	ARK CTY LOC	N
07/22/98	1612	8570	RCKWT	22 O	THROUGH	N
07/22/98	2039	8571	MWTFW	22 T	THROUGH	S
07/22/98	2303	8572	YWH62	22 Y	YARD/WORK	S
07/22/98	2323	8573	YWH62	22 Y	YARD/WORK	N
07/23/98	0105	8574	MFWWT	20 T	THROUGH	N
07/23/98	0118	8575	LVO54	22 L	THROUGH	N
07/23/98	0419	8576	GSOLGV	20 G	THROUGH	S
07/23/98	0631	8577	LVB55	23 L	ARK CTY LOC	S
07/23/98	0938	8578	YWH55	23 Y	YARD/WORK	S
07/23/98	0951	8579	LVB55	23 L	ARK CTY LOC	N
07/23/98	1118	8580	YWH55	23 Y	YARD/WORK	N
07/23/98	1305	8581	MWTFWX	23 T	THROUGH	S
07/23/98	1423	8582	LVO55	23 L	THROUGH	S
07/23/98	1737	8583	GSWAHO	19 G	THROUGH	S
07/24/98	0116	8584	MFWWT	22 T	THROUGH	N
07/24/98	0209	8585	GSBYHO	18 G	THROUGH	S
07/24/98	0636	8586	LVB55	24 L	ARK CTY LOC	S
07/24/98	0917	8587	MWTFW	23 T	THROUGH	S
07/24/98	1051	8588	YWH55	24 Y	YARD/WORK	S
07/24/98	1154	8589	YWH55	24 Y	YARD/WORK	N
07/24/98	1218	8590	LVB55	24 L	ARK CTY LOC	N
07/24/98	1226	8591	MFWWTX	22 T	THROUGH	N
07/24/98	1507	8592	RCKWT	24 O	THROUGH	N
07/24/98	2212	8593	RWICK	24 O	THROUGH	S
07/24/98	2259	8594	YWH62	24 Y	YARD/WORK	S



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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
07/25/98	0043	8595	YWH60	24 Y	YARD/WORK	N
07/25/98	0100	8596	YWH62	24 Y	YARD/WORK	N
07/25/98	0323	8597	GEGVER	14 G	THROUGH	N
07/25/98	0635	8598	LVB55	25 L	ARK CTY LOC	S
07/25/98	1050	8599	YWH62	24 Y	YARD/WORK	S
07/25/98	1147	8600	YWH62	24 Y	YARD/WORK	N
07/25/98	1150	8601	LVB55	25 L	ARK CTY LOC	N
07/25/98	1400	8602	LVO55	25 L	THROUGH	S
07/25/98	1531	8603	MFWWT	24 T	THROUGH	N
07/25/98	1553	8604	YWH55	25 Y	YARD/WORK	S
07/25/98	1735	8605	YWH55	25 Y	YARD/WORK	N
07/25/98	2048	8606	MWTFW	25 T	THROUGH	S
07/25/98	2314	8607	YWH62	25 Y	YARD/WORK	S
07/26/98	0008	8608	YWH62	25 Y	YARD/WORK	N
07/26/98	0032	8609	MWTFWX	26 T	THROUGH	S
07/26/98	0759	8610	MFWWT	25 T	THROUGH	N
07/26/98	1204	8611	YWH55	26 Y	YARD/WORK	S
07/26/98	1303	8612	YWH55	26 Y	YARD/WORK	N
07/26/98	1532	8613	YWH55	26 Y	YARD/WORK	S
07/26/98	1719	8614	YWH55	26 Y	YARD/WORK	N
07/26/98	2008	8615	GLCOCC	18 G	THROUGH	S
07/26/98	2136	8616	MWTFW	26 T	THROUGH	S
07/26/98	2243	8617	YWH62	26 Y	YARD/WORK	S
07/26/98	2356	8618	YWH62	26 Y	YARD/WORK	N
07/27/98	0645	8619	LVB55	27 L	ARK CTY LOC	S
07/27/98	0722	8620	MFWWT	26 T	THROUGH	N
07/27/98	1000	8621	YWH55	27 Y	YARD/WORK	S
07/27/98	1053	8622	YWH55	27 Y	YARD/WORK	N
07/27/98	1121	8623	LVB55	27 L	ARK CTY LOC	N
07/27/98	1137	8624	GSCOCC	23 G	THROUGH	S
07/27/98	2257	8625	LVO54	27 L	THROUGH	N
07/27/98	2350	8626	MFWWT	27 T	THROUGH	N
07/28/98	0009	8627	YWH62	27 Y	YARD/WORK	S
07/28/98	0051	8628	YWH62	27 Y	YARD/WORK	N
07/28/98	0634	8629	LVB55	28 L	ARK CTY LOC	S
07/28/98	0959	8630	LVB55	28 L	ARK CTY LOC	N
07/28/98	1101	8631	YWH55	28 Y	YARD/WORK	S
07/28/98	1123	8632	LVO55	28 L	THROUGH	S
07/28/98	1149	8633	YWH55	28 Y	YARD/WORK	N
07/28/98	1422	8634	RCKWT	28 O	THROUGH	N
07/28/98	1727	8635	MWTFW	28 T	THROUGH	S
07/28/98	2055	8636	RWICK	28 O	THROUGH	S
07/28/98	2334	8637	YWH62	28 Y	YARD/WORK	S
07/29/98	0008	8638	YWH62	28 Y	YARD/WORK	N
07/29/98	0654	8639	LVB55	29 L	ARK CTY LOC	S

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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
07/29/98	0925	8640	YWH55	29 Y	YARD/WORK	S
07/29/98	1032	8641	YWH55	29 Y	YARD/WORK	N
07/29/98	1230	8642	LVB55	29 L	ARK CTY LOC	N
07/29/98	1639	8643	MFWWT	28 T	THROUGH	N
07/29/98	2008	8644	MWTFW	29 T	THROUGH	S
07/29/98	2135	8645	LVO54	29 L	THROUGH	N
07/29/98	2206	8646	YWH62	29 Y	YARD/WORK	S
07/29/98	2311	8647	YWH62	29 Y	YARD/WORK	N
07/30/98	0027	8648	GSHOCW	27 G	THROUGH	N
07/30/98	0527	8649	GSGVOL	27 G	THROUGH	N
07/30/98	0642	8650	LVB55	30 L	ARK CTY LOC	S
07/30/98	0808	8651	MFWWT	29 T	THROUGH	N
07/30/98	0955	8652	GSWAHO	25 G	THROUGH	S
07/30/98	1036	8653	YWH55	30 Y	YARD/WORK	S
07/30/98	1137	8654	LVB55	30 L	ARK CTY LOC	N
07/30/98	1201	8655	LVO55	30 L	THROUGH	S
07/30/98	1206	8656	YWH55	30 Y	YARD/WORK	N
07/30/98	1556	8657	YWH52	30 Y	YARD/WORK	S
07/30/98	1747	8658	YWH52	30 Y	YARD/WORK	N
07/30/98	1838	8659	GLCOCC	25 G	THROUGH	S
07/30/98	2117	8660	MWTFW	30 T	THROUGH	S
07/30/98	2346	8661	YWH62	30 Y	YARD/WORK	S
07/31/98	0034	8662	YWH62	30 Y	YARD/WORK	N
07/31/98	0649	8663	LVB55	31 L	ARK CTY LOC	S
07/31/98	1203	8664	YWH55	30 Y	YARD/WORK	S
07/31/98	1302	8665	YWH55	30 Y	YARD/WORK	N
07/31/98	1304	8666	LVB55	31 L	ARK CTY LOC	N
07/31/98	1535	8667	MFWWT	30 T	THROUGH	N
07/31/98	2055	8668	MWTFW	31 T	THROUGH	S
07/31/98	2241	8669	YWH62	31 Y	YARD/WORK	S
07/31/98	2307	8670	RWICK	31 O	THROUGH	S
07/31/98	2327	8671	YWH62	31 Y	YARD/WORK	N

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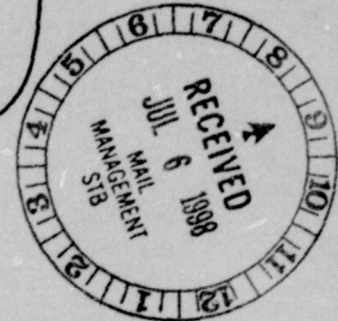
UNION PACIFIC RAILROAD COMPANY

1416 DODGE STREET  
ROOM 830  
OMAHA, NEBRASKA 68179-0001  
FAX (402) 271-5610



July 2, 1998

D



**VIA UPS NEXT DAY AIR**

Mr. Vernon A. Williams, Secretary  
Surface Transportation Board  
1925 K Street NW, Suite 700  
Washington, DC 20423

Re: Finance Docket 32760, UP - Control and Merger - SP

Dear Mr. Williams:

Pursuant to Decision No. 44, UP/SP submits station passing reports for the month of June, 1998 for the cities of Reno, Nevada and Wichita, Kansas. The reports indicate that UP/SP is in compliance with Condition 22.a and Condition 23.a of Exhibit G to Decision No. 44.

	<u>Reno</u>	<u>Wichita</u>
Cap	14.7	6.4
Average Through Freight Trains	12.0	3.97

The attached original and 20 copies of the verified reports include the details for both included and excluded trains for each day during June.

Very truly yours,

*Louise A. Rinn*  
Louise A. Rinn  
General Commerce Counsel  
(402) 271-4227

ENTERED  
Office of the Secretary

JUL 06 1998

Part of  
Public Record

Attachments

C: (With attachments)

PERSONAL (2 copies)  
Elaine Kaiser  
Section of Environmental Analysis  
Surface Transportation Board  
1925 K Street, NW  
Washington, DC 20423-0001

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Washington, DC 20044

(With Wichita Report)  
Bill Stockwell  
Metropolitan Planning Department  
City Hall  
455 North Main Street  
Wichita, KS 67202

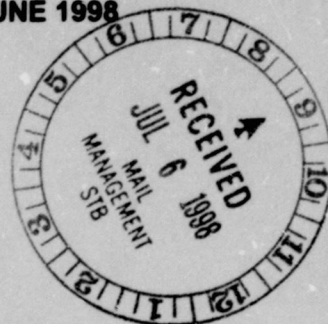




# RECAP OF PASSING REPORTS FOR MONTH OF JUNE 1998

RENO, NEVADA

DATE	FREIGHT
1-Jun	13
2-Jun	13
3-Jun	8
4-Jun	15
5-Jun	14
6-Jun	19
7-Jun	10
8-Jun	14
9-Jun	7
10-Jun	13
11-Jun	12
12-Jun	10
13-Jun	12
14-Jun	13
15-Jun	8
16-Jun	11
17-Jun	14
18-Jun	9
19-Jun	10
20-Jun	15
21-Jun	11
22-Jun	12
23-Jun	14
24-Jun	14
25-Jun	10
26-Jun	11
27-Jun	14
28-Jun	8
29-Jun	12
30-Jun	13



FREIGHT TRAIN MONTH TO DATE AVERAGE

12.0

## AUTHENTICATION:

I certify under penalty of perjury that the foregoing record is true and correct and compiled from records maintained by SPT Company in the usual and ordinary course of business.

Don K. Shaddock 7-2-98  
 General Superintendent Date  
 Western region - Harriman Dispatch Center



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Monday June 1, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSTNPB-29	12:30 AM	2MROSTB-31	1:00 AM
2MSTNPB-30	5:30 AM	3MROSTB-30	2:40 AM
1AOAKS-31	4:50 AM	1MROSTB-30	6:05 AM
1GTJUP-30	6:15 AM	1CCOPN-30	11:00 AM
1MRVRO-21	11:05 AM	12G1OA-2 J	1:40 PM
1MSTNPB-31	8:05 PM	2MNPSTB-31	3:55 PM
1SSFIF-30	11:20 PM		

**EAST TRAINS:** 7  
**TOTAL FREIGHT TRAINS:** 13

**WEST TRAINS:** 6

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0510 PM)	1
PSGR TRAINS: (#5 RENO 1039 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Tuesday June 2, 1998**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1CRIGV-01	1:55 AM	1AKSBE-29	3:10 AM
2MSTNPB-29	5:10 AM	1MROSTB-31	6:40 AM
2AOAKS-01	4:00 AM	2MROSTB-01	3:30 PM
2GBKOG-31	6:10 AM	1ZG1OA-31	3:10 PM
1AOAKS-01	8:35 AM	1GUPPY-26	10:05 PM
1ZOACH-02	11:30 AM		
2MSTNPB-01	7:00 PM		
1GSGOVJ-01	9:05 PM		

**EAST TRAINS:** 8  
**TOTAL FREIGHT TRAINS:** 13

**WEST TRAINS:** 5

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0512 PM)	1
PSGR TRAINS: (#5 RENO 1046 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Wednesday June 3, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-01	12 40 AM	1AKSBE-30	4 40 AM
1GBKOG-21	4 10 AM	1ZG10A-01	4 15 PM
1AOAKS-02	5 45 AM	1AKSBE-31	9 50 PM
1ZOACH-03	1 35 PM		
1MRVRO-02	4 45 PM		

<b>EAST TRAINS:</b>	<b>5</b>	<b>WEST TRAINS:</b>	<b>3</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>8</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0500 PM)	1
PSGR TRAINS: (#5 RENO 1040 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Thursday June 4, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1SSFIF-01	7:20 AM	2GIPBK-28	1:50 AM
1AOAKS-03	6:00 AM	1MNPSTB-31	3:50 AM
2GBKOG-03	8:10 AM	1ANPOG-01	1:20 PM
1AMINP-03	11:40 AM	1GUPBK-28	1:40 PM
1ZOACH-04	2:15 PM	1ANPCS-02	7:50 PM
1IOGSC-03	8:45 PM	1ZG1OA-02	9:15 PM
1IOSAP-04	11:05 PM	1AKSBE-01	11:50 PM
2IOSAP-04	11:55 PM		

**EAST TRAINS:** 8  
**TOTAL FREIGHT TRAINS:** 15

**WEST TRAINS:** 7

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0510 PM)	1
PSGR TRAINS: (#5 RENO 0213PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WBKOGT-03	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	2
<b>TOTAL:</b>	<b>5</b>

v5

**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Friday June 5, 1993**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-03	6:55 AM	3MNPSTB-31	3:25 AM
1ILTME-04	4:35 AM	3MNPSTB-30	10:00 AM
1AOAKS-04	6:50 AM	1MROSTB-02	6:15 PM
1MSTNPB-03	10:50 AM	1ZG1OA-03	9:05 PM
1AMINP-04	1:00 PM		
1ZOACH-05	2:35 PM		
1IOSSC-04	5:25 PM		
1MSGNVJ-02	7:00 PM		
1GPYHF-02	9:00 PM		
1MSTRO-03	11:15 PM		
<b>EAST TRAINS:</b>	<b>10</b>	<b>WEST TRAINS:</b>	<b>4</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>14</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

<b>PSGR TRAINS: (#6 RENO 0452 PM)</b>	<b>1</b>
<b>PSGR TRAINS: (#5 RENO 1018 AM)</b>	<b>1</b>
<b>YARD ENGINES:</b>	<b>0</b>
<b>HELPERS:</b>	<b>0</b>
<b>LITE ENGINE:</b>	<b>0</b>
<b>WORK TRAINS: WGBKJ-30</b>	<b>1</b>
<b>SNOW EQUIPMENT:</b>	<b>0</b>
<b>DETOUR TRAINS:</b>	<b>0</b>
<b>SWITCH</b>	<b>0</b>
<b>TOTAL:</b>	<b>3</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Saturday June 6, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1AOAKSB-05	8:05 AM	2MROSTB-03	2:20 AM
1AMINP-05	11:40 AM	2MNPSTB-03	4:50 AM
1GSSTNP-01	9:15 AM	1GUPBK-30	7:35 AM
1ILTME-05	9:30 AM	1AKSBE-03	8:35 AM
1MRBBDV-01	4:35 PM	3GUPBK-30	12:45 PM
1ZOACH-06	12:10 PM	1ZG1OA-04	2:45 PM
1MRVRO-04	9:55 PM	2MNPSTB-02	6:45 PM
1IOSSC-05	10:05 PM	2MROSTB-06	11:30 PM
1MSTNPB-04	10:10 PM	2GUPBK-30	11:55 PM
1MSTNPB-06	11:30 PM		
<b>EAST TRAINS:</b>	<b>10</b>	<b>WEST TRAINS:</b>	<b>9</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>19</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0504 PM)	1
PSGR TRAINS: (#5 RENO 1054 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Sunday June 7, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSGPVJ-03	5:40 PM	1MNPSTB-04	4:45 AM
1AMINP-06	11:05 AM	1MROSTBK-04	11:40 AM
1MSTNP-05	10:30 AM	1MNPSTBK-01	5:45 PM
1AOAKS-06	11:05 AM	1ZG1OA-05	5:25 PM
1ZOACH-07	12:31 PM		
1MRVRO-06	9:00 PM		

<b>EAST TRAINS:</b>	<b>6</b>	<b>WEST TRAINS:</b>	<b>4</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>10</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0528 PM)	1
PSGR TRAINS: (#5 RENO 1117 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Monday June 8, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1SSFCH-03	1:05 AM	1AKSBE-04	2:45 AM
2AOAKS-04	12:50 AM	4MROSTBK-03	7:20 AM
1MRVRO-05	6:10 AM	1ZG1Q0A-06	3:50 PM
1AOAKS-07	8:30 AM	1AKSBE-05	4:25 PM
2AOAKS-06	9:35 AM	2MROSTB-08	5:15 PM
1MSTNPB-07	11:35 AM		
1SSFIF-06	5:50 AM		
1CGSDUJ-08	4:10 PM		
1MRVRO-07	10:15 PM		

**EAST TRAINS:** 9  
**TOTAL FREIGHT TRAINS:** 14

**WEST TRAINS:** 5

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0525 PM)	1
PSGR TRAINS: (#5 RENO 1112 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Tuesday June 9, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1AOAKS-08	5:35 AM	1MROSTB-07	12:15 AM
1GPYUP-07	4:10 PM	2GUPTZ-03	4:50 AM
1ZOACH-09	1:00 PM	1AKSBE-06	9:50 PM
1UPTJOJ-09	2:15 PM		

<b>EAST TRAINS:</b>	<b>4</b>	<b>WEST TRAINS:</b>	<b>3</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>7</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0444 PM)	1
PSGR TRAINS: (#5 RENO 1043 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: 1WGBKT-07	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Wednesday June 10, 1998**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
2SSFIF-08	2:40 AM	1ZG10A-07	12:45 AM
2AOAKS-07	7:20 AM	1GUPTJ-04	1:00 AM
1AOAKS-09	7:30 AM	1MNPSTB-06	3:50 AM
2GBKOG-08	10:15 AM	1MROSTB-08	6:15 AM
1MSGDVJ-04	11:10 AM	1ZG10A-08	3:25 PM
1ZOACH-10	11:45 AM	1GUPIZ-06	21:35
2MSTNPB-09	4:15 PM		

**EAST TRAINS:** 7  
**TOTAL FREIGHT TRAINS:** 13

**WEST TRAINS:** 6

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0532 PM)	1
PSGR TRAINS: (#5 RENO 1021 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	2
<b>TOTAL:</b>	<b>4</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Thursday June 11, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MSTNPB-08	5:20 AM	1AKSBE-07	1:40 AM
2AOAKS-10	8:10 AM	1CSKRV-10	6:05 AM
1AOAKS-10	8:25 AM	1GUPTJ-05	10:30 AM
1ZOACH-11	11:50 AM	1SIFOA-11	11:05 AM
1AMINP-10	3:45 PM	1ZG1OA-09	3:20 PM
1GSGVJ-11	9:30 PM	1MNPSTB-07	3:25 PM

**EAST TRAINS:** 6  
**TOTAL FREIGHT TRAINS:** 12

**WEST TRAINS:** 6

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0513 PM)	1
PSGR TRAINS: (#5 RENO 0147 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WBKOGT-10	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Friday June 12, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-09	9:05 AM	1MROSTB-09	2:30 AM
1AQAKSB-11	9:55 AM	1AKSBE-09	4:05 AM
1MRVRO-10	4:15 PM	1MROSTB-10	10:45 AM
1ZOACH-12	1:05 PM	1MNPSTB-08	2:10 PM
2MSTNPB-07	8:35 PM	1ZG1OA-10	7:15 PM

**EAST TRAINS:** 5  
**TOTAL FREIGHT TRAINS:** 10

**WEST TRAINS:** 5

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0531 PM)	1
PSGR TRAINS: (#5 RENO 1242 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Saturday June 13, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-11	1:30 AM	2AKSBE-09	2:08 PM
1AMINP-12	12:00 PM	1ZG1OA-11	4:09 PM
1ZOACH-13	11:20 AM	1MROSTB-11	5:45 PM
1UPTJOJ-11	1:40 PM	1AKSBE-10	8:40 PM
1MSTNPB-12	6:20 PM		
1AOAKSB-12	1:15 PM		
1GBKOG-11	8:50 PM		
1GBKOG-10	9:15 PM		

**EAST TRAINS:** 8  
**TOTAL FREIGHT TRAINS:** 12

**WEST TRAINS:** 4

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0539 PM)	1
PSGR TRAINS: (#5 RENO 1114 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Sunday June 14, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

EASTWARD : TRAIN ID	RENO(EST)	WESTWARD : TRAIN ID	RENO(EST)
1AOAKS-13	5:50 AM	1MNPSTB-09	12:35 AM
1AMINP-13	7:30 AM	2MNPSTB-10	5:20 AM
1GTZUP-12	8:40 AM	1AKSBE-11	3:15 PM
1ZOACH-14	10:50 AM	1MRSTBK-12	4:25 PM
1MSTNPB-13	3:35 PM	1GUPBK-10	8:35 PM
2MRVRO-12	6:20 PM	1ZG1OA-12	9:55 PM
1GSGDV-14	8:20 PM		



EAST TRAINS: 7  
 TOTAL FREIGHT TRAINS: 13

WEST TRAINS: 6

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0455 PM)	1
PSGR TRAINS: (#5 RENO 1110 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Monday June 15, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1AMINP-14	9:05 AM	1MROSTB-13	6:30 PM
1MSTNPB-14	4:30 AM		
1AOAKS-14	8:15 AM		
1CRIGV-11	1:35 PM		
2MSTNPB-14	4:55 PM		
1GBKOG-14	4:03 PM		
1MRVRO-13	10:50 PM		

<b>EAST TRAINS:</b>	<b>7</b>	<b>WEST TRAINS:</b>	<b>1</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>8</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0614 PM)	1
PSGR TRAINS: (#5 RENO 1026 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WGBKT-13	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	2
<b>TOTAL:</b>	<b>5</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Tuesday June 16, 1998**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
2AO/KS-12	11:46 AM	12G10A-13	1:55 AM
1MSTNPB-15	6:30 AM	3MNPSTB-12	2:25 AM
1SSFIF-10	7:35 AM	2AKSOA-15	5:40 AM
1AOAKS-15	9:05 AM		
1MLANP-06	11:20 AM		
1MRVRO-12	4:20 PM		
1ZOACH-16	12:05 PM		
1MLANP-11	10:20 PM		

<b>EAST TRAINS:</b>	<b>8</b>	<b>WEST TRAINS:</b>	<b>3</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>11</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0504 PM)	1
PSGR TRAINS: (#5 RENO 1108 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Wednesday June 17, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1GSGKVJ-16	1:23 AM	1ZG10A-14	2:55 AM
2GRKOG-15	5:15 AM	1AKSBE-13	12:30 AM
1AOAKS-16	8:20 AM	2MNPSTR-12	4:25 AM
1ZOACH-17	11:05 AM	1CSKST-15	7:10 AM
1ALAKC-14	5:25 PM	1MROSTB-14	1:00 PM
2GBKOG-15	7:20 PM	1ZG10A-15	3:40 PM
1MRVRO-14	10:10 PM	1MNPSTB-12	10:25 PM

<b>EAST TRAINS:</b>	<b>7</b>	<b>WEST TRAINS:</b>	<b>7</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>14</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

<b>PSGR TRAINS: (#6 RENO 0504 PM)</b>	<b>1</b>
<b>PSGR TRAINS: (#5 RENO 0333 PM)</b>	<b>1</b>
<b>YARD ENGINES:</b>	<b>0</b>
<b>HELPERS:</b>	<b>0</b>
<b>LITE ENGINE:</b>	<b>0</b>
<b>WORK TRAINS:</b>	<b>0</b>
<b>SNOW EQUIPMENT:</b>	<b>0</b>
<b>DETOUR TRAINS:</b>	<b>0</b>
<b>SWITCH</b>	<b>2</b>
<b>TOTAL:</b>	<b>4</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Thursday June 18, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
2MRVRO-13	5:25 AM	1MROSTBK-15	1:50 AM
1AQAKS-17	6:10 AM	1AKSBE-15	1:50 PM
1GSGDVJ-17	9:15 AM	1AKSBE-12	6:55 PM
1ZOACH-18	11:45 AM	1ZG1OA-16	10:55 PM
1MSTNPB-17	11:00 PM		

**EAST TRAINS:**  
**TOTAL FREIGHT TRAINS:**

**5**  
**9**

**WEST TRAINS:** **4**

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0547 PM)	1
PSGR TRAINS: (#5 RENO 1220 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WBKOGT-17	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Friday June 19, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS):**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
2MRVRO-14	5:50 AM	1AKSBE-16	12:30 PM
1UPTSOS-18	6:20 AM	1ZG1OA-17	10:05 PM
1GTZUP-11	8:50 AM		
1SSFCH-15	11:10 AM		
1ZOACH-19	12:00 PM		
1MRVRO-15	4:25 PM		
2AOAKS-18	6:30 PM		
1MSTNPB-18	10:30 PM		

<b>EAST TRAINS:</b>	<b>8</b>	<b>WEST TRAINS:</b>	<b>2</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>10</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0634 PM)	1
PSGR TRAINS: (#5 RENO 0903 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Saturday June 20, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1AMINP-19	8:20 PM	1MNPSTB-14	1:00 AM
1GSGDVJ-19	12:40 PM	1GUPPY-13	10:00 AM
1AOAKSB-19	8:30 PM	1MROSTB-17	12:25 PM
1ZOACH-20	12:20 PM	1MNPSTB-15	2:00 PM
2MRVRO-20	3:25 PM	1AKSBE-171	2:40 PM
1CRIGV-16	10:50 AM	1ZG1OA-18	6:30 PM
1GBKOG-18	6:28 PM	1MROSTB-18	11:55 PM
1MRVRO-19	3:25 AM		

<b>EAST TRAINS:</b>	<b>8</b>	<b>WEST TRAINS:</b>	<b>7</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>15</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS:(#6 RENO 0550 PM)	1
PSGR TRAINS: NONE	0
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>1</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Sunday June 21, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-17	12:55 AM	1MNPSTB-13	1:45 AM
1GSGDVJ-20	6:20 AM	1MNPSTB-17	4:20 AM
1AMINP-20	6:50 AM	1MROSTBK-19	11:15 AM
1ZOACH-21	11:45 AM	1ZG1OA-19	9:55 PM
2MRVROK-20	3:20 PM		
1SSFCH-17	3:00 PM		
1AOAKS-20	5:35 PM		

<b>EAST TRAINS:</b>	<b>7</b>	<b>WEST TRAINS:</b>	<b>4</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>11</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS:	0
PSGR TRAINS: (#5 RENO 0205 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	2
<b>TOTAL:</b>	<b>3</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Monday June 22, 1998**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-18	12:05 AM	1CCOPN-17	2:15 AM
1MRVRO-19	3:10 AM	1AKSBE-18	3:10 AM
1AOAKS-21	8:50 AM	2MRSTB-20	1:30 PM
1CRIGV-19	10:00 AM	1MRSTB-20	3:25 PM
1SSFIF-20	4:45 PM	1ZG1OA-20	6:25 PM
1GSGDVJ-21	7:25 PM		
1MRVRO-21	10:25 PM		

**EAST TRAINS:** 7  
**TOTAL FREIGHT TRAINS:** 12

**WEST TRAINS:** 5

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0540 PM)	1
PSGR TRAINS: (#5 RENO 0717 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	2
<b>TOTAL:</b>	<b>4</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Tuesday June 23, 1998**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-20	6:40 AM	1MNPSTB-11	12:05 PM
1GTJUP-15	5:30 AM	1AKSBE-19	8:50 PM
1CLXUW-17	1:40 AM	1GUPBK-13	10:15 AM
2MRVRO-22	9:25 AM	1MNPSTB-18	2:30 PM
1AOAKS-22	7:45 AM	1ZG1OA-21	4:40 PM
1ZOACH-23	12:05 PM	1AKSBE-20	6:10 PM
1MSTNPB-21	6:20 PM		
1MRVRO-22	10:50 PM		

<b>EAST TRAINS:</b>	<b>8</b>	<b>WEST TRAINS:</b>	<b>6</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>14</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

<b>PSGR TRAINS: (#6 RENO 0527 PM)</b>	<b>1</b>
<b>PSGR TRAINS: (#5 RENO 0220 PM)</b>	<b>1</b>
<b>YARD ENGINES:</b>	<b>0</b>
<b>HELPERS:</b>	<b>0</b>
<b>LITE ENGINE:</b>	<b>0</b>
<b>WORK TRAINS: WOGBKT-21</b>	<b>1</b>
<b>SNOW EQUIPMENT:</b>	<b>0</b>
<b>DETOUR TRAINS:</b>	<b>0</b>
<b>SWITCH</b>	<b>0</b>
<b>TOTAL:</b>	<b>3</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Wednesday June 24, 1998**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

EASTWARD : TRAIN ID	RENO(EST)
UPTJOJ-23	2:40 AM
GPYUP-23	5:20 AM
AOAKS-23	11:40 AM
ZOACH-24	11:40 AM
MSTNPB-19	7:35 PM
SSFEH-22	11:25 PM

WESTWARD : TRAIN ID	RENO(EST)
MNPSTB-18	2:30 PM
AKSBE-20	6:10 PM
1GUPTJ-16	4:40 AM
MROSTB-21	1:00 AM
2MNPSTB-19	1:40 PM
ZG1OA-22	5:25 PM
AKSBE-22	5:45 PM
CSKST-20	9:50 PM

EAST TRAINS:	6
TOTAL FREIGHT TRAINS:	14

WEST TRAINS:	8
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**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0510 PM)	1
PSGR TRAINS: (#5 RENO 1221 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	2
<b>TOTAL:</b>	<b>4</b>



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**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Thursday June 25, 1998**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS):**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
10EKO-22	2:20 AM	1GUPBK-19	11:55 AM
1CRIOV-20	2:55 AM	1MNPSTB-19	5:25 PM
1MSTNPB-22	8:50 AM	ZG10A-23	10:45 PM
1CRIGV-24	7:45 PM		
1AOAKS-24	11:20 AM		
1ZOACH-25	11:50 AM		
1GSGDVJ-24	12:35 PM		

**EAST TRAINS:** 7  
**TOTAL FREIGHT TRAINS:** 10

**WEST TRAINS:** 3

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0510 PM)	1
PSGR TRAINS: (#5 RENO 1830 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

v5  
TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO  
Friday June 26, 1998

CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)

EASTWARD : TRAIN ID	RENO(EST)	WESTWARD : TRAIN ID	RENO(EST)
2MRVRO-24	8:50 AM	1MROSTB-23	4:45 AM
1ZOACH-26	11:40 AM	1AKSOA-25	7:15 AM
1AOAKSB-25	12:50 PM	1AKSBE-21	7:20 AM
1UPTJOJ-25	1:10 PM	2MROST3-24	3:40 PM
1MRVRO-23	4:15 PM	AKSBE-23	4:50 PM
		1ZG1OA-24	6:15 PM

EAST TRAINS:	5	WEST TRAINS:	6
TOTAL FREIGHT TRAINS:	11		

CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):

PSGR TRAINS: (#6 RENO 0540 PM)	1
PSGR TRAINS: (#5 RENO 1250 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
TOTAL:	2

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Saturday, June 27, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1GTZUP-25	2:50 AM	1MNPSTB-20	4:35 AM
1SSFIF-25	4:45 AM	1GUPBK-23	8:05 AM
1MSTNPB-25	7:05 AM	1MNPSTB-22	10:15 AM
1GSGDVJ-26	9:45 AM	1MROSTB-25	12:20 PM
1ZQACH-27	1:30 PM	1AKSBE-24	5:25 PM
1AOAKSB-26	7:35 PM	ZG1OA-25	10:55 PM
2MRVRO-26	6:55 AM		
1GSGDVJ-27	11:00 PM		

**EAST TRAINS:** 8  
**TOTAL FREIGHT TRAINS:** 14

**WEST TRAINS:** 6

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0445 PM)	1
PSGR TRAINS: (#5 RENO 1218 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS: WBKOGT-25	1
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>3</b>



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
 Sunday June 28, 1998

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b>		<b>WESTWARD :</b>	
<b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>TRAIN ID</b>	<b>RENO(EST)</b>
1MRVRO-26	7:25 AM	2GUPBK-23	9:30 AM
1MRVRO-27	2:52 PM	1AKSBE-25	3:14 PM
1ZOACH-28	1:45 PM	1ZG10A-26	5:10 PM
1MSTNPB-26	10:15 PM	1MNPSTB-21	8:10 PM

<b>EAST TRAINS:</b>	<b>4</b>	<b>WEST TRAINS:</b>	<b>4</b>
<b>TOTAL FREIGHT TRAINS:</b>	<b>8</b>		

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0435 PM)	1
PSGR TRAINS: (#5 RENO 1421 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	2
<b>TOTAL:</b>	<b>4</b>

v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Monday June 29, 1998**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
2MRVRO-27	12:20 PM	2MRSTB-28	2:55 AM
1MMNPNX-25	4:20 AM	1MRSTBK-27	9:10 AM
1CRIGV-26	6:10 AM	1CCOPN-27	9:55 AM
1GTSUP-26	9:35 AM	1MNPSTB-25	12:55 PM
1ALAKC-24	2:45 PM	2AKSBE-25	2:55 PM
1MRVRO-28	1:20 PM	1MRSTB-28	11:00 PM

**EAST TRAINS:** 6  
**TOTAL FREIGHT TRAINS:** 12

**WEST TRAINS:** 6

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#5 RENO 0505 AM)	1
PSGR TRAINS: (#5 RENO 0109 PM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

STB FD-32760 7-6-98 D ID-189207 2 OF 2



v5  
**TRAIN MOVEMENT ACTIVITY THROUGH CITY OF RENO**  
**Tuesday June 30, 1998**

**CATEGORY 1 (THROUGH FREIGHT TRAIN MOVEMENTS)**

<b>EASTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>	<b>WESTWARD :</b> <b>TRAIN ID</b>	<b>RENO(EST)</b>
1MLANP-29	12:35 AM	1ZG10A-27	2:50 AM
1MSTNPB-28	9:20 AM	1MNPSTB-26	5:35 AM
2MRVRO-28	8:00 AM	GUPBK-23	12:00 AM
1GBKOG-29	3:05 AM	2 /ROSTB-23	5:35 PM
1SSFIF-28	1:05 AM	1 / KSBEX-26	10:15 PM
1AOAKS-29	1:25 PM		
1ZOACH-30	2:50 PM		
1MSTNPB-29	3:50 PM		

**EAST TRAINS:** 8  
**TOTAL FREIGHT TRAINS:** 13

**WEST TRAINS:** 5

**CATEGORY 2: (LITE ENGINE, WORK TRAINS, YARD ENG, HELPER, SNOW EQUIPMENT, LOCALS ETC):**

PSGR TRAINS: (#6 RENO 0845 PM)	1
PSGR TRAINS: (#5 RENO 1149 AM)	1
YARD ENGINES:	0
HELPERS:	0
LITE ENGINE:	0
WORK TRAINS:	0
SNOW EQUIPMENT:	0
DETOUR TRAINS:	0
SWITCH	0
<b>TOTAL:</b>	<b>2</b>

VERIFICATION

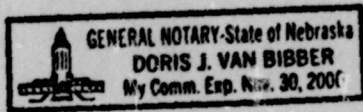
STATE OF NEBRASKA     )  
                                  ) ss.  
COUNTY OF DOUGLAS    )

Clyde Anderson, being first duly sworn, deposes and says that he has read the foregoing document, knows the facts asserted therein, and that the same are true as stated.

Clyde Anderson  
Clyde Anderson

SUBSCRIBED AND SWORN to before me this 2nd day of July, 1998.

Doris J. Van Bibber  
Notary Public





PROGRAM: FPN127.FOCUS.EXEC(AEIHIST-WHTA-3) 07/01/98 20.15.59

TRANSPORTATION RESEARCH  
AEI SCANNER TRAIN HISTORY SUMMARY FOR SCANNER #359-SOUTH WICHITA  
FOR PERIOD 06/01/98-06/30/98

DATE	THRU TRAINS
06/01/98	5
06/02/98	4
06/03/98	4
06/04/98	5
06/05/98	3
06/06/98	4
06/07/98	3
06/08/98	1
06/09/98	7
06/10/98	3
06/11/98	4
06/12/98	6
06/13/98	4
06/14/98	2
06/15/98	3
06/16/98	7
06/17/98	4
06/18/98	5
06/19/98	3
06/20/98	4
06/21/98	1
06/22/98	2
06/23/98	6
06/24/98	3
06/25/98	5
06/26/98	3
06/27/98	5
06/28/98	4
06/29/98	4
06/30/98	5

\*TOTAL 98

119

\*\* AVG\_THRU\_TRN 3.97

TOTAL

119



PROGRAM: FPAN127.FOCUS.EXEC(AEIHIST-WHTA-4) 07/01/98 20.15.59

TRANSPORTATION RESEARCH  
 AEI SCANNER TRAIN HISTORY DETAIL REPORT FOR SCANNER #359-SOUTH WICHITA  
 FOR PERIOD 06/01/98-06/30/98

DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
06/01/98	0600	8087	MFWWT	31 T	THROUGH	N
06/01/98	0636	8088	LVB55	01 L	ARK CTY LOC	S
06/01/98	0802	8089	MHOKC	29 T	THROUGH	N
06/01/98	0950	8090	YWH55	01 Y	YARD/WORK	S
06/01/98	1101	8091	YWH55	01 Y	YARD/WORK	N
06/01/98	1119	8092	LVB55	01 L	ARK CTY LOC	N
06/01/98	1547	8093	MFWNP	30 T	THROUGH	N
06/01/98	1819	8094	MWTFW	01 T	THROUGH	S
06/01/98	2151	8095	LVO54	01 L	THROUGH	N
06/02/98	0638	8096	LVB55	02 L	ARK CTY LOC	S
06/02/98	1045	8097	LVO55	02 L	THROUGH	S
06/02/98	1051	8098	YWH55	02 Y	YARD/WORK	S
06/02/98	1136	8099	YWH55	02 Y	YARD/WORK	N
06/02/98	1142	8100	LVB55	02 L	ARK CTY LOC	N
06/02/98	1529	8101	RCKWT	02 O	THROUGH	N
06/02/98	1619	8102	MWTFW	02 T	THROUGH	S
06/02/98	2317	8103	RWTCK	02 O	THROUGH	S
06/03/98	0638	8104	LVB55	03 L	ARK CTY LOC	S
06/03/98	0731	8105	MFWNP	01 T	THROUGH	N
06/03/98	1007	8106	YWH55	03 Y	YARD/WORK	S
06/03/98	1047	8107	MFWWT	02 T	THROUGH	N
06/03/98	1120	8108	YWH55	03 Y	YARD/WORK	N
06/03/98	1151	8109	LVB55	03 L	ARK CTY LOC	N
06/03/98	1956	8110	MWTFW	03 T	THROUGH	S
06/03/98	2320	8111	LVO54	03 L	THROUGH	N
06/04/98	0051	8112	MFWNPX	02 T	THROUGH	N
06/04/98	0646	8113	LVB55	04 L	ARK CTY LOC	S
06/04/98	1024	8114	YWH55	04 Y	YARD/WORK	S
06/04/98	1134	8115	YWH55	04 Y	YARD/WORK	N
06/04/98	1137	8116	LVB55	04 L	ARK CTY LOC	N
06/04/98	1204	8117	LVO55	04 L	THROUGH	S
06/04/98	1537	8119	RCKWT	04 O	THROUGH	N
06/04/98	1644	8120	MWTFW	04 T	THROUGH	S
06/04/98	2125	8121	RWTCK	04 O	THROUGH	S
06/05/98	0634	8122	LVB55	05 L	ARK CTY LOC	S
06/05/98	1012	8123	YWH62	04 Y	YARD/WORK	S
06/05/98	1109	8124	YWH62	04 Y	YARD/WORK	N
06/05/98	1233	8125	LVB55	05 L	ARK CTY LOC	N
06/05/98	1648	8126	MFWWT	04 T	THROUGH	N
06/05/98	1814	8127	MWTFW	05 T	THROUGH	S
06/05/98	2213	8128	LVO54	05 L	THROUGH	N
06/05/98	2256	8129	YWH62	04 Y	YARD/WORK	S
06/05/98	2318	8130	YWH62	04 Y	YARD/WORK	N
06/06/98	0327	8131	MFWNP	04 T	THROUGH	N
06/06/98	0633	8132	LVB55	06 L	ARK CTY LOC	S

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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
06/06/98	0946	8133	LVB55	06 L	ARK CTY LOC	N
06/06/98	1024	8134	MFWWT	05 T	THROUGH	N
06/06/98	1045	8135	LVO55	06 L	THROUGH	S
06/06/98	1114	8136	YWH62	04 Y	YARD/WORK	S
06/06/98	1224	8137	YWH62	04 Y	YARD/WORK	N
06/06/98	1502	8138	YWH55	06 Y	YARD/WORK	S
06/06/98	1519	8139	MWTFW	06 T	THROUGH	S
06/06/98	1652	8140	YWH55	06 Y	YARD/WORK	N
06/06/98	2202	8141	YWH62	06 Y	YARD/WORK	S
06/06/98	2247	8142	YWH62	06 Y	YARD/WORK	N
06/07/98	0207	8143	MFWNP	05 T	THROUGH	N
06/07/98	0923	8144	YWH55	07 Y	YARD/WORK	S
06/07/98	1100	8145	YWH55	07 Y	YARD/WORK	N
06/07/98	1812	8146	MWTFW	07 T	THROUGH	S
06/07/98	2142	8147	YWH60	07 Y	YARD/WORK	S
06/07/98	2229	8148	YWH60	07 Y	YARD/WORK	N
06/07/98	2240	8149	GSGVOL	03 G	THROUGH	N
06/08/98	0514	8150	GSGVAB	04 G	THROUGH	N
06/08/98	0639	8151	LVB55	08 L	ARK CTY LOC	S
06/08/98	0935	8152	YWH55	08 Y	YARD/WORK	S
06/08/98	1053	8153	YWH55	08 Y	YARD/WORK	N
06/08/98	1129	8154	LVB55	08 L	ARK CTY LOC	N
06/08/98	2132	8155	YWH62	08 Y	YARD/WORK	S
06/08/98	2206	8156	YWH62	08 Y	YARD/WORK	N
06/09/98	0359	8157	LVO54	08 L	THROUGH	N
06/09/98	0632	8158	LVB55	09 L	ARK CTY LOC	S
06/09/98	0758	8159	GSSIHO	06 G	THROUGH	S
06/09/98	0928	8160	YWH55	09 Y	YARD/WORK	S
06/09/98	1027	8161	LVB55	09 L	ARK CTY LOC	N
06/09/98	1052	8162	YWH55	09 Y	YARD/WORK	N
06/09/98	1132	8163	YWH55	09 Y	YARD/WORK	S
06/09/98	1344	8164	LVO55	09 L	THROUGH	S
06/09/98	1532	8165	RCKWT	09 O	THROUGH	N
06/09/98	1813	8166	MFWWT	06 T	THROUGH	N
06/09/98	2108	8167	MWTFW	09 T	THROUGH	S
06/09/98	2249	8168	RWICK	09 O	THROUGH	S
06/09/98	2355	8169	YWH62	09 Y	YARD/WORK	S
06/10/98	0031	8170	YWH62	09 Y	YARD/WORK	N
06/10/98	0359	8171	MFWNP	08 T	THROUGH	N
06/10/98	0635	8172	LVB55	10 L	ARK CTY LOC	S
06/10/98	0959	8173	YWH55	10 Y	YARD/WORK	S
06/10/98	1131	8174	YWH55	10 Y	YARD/WORK	N
06/10/98	1145	8175	LVB55	10 L	ARK CTY LOC	N
06/10/98	1448	8176	MHOKC	08 T	THROUGH	N
06/10/98	2005	8177	MWTFW	10 T	THROUGH	S



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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
06/10/98	2249	8178	YWH62	10 Y	YARD/WORK	S
06/10/98	2319	8179	YWH62	10 Y	YARD/WORK	N
06/11/98	0016	8180	LVO54	10 L	THROUGH	N
06/11/98	0637	8181	LVB55	11 L	ARK CTY LOC	S
06/11/98	0946	8182	YWH55	11 Y	YARD/WORK	S
06/11/98	1102	8183	YWH55	11 Y	YARD/WORK	N
06/11/98	1117	8184	LVO55	11 L	THROUGH	S
06/11/98	1219	8185	LVB55	11 L	ARK CTY LOC	N
06/11/98	1529	8186	RCKWT	11 O	THROUGH	N
06/11/98	2110	8187	RWTCK	11 O	THROUGH	S
06/11/98	2159	8188	YWH62	11 Y	YARD/WORK	S
06/11/98	2243	8189	YWH62	11 Y	YARD/WORK	N
06/12/98	0206	8190	MFWWT	09 T	THROUGH	N
06/12/98	0239	8191	MFWWT	10 T	THROUGH	N
06/12/98	0635	8192	MWTFW	11 T	THROUGH	S
06/12/98	0639	8193	LVB55	12 L	ARK CTY LOC	S
06/12/98	1013	8194	LVB55	12 L	ARK CTY LOC	N
06/12/98	1355	8195	WJCCSB	08 B	YARD/WORK	S
06/12/98	1829	8196	GECYEL	09 G	THROUGH	S
06/12/98	1947	8197	MWTFW	12 T	THROUGH	S
06/12/98	2204	8198	YWH62	12 Y	YARD/WORK	S
06/12/98	2248	8199	YWH62	12 Y	YARD/WORK	N
06/13/98	0115	8200	MFWNP	11 T	THROUGH	N
06/13/98	0641	8201	LVB55	13 L	ARK CTY LOC	S
06/13/98	0903	8202	GSOLGV	10 G	THROUGH	S
06/13/98	0929	8203	YWH55	13 Y	YARD/WORK	S
06/13/98	1013	8204	YWH55	13 Y	YARD/WORK	N
06/13/98	1259	8205	LVB55	13 L	ARK CTY LOC	N
06/13/98	1646	8206	MWTFW	13 T	THROUGH	S
06/13/98	2224	8207	YWH62	13 Y	YARD/WORK	S
06/13/98	2249	8208	YWH62	13 Y	YARD/WORK	N
06/13/98	2341	8209	MFWWT	12 T	THROUGH	N
06/14/98	0339	8210	MFWWT	11 T	THROUGH	N
06/14/98	1734	8211	MWTFW	14 T	THROUGH	S
06/14/98	2123	8212	YWH60	14 Y	YARD/WORK	S
06/14/98	2159	8213	YWH60	14 Y	YARD/WORK	N
06/15/98	0056	8214	MFWWT	08 T	THROUGH	N
06/15/98	0654	8215	LVB55	15 L	ARK CTY LOC	S
06/15/98	1157	8216	MFWWT	13 T	THROUGH	N
06/15/98	1837	8217	MWTFW	15 T	THROUGH	S
06/15/98	2240	8218	YWH62	15 Y	YARD/WORK	S
06/15/98	2313	8219	YWH62	15 Y	YARD/WORK	N
06/16/98	0059	8220	LVO54	15 L	THROUGH	N
06/16/98	0639	8221	LVB55	16 L	ARK CTY LOC	S
06/16/98	0913	8222	YWH55	16 Y	YARD/WORK	S



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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
06/16/98	1020	8223	LVB55	16 L	ARK CTY LOC	N
06/16/98	1059	8224	YWH55	16 Y	YARD/WORK	N
06/16/98	1123	8225	LVO55	16 L	THROUGH	S
06/16/98	1409	8226	MHOKC	12 T	THROUGH	N
06/16/98	1538	8227	RCKWT	16 O	THROUGH	N
06/16/98	1759	8228	MWTFW	16 T	THROUGH	S
06/16/98	2025	8229	RWICK	16 O	THROUGH	S
06/16/98	2120	8230	MFWWT	15 T	THROUGH	N
06/16/98	2259	8231	YWH62	16 Y	YARD/WORK	S
06/16/98	2344	8232	YWH62	16 Y	YARD/WORK	N
06/17/98	0636	8233	LVB55	17 L	ARK CTY LOC	S
06/17/98	1017	8234	YWH55	17 Y	YARD/WORK	S
06/17/98	1055	8235	YWH55	17 Y	YARD/WORK	N
06/17/98	1104	8236	LVB55	17 L	ARK CTY LOC	N
06/17/98	1817	8237	MWTFW	17 T	THROUGH	S
06/17/98	2032	8238	MFWWT	16 T	THROUGH	N
06/17/98	2124	8239	GSHOWA	14 G	THROUGH	N
06/17/98	2238	8240	YWH62	17 Y	YARD/WORK	S
06/17/98	2307	8241	YWH62	17 Y	YARD/WORK	N
06/17/98	2331	8242	LVO54	17 L	THROUGH	N
06/18/98	0334	8243	GLBYHO	12 G	THROUGH	S
06/18/98	0650	8244	LVB55	18 L	ARK CTY LOC	S
06/18/98	1044	8245	YWH55	18 Y	YARD/WORK	S
06/18/98	1114	8246	YWH55	13 Y	YARD/WORK	N
06/18/98	1202	8247	LVB55	18 L	ARK CTY LOC	N
06/18/98	1219	8248	LVO55	18 L	THROUGH	S
06/18/98	1457	8249	RCKWT	18 O	THROUGH	N
06/18/98	1637	8250	MWTFW	18 T	THROUGH	S
06/18/98	2057	8251	RWICK	18 O	THROUGH	S
06/19/98	0214	8252	MFWWT	17 T	THROUGH	N
06/19/98	0636	8253	LVB55	19 L	ARK CTY LOC	S
06/19/98	1009	8254	LVB55	19 L	ARK CTY LOC	N
06/19/98	1030	8255	YWH55	19 Y	YARD/WORK	S
06/19/98	1130	8256	YWH55	19 Y	YARD/WORK	N
06/19/98	1638	8257	MWTFW	19 T	THROUGH	S
06/19/98	2204	8258	YWH62	19 Y	YARD/WORK	S
06/19/98	2301	8259	YWH62	19 Y	YARD/WORK	N
06/19/98	2327	8260	LVO54	19 L	THROUGH	N
06/20/98	0636	8261	LVB55	20 L	ARK CTY LOC	S
06/20/98	0722	8262	MFWWT	18 T	THROUGH	N
06/20/98	1006	8263	YWH55	20 Y	YARD/WORK	S
06/20/98	1040	8264	YWH55	20 Y	YARD/WORK	N
06/20/98	1107	8265	LVO55	20 L	THROUGH	S
06/20/98	1302	8266	LVB55	20 L	ARK CTY LOC	N
06/20/98	1518	8267	YWH55	20 Y	YARD/WORK	S

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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
06/20/98	1656	8268	YWH55	20 Y	YARD/WORK	N
06/20/98	1843	8269	MWTFW	20 T	THROUGH	S
06/20/98	2235	8270	MFWWT	19 T	THROUGH	N
06/20/98	2253	8271	YWH62	20 Y	YARD/WORK	S
06/20/98	2323	8272	YWH62	20 Y	YARD/WORK	N
06/21/98	0524	8273	GSGVOL	17 G	THROUGH	N
06/21/98	1016	8274	YWH55	21 Y	YARD/WORK	S
06/21/98	1109	8275	YWH55	21 Y	YARD/WORK	N
06/21/98	1421	8276	YWH55	21 Y	YARD/WORK	S
06/21/98	1636	8277	YWH55	21 Y	YARD/WORK	N
06/21/98	2155	8278	YWH60	21 Y	YARD/WORK	S
06/21/98	2226	8279	YWH60	21 Y	YARD/WORK	N
06/22/98	0011	8280	MFWWT	20 T	THROUGH	N
06/22/98	0642	8281	LVB55	22 L	ARK CTY LOC	S
06/22/98	1048	8282	YWH55	22 Y	YARD/WORK	S
06/22/98	1157	8283	YWH55	22 Y	YARD/WORK	N
06/22/98	1204	8284	LVB55	22 L	ARK CTY LOC	N
06/22/98	2130	8285	YWH62	22 Y	YARD/WORK	S
06/22/98	2157	8286	MWTFW	22 T	THROUGH	S
06/22/98	2223	8287	YWH62	22 Y	YARD/WORK	N
06/23/98	0014	8288	MFWWT	21 T	THROUGH	N
06/23/98	0104	8289	LVO54	22 L	THROUGH	N
06/23/98	0635	8290	LVB55	23 L	ARK CTY LOC	S
06/23/98	1036	8291	YWH55	23 Y	YARD/WORK	S
06/23/98	1111	8292	YWH55	23 Y	YARD/WORK	N
06/23/98	1124	8293	LVO55	23 L	THROUGH	S
06/23/98	1312	8294	LVB55	23 L	ARK CTY LOC	N
06/23/98	1525	8295	RCKWT	23 O	THROUGH	N
06/23/98	1539	8296	MWTFW	23 T	THROUGH	S
06/23/98	2146	8297	RWICK	23 O	THROUGH	S
06/23/98	2331	8298	YWH62	23 Y	YARD/WORK	S
06/24/98	0107	8299	YWH62	23 Y	YARD/WORK	N
06/24/98	0308	8300	GSHOCW	21 G	THROUGH	N
06/24/98	0637	8301	LVB55	24 L	ARK CTY LOC	S
06/24/98	0917	8302	GSWAHO	20 G	THROUGH	S
06/24/98	1056	8303	YWH55	24 Y	YARD/WORK	S
06/24/98	1145	8304	YWH55	24 Y	YARD/WORK	N
06/24/98	1218	8305	LVB55	24 L	ARK CTY LOC	N
06/24/98	1407	8306	YWH55	24 Y	YARD/WORK	S
06/24/98	1630	8307	YWH55	24 Y	YARD/WORK	N
06/24/98	1811	8308	MWTFW	24 T	THROUGH	S
06/24/98	2302	8309	YWH62	24 Y	YARD/WORK	S
06/25/98	0000	8310	YWH62	24 Y	YARD/WORK	N
06/25/98	0639	8311	LVB55	25 L	ARK CTY LOC	S
06/25/98	0943	8312	LVB55	25 L	ARK CTY LOC	N



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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
06/25/98	1046	8313	YWH55	25 Y	YARD/WORK	S
06/25/98	1111	8314	YWH55	25 Y	YARD/WORK	N
06/25/98	1255	8315	MFWWT	22 T	THROUGH	N
06/25/98	1549	8316	RCHWT	25 O	THROUGH	N
06/25/98	1741	8317	MFWWT	24 T	THROUGH	N
06/25/98	1848	8318	MWTFW	25 T	THROUGH	S
06/25/98	1906	8319	GEGVER	11 G	THROUGH	N
06/25/98	2237	8320	YWH62	25 Y	YARD/WORK	S
06/25/98	2329	8321	YWH62	25 Y	YARD/WORK	N
06/26/98	0154	8322	RWTCK	25 O	THROUGH	S
06/26/98	0636	8323	LVB55	26 L	ARK CTY LOC	S
06/26/98	0956	8324	YWH55	26 Y	YARD/WORK	S
06/26/98	1117	8325	YWH55	26 Y	YARD/WORK	N
06/26/98	1220	8326	LVB55	26 L	ARK CTY LOC	N
06/26/98	1325	8327	YWH55	26 Y	YARD/WORK	S
06/26/98	1524	8328	YWH55	26 Y	YARD/WORK	N
06/26/98	1554	8329	MWTFW	26 T	THROUGH	S
06/26/98	2256	8330	YWH62	26 Y	YARD/WORK	S
06/26/98	2302	8331	MFWWT	25 T	THROUGH	N
06/26/98	2328	8332	YWH62	26 Y	YARD/WORK	N
06/27/98	0635	8333	LVB55	27 L	ARK CTY LOC	S
06/27/98	0911	8334	LVO54	26 L	THROUGH	N
06/27/98	0929	8335	GSHUHO	22 G	THROUGH	S
06/27/98	1025	8336	YWH55	27 Y	YARD/WORK	S
06/27/98	1116	8337	YWH55	27 Y	YARD/WORK	N
06/27/98	1319	8338	LVB55	27 L	ARK CTY LOC	N
06/27/98	1358	8339	LVO55	27 L	THROUGH	S
06/27/98	1949	8340	MWTFW	27 T	THROUGH	S
06/27/98	2229	8341	YWH62	27 Y	YARD/WORK	S
06/27/98	2248	8342	YWH62	27 Y	YARD/WORK	N
06/27/98	2350	8343	GSHOWA	22 G	THROUGH	N
06/28/98	0903	8344	YWH55	28 Y	YARD/WORK	S
06/28/98	0939	8345	YWH55	28 Y	YARD/WORK	N
06/28/98	1629	8346	MFWWT	26 T	THROUGH	N
06/28/98	1816	8347	GSOLGV	24 G	THROUGH	S
06/28/98	2201	8348	YWH55	28 Y	YARD/WORK	S
06/28/98	2220	8349	YWH55	28 Y	YARD/WORK	N
06/28/98	2238	8350	MFWWTX	27 T	THROUGH	N
06/28/98	2344	8351	MFWWT	27 T	THROUGH	N
06/29/98	0209	8352	MWTFW	28 T	THROUGH	S
06/29/98	0641	8353	LVB55	29 L	ARK CTY LOC	S
06/29/98	0949	8354	GEHOSR	26 G	THROUGH	N
06/29/98	1037	8355	YWH55	29 Y	YARD/WORK	S
06/29/98	1141	8356	YWH55	29 Y	YARD/WORK	N
06/29/98	1142	8357	LVB55	29 L	ARK CTY LOC	N



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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R
06/29/98	2021	8358	GSHOWA 26	G	THROUGH	N
06/29/98	2324	8359	LVO54 29	L	THROUGH	N
06/30/98	0637	8360	LVB55 30	L	ARK CTY LOC	S
06/30/98	1012	8361	YWH55 30	Y	YARD/WORK	S
06/30/98	1058	8362	YWH55 30	Y	YARD/WORK	N
06/30/98	1212	8363	LVO55 30	L	THROUGH	S
06/30/98	1227	8364	LVB55 30	L	ARK CTY LOC	N
06/30/98	1600	8365	RCKWT 30	O	THROUGH	N
06/30/98	1631	8366	MWTFW 30	T	THROUGH	S
06/30/98	2044	8367	MFWWT 29	T	THROUGH	N
06/30/98	2113	8368	RWICK 30	O	THROUGH	S
06/30/98	2327	8369	YWH62 30	Y	YARD/WORK	S

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TRANSPORTATION RESEARCH  
 AEI SCANNER TRAIN HISTORY SUMMARY FOR SCANNER #359-SOUTH WICHITA  
 FOR PERIOD 06/01/98-06/30/98

DATE	THRU TRAINS	ARK CITY LOCALS	YARD+WORK TRAINS + LITE ENG	UNIDEN- TIFIED TRAINS	TOTAL TRAINS	N.B. MOVES	S.B. MOVES
06/01/98	5	2	2	0	9	6	3
06/02/98	4	2	2	0	8	3	5
06/03/98	4	2	2	0	8	5	3
06/04/98	5	2	2	0	9	4	5
06/05/98	3	2	4	0	9	5	4
06/06/98	4	2	6	0	12	6	6
06/07/98	3	0	4	0	7	4	3
06/08/98	1	2	4	0	7	4	3
06/09/98	7	2	4	0	13	5	8
06/10/98	3	2	5	0	10	6	4
06/11/98	4	2	4	0	10	5	5
06/12/98	6	2	3	0	11	5	6
06/13/98	4	2	4	0	10	5	5
06/14/98	2	0	2	0	4	2	2
06/15/98	3	1	2	0	6	3	3
06/16/98	7	2	4	0	13	7	6
06/17/98	4	2	4	0	10	6	4
06/18/98	5	2	2	0	9	3	6
06/19/98	3	2	4	0	9	5	4
06/20/98	4	2	6	0	12	6	6
06/21/98	1	0	6	0	7	4	3
06/22/98	2	2	4	0	8	4	4
06/23/98	6	2	3	0	11	5	6
06/24/98	3	2	6	0	11	5	6
06/25/98	5	2	5	0	12	8	4
06/26/98	3	2	6	0	11	5	6
06/27/98	5	2	4	0	11	5	6
06/28/98	4	0	4	0	8	5	3
06/29/98	4	2	2	0	8	5	3
06/30/98	5	2	3	0	10	4	6
*TOTAL 98							
	119	51	113	0	283	145	138

\*\* AVG\_THRU\_TRN 3.97

AVG\_TOT\_TRN 9.43

WICHITA-ARKANSAS CITY LOCALS OPERATE VIA ATSF TRACKAGE RIGHTS AND WERE  
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PROGRAM: FPAN127.FOCUS.EXEC(AETIHIST-WHTA-2)  
 DATE RUN: 07/01/98 20.15.59

TRANSPORTATION RESEARCH  
 AEI SCANNER TRAIN HISTORY DETAIL REPORT FOR SCANNER #359-SOUTH WICHITA  
 FOR PERIOD 06/01/98-06/30/98

DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R	LOCO UNITS	CARS	NUM TRNS	
06/01/98	0600	8087	MFWWT	31	T	THROUGH	N	2	31	1
06/01/98	0636	8088	LVB55	01	L	ARK CTY LOC	S	2	27	1
06/01/98	0802	8089	MHOKC	29	T	THROUGH	N	2	53	1
06/01/98	0950	8090	YWH55	01	Y	YARD/WORK	S	1	6	1
06/01/98	1101	8091	YWH55	01	Y	YARD/WORK	N	1	6	1
06/01/98	1119	8092	LVB55	01	L	ARK CTY LOC	N	2	1	1
06/01/98	1547	8093	MFWNP	30	T	THROUGH	N	3	97	1
06/01/98	1819	8094	MWTFW	01	T	THROUGH	S	3	42	1
06/01/98	2151	8095	LVO54	01	L	THROUGH	N	1	8	1
06/02/98	0638	8096	LVB55	02	L	ARK CTY LOC	S	2	22	1
06/02/98	1045	8097	LVO55	02	L	THROUGH	S	1	26	1
06/02/98	1051	8098	YWH55	02	Y	YARD/WORK	S	1	6	1
06/02/98	1136	8099	YWH55	02	Y	YARD/WORK	N	1	10	1
06/02/98	1142	8100	LVB55	02	L	ARK CTY LOC	N	2	40	1
06/02/98	1529	8101	RCKWT	02	O	THROUGH	N	3	0	1
06/02/98	1619	8102	MWTFW	02	T	THROUGH	S	2	65	1
06/02/98	2317	8103	RWTCK	02	O	THROUGH	S	3	0	1
06/03/98	0638	8104	LVB55	03	L	ARK CTY LOC	S	2	26	1
06/03/98	0731	8105	MFWNP	01	T	THROUGH	N	3	103	1
06/03/98	1007	8106	YWH55	03	Y	YARD/WORK	S	1	6	1
06/03/98	1047	8107	MFWWT	02	T	THROUGH	N	3	81	1
06/03/98	1120	8108	YWH55	03	Y	YARD/WORK	N	1	7	1
06/03/98	1151	8109	LVB55	03	L	ARK CTY LOC	N	2	25	1
06/03/98	1956	8110	MWTFW	03	T	THROUGH	S	3	71	1
06/03/98	2320	8111	LVO54	03	L	THROUGH	N	1	19	1
06/04/98	0051	8112	MFWNPX	02	T	THROUGH	N	4	100	1
06/04/98	0646	8113	LVB55	04	L	ARK CTY LOC	S	2	43	1
06/04/98	1024	8114	YWH55	04	Y	YARD/WORK	S	1	3	1
06/04/98	1134	8115	YWH55	04	Y	YARD/WORK	N	1	4	1
06/04/98	1137	8116	LVB55	04	L	ARK CTY LOC	N	2	39	1
06/04/98	1204	8117	LVO55	04	L	THROUGH	S	1	5	1
06/04/98	1537	8119	RCKWT	04	O	THROUGH	N	2	2	1
06/04/98	1644	8120	MWTFW	04	T	THROUGH	S	2	35	1
06/04/98	2125	8121	RWTCK	04	O	THROUGH	S	2	0	1
06/05/98	0634	8122	LVB55	05	L	ARK CTY LOC	S	2	28	1
06/05/98	1012	8123	YWH62	04	Y	YARD/WORK	S	1	15	1

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PROGRAM: FPA127.FOCUS.EXEC(AEIHIST-WHTA-2)

DATE RUN: 07/01/98 20.15.59

TRANSPORTATION RESEARCH  
 AEI SCANNER TRAIN HISTORY DETAIL REPORT FOR SCANNER #359-SOUTH WICHITA  
 FCX PERIOD 06/01/98-06/30/98

DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R	LOCO UNITS	CARS	NUM TRNS	
06/05/98	1109	8124	YWH62	04	Y	YARD/WORK	N	1	7	1
06/05/98	1233	8125	LVB55	05	L	ARK CTY LOC	N	2	19	1
06/05/98	1648	8126	MFWWT	04	T	THROUGH	N	2	100	1
06/05/98	1814	8127	MWTFW	05	T	THROUGH	S	2	66	1
06/05/98	2213	8128	LVO54	05	L	THROUGH	N	3	11	1
06/05/98	2256	8129	YWH62	04	Y	YARD/WORK	S	1	1	1
06/05/98	2318	8130	YWH62	04	Y	YARD/WORK	N	1	0	1
06/06/98	0327	8131	MFWNP	04	T	THROUGH	N	3	77	1
06/06/98	0633	8132	LVB55	06	L	ARK CTY LOC	S	2	29	1
06/06/98	0946	8133	LVB55	06	L	ARK CTY LOC	N	2	31	1
06/06/98	1024	8134	MFWWT	05	T	THROUGH	N	2	78	1
06/06/98	1045	8135	LVO55	06	L	THROUGH	S	3	8	1
06/06/98	1114	8136	YWH62	04	Y	YARD/WORK	S	1	13	1
06/06/98	1224	8137	YWH62	04	Y	YARD/WORK	N	1	11	1
06/06/98	1502	8138	YWH55	06	Y	YARD/WORK	S	1	5	1
06/06/98	1519	8139	MWTFW	06	T	THROUGH	S	2	47	1
06/06/98	1652	8140	YWH55	06	Y	YARD/WORK	N	1	4	1
06/06/98	2202	8141	YWH62	06	Y	YARD/WORK	S	1	5	1
06/06/98	2247	8142	YWH62	06	Y	YARD/WORK	N	1	5	1
06/07/98	0207	8143	MFWNP	05	T	THROUGH	N	3	101	1
06/07/98	0923	8144	YWH55	07	Y	YARD/WORK	S	1	6	1
06/07/98	1100	8145	YWH55	07	Y	YARD/WORK	N	1	2	1
06/07/98	1812	8146	MWTFW	07	T	THROUGH	S	2	65	1
06/07/98	2142	8147	YWH60	07	Y	YARD/WORK	S	1	16	1
06/07/98	2229	8148	YWH60	07	Y	YARD/WORK	N	1	9	1
06/07/98	2240	8149	GSGVOL	03	G	THROUGH	N	2	101	1
06/08/98	0514	8150	GSGVAB	04	G	THROUGH	N	2	99	1
06/08/98	0639	8151	LVB55	08	L	ARK CTY LOC	S	2	32	1
06/08/98	0935	8152	YWH55	08	Y	YARD/WORK	S	1	6	1
06/08/98	1053	8153	YWH55	08	Y	YARD/WORK	N	1	3	1
06/08/98	1129	8154	LVB55	08	L	ARK CTY LOC	N	2	3	1
06/08/98	2132	8155	YWH62	08	Y	YARD/WORK	S	1	1	1
06/08/98	2206	8156	YWH62	08	Y	YARD/WORK	N	1	4	1
06/09/98	0359	8157	LVO54	08	L	THROUGH	N	1	49	1
06/09/98	0632	8158	LVB55	09	L	ARK CTY LOC	S	2	7	1
06/09/98	0758	8159	GSSIHO	06	G	THROUGH	S	4	97	1

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 DATE RUN: 07/01/98 20.15.59

TRANSPORTATION RESEARCH  
 AEI SCANNER TRAIN HISTORY DETAIL REPORT FOR SCANNER #359-SOUTH WICHITA  
 FOR PERIOD 06/01/98-06/30/98

DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R	LOCO UNITS	CARS	NUM TRNS
06/09/98	0928	8160	YWH55	09 Y	YARD/WORK	S	1	2	1
06/09/98	1027	8161	LVB55	09 L	ARK CTY LOC	N	2	49	1
06/09/98	1052	8162	YWH55	09 Y	YARD/WORK	N	1	3	1
06/09/98	1132	8163	YWH55	09 Y	YARD/WORK	S	1	6	1
06/09/98	1344	8164	LVO55	09 L	THROUGH	S	1	9	1
06/09/98	1532	8165	RCKWT	09 O	THROUGH	N	3	2	1
06/09/98	1813	8166	MFWWT	06 T	THROUGH	N	3	53	1
06/09/98	2108	8167	MWTFW	09 T	THROUGH	S	3	13	1
06/09/98	2249	8168	RWICK	09 O	THROUGH	S	2	0	1
06/09/98	2355	8169	YWH62	09 Y	YARD/WORK	S	1	2	1
06/10/98	0031	8170	YWH62	09 Y	YARD/WORK	N	1	1	1
06/10/98	0359	8171	MFWNP	08 T	THROUGH	N	2	75	1
06/10/98	0635	8172	LVB55	10 L	ARK CTY LOC	S	2	32	1
06/10/98	0959	8173	YWH55	10 Y	YARD/WORK	S	1	7	1
06/10/98	1131	8174	YWH55	10 Y	YARD/WORK	N	1	11	1
06/10/98	1145	8175	LVB55	10 L	ARK CTY LOC	N	2	25	1
06/10/98	1448	8176	MHOKC	08 T	THROUGH	N	2	49	1
06/10/98	2005	8177	MWTFW	10 T	THROUGH	S	3	67	1
06/10/98	2249	8178	YWH62	10 Y	YARD/WORK	S	1	1	1
06/10/98	2319	8179	YWH62	10 Y	YARD/WORK	N	1	1	1
06/11/98	0016	8180	LVO54	10 L	THROUGH	N	2	94	1
06/11/98	0637	8181	LVB55	11 L	ARK CTY LOC	S	2	29	1
06/11/98	0946	8182	YWH55	11 Y	YARD/WORK	S	1	14	1
06/11/98	1102	8183	YWH55	11 Y	YARD/WORK	N	1	6	1
06/11/98	1117	8184	LVO55	11 L	THROUGH	S	1	19	1
06/11/98	1219	8185	LVB55	11 L	ARK CTY LOC	N	2	3	1
06/11/98	1529	8186	RCKWT	11 O	THROUGH	N	2	2	1
06/11/98	2110	8187	RWICK	11 O	THROUGH	S	2	0	1
06/11/98	2159	8188	YWH62	11 Y	YARD/WORK	S	1	0	1
06/11/98	2243	8189	YWH62	11 Y	YARD/WORK	N	1	6	1
06/12/98	0206	8190	MFWWT	09 T	THROUGH	N	4	134	2
06/12/98	0239	8191	MFWWT	10 T	THROUGH	N	3	71	1
06/12/98	0635	8192	MWTFW	11 T	THROUGH	S	2	21	1
06/12/98	0639	8193	LVB55	12 L	ARK CTY LOC	S	2	10	1
06/12/98	1013	8194	LVB55	12 L	ARK CTY LOC	N	2	36	1
06/12/98	1355	8195	WJCCSB	08 B	YARD/WORK	S	1	12	1

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TRANSPORTATION RESEARCH  
 AEI SCANNER TRAIN HISTORY DETAIL REPORT FOR SCANNER #359-SOUTH WICHITA  
 FOR PERIOD 06/01/98-06/30/98

DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R	LOCO UNITS	CARS	NUM TRNS
06/12/98	1829	8196	GECYEI 09	G	THROUGH	S	4	101	1
06/12/98	1947	8197	MWTFW 12	T	THROUGH	S	3	86	1
06/12/98	2204	8198	YWH62 12	Y	YARD/WORK	S	1	0	1
06/12/98	2248	8199	YWH62 12	Y	YARD/WORK	N	1	5	1
06/13/98	0115	8200	MFWWP 11	T	THROUGH	N	3	109	1
06/13/98	0641	8201	LVB55 13	L	ARK CTY LOC	S	2	50	1
06/13/98	0903	8202	GSOLGV 10	G	THROUGH	S	4	100	1
06/13/98	0929	8203	YWH55 13	Y	YARD/WORK	S	1	2	1
06/13/98	1013	8204	YWH55 13	Y	YARD/WORK	N	1	3	1
06/13/98	1259	8205	LVB55 13	L	ARK CTY LOC	N	2	26	1
06/13/98	1646	8206	MWTFW 13	T	THROUGH	S	2	49	1
06/13/98	2224	8207	YWH62 13	Y	YARD/WORK	S	1	13	1
06/13/98	2249	8208	YWH62 13	Y	YARD/WORK	N	1	4	1
06/13/98	2341	8209	MFWWT 12	T	THROUGH	N	3	83	1
06/14/98	0339	8210	MFWWT 11	T	THROUGH	N	1	30	1
06/14/98	1734	8211	MWTFW 14	T	THROUGH	S	2	38	1
06/14/98	2123	8212	YWH60 14	Y	YARD/WORK	S	1	0	1
06/14/98	2159	8213	YWH60 14	Y	YARD/WORK	N	1	7	1
06/15/98	0056	8214	MFWWT 08	T	THROUGH	N	3	82	1
06/15/98	0654	8215	LVB55 15	L	ARK CTY LOC	S	2	26	1
06/15/98	1157	8216	MFWWT 13	T	THROUGH	N	5	43	1
06/15/98	1837	8217	MWTFW 15	T	THROUGH	S	6	49	1
06/15/98	2240	8218	YWH62 15	Y	YARD/WORK	S	1	0	1
06/15/98	2313	8219	YWH62 15	Y	YARD/WORK	N	1	5	1
06/16/98	0059	8220	LVO54 15	L	THROUGH	N	1	7	1
06/16/98	0639	8221	LVB55 16	L	ARK CTY LOC	S	2	29	1
06/16/98	0913	8222	YWH55 16	Y	YARD/WORK	S	1	0	1
06/16/98	1020	8223	LVB55 16	L	ARK CTY LOC	N	2	33	1
06/16/98	1059	8224	YWH55 16	Y	YARD/WORK	N	1	10	1
06/16/98	1123	8225	LVO55 16	L	THROUGH	S	1	17	1
06/16/98	1409	8226	MHOKC 12	T	THROUGH	N	3	100	1
06/16/98	1538	8227	RCKWT 16	O	THROUGH	N	2	2	1
06/16/98	1759	8228	MWTFW 16	T	THROUGH	S	3	19	1
06/16/98	2025	8229	RWICK 16	O	THROUGH	S	2	0	1
06/16/98	2120	8230	MFWWT 15	T	THROUGH	N	2	48	1
06/16/98	2259	8231	YWH62 16	Y	YARD/WORK	S	1	5	1

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 FOR PERIOD 06/01/98-06/30/98

DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R	LOCO UNITS	CARS	NUM TRNS
06/16/98	2344	8232	YWH62 16	Y	YARD/WORK	N	1	2	1
06/17/98	0636	8233	LVB55 17	L	ARK CTY LOC	S	2	14	1
06/17/98	1017	8234	YWH55 17	Y	YARD/WORK	S	1	13	1
06/17/98	1055	8235	YWH55 17	Y	YARD/WORK	N	1	7	1
06/17/98	1104	8236	LVB55 17	L	ARK CTY LOC	N	2	38	1
06/17/98	1817	8237	MWTFW 17	T	THROUGH	S	7	76	1
06/17/98	2032	8238	MFWWT 16	T	THROUGH	N	3	46	1
06/17/98	2124	8239	GSHOWA 14	G	THROUGH	N	4	107	1
06/17/98	2238	8240	YWH62 17	Y	YARD/WORK	S	1	2	1
06/17/98	2307	8241	YWH62 17	Y	YARD/WORK	N	1	1	1
06/17/98	2331	8242	LVO54 17	L	THROUGH	N	2	9	1
06/18/98	0334	8243	GLBYHO 12	G	THROUGH	S	4	96	1
06/18/98	0650	8244	LVB55 18	L	ARK CTY LOC	S	2	21	1
06/18/98	1044	8245	YWH55 18	Y	YARD/WORK	S	1	5	1
06/18/98	1114	8246	YWH55 18	Y	YARD/WORK	N	1	5	1
06/18/98	1202	8247	LVB55 18	L	ARK CTY LOC	N	2	11	1
06/18/98	1219	8248	LVO55 18	L	THROUGH	S	2	7	1
06/18/98	1457	8249	RCKWT 18	O	THROUGH	N	1	1	1
06/18/98	1637	8250	MWTFW 18	T	THROUGH	S	2	23	1
06/18/98	2057	8251	RWICK 18	O	THROUGH	S	2	0	1
06/19/98	0214	8252	MFWWT 17	T	THROUGH	N	2	55	1
06/19/98	0636	8253	LVB55 19	L	ARK CTY LOC	S	2	24	1
06/19/98	1009	8254	LVB55 19	L	ARK CTY LOC	N	2	24	1
06/19/98	1030	8255	YWH55 19	Y	YARD/WORK	S	1	6	1
06/19/98	1130	8256	YWH55 19	Y	YARD/WORK	N	1	6	1
06/19/98	1638	8257	MWTFW 19	T	THROUGH	S	3	60	1
06/19/98	2204	8258	YWH62 19	Y	YARD/WORK	S	1	0	1
06/19/98	2301	8259	YWH62 19	Y	YARD/WORK	N	1	4	1
06/19/98	2327	8260	LVO54 19	L	THROUGH	N	3	21	1
06/20/98	0636	8261	LVB55 20	L	ARK CTY LOC	S	2	22	1
06/20/98	0722	8262	MFWWT 18	T	THROUGH	N	2	106	1
06/20/98	1006	8263	YWH55 20	Y	YARD/WORK	S	1	5	1
06/20/98	1040	8264	YWH55 20	Y	YARD/WORK	N	1	5	1
06/20/98	1107	8265	LVO55 20	L	THROUGH	S	3	10	1
06/20/98	1302	8266	LVB55 20	L	ARK CTY LOC	N	2	28	1
06/20/98	1518	8267	YWH55 20	Y	YARD/WORK	S	1	6	1

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DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R	LOCO UNITS	CARS	NUM TRNS
06/20/98	1656	8268	YWH55	20 Y	YARD/WORK	N	1	2	1
06/20/98	1843	8269	MWTFW	20 T	THROUGH	S	5	45	1
06/20/98	2235	8270	MFWWT	19 T	THROUGH	N	2	65	1
06/20/98	2253	8271	YWH62	20 Y	YARD/WORK	S	1	7	1
06/20/98	2323	8272	YWH62	20 Y	YARD/WORK	N	1	4	1
06/21/98	0524	8273	GSGVOL	17 G	THROUGH	N	2	100	1
06/21/98	1016	8274	YWH55	21 Y	YARD/WORK	S	1	0	1
06/21/98	1109	8275	YWH55	21 Y	YARD/WORK	N	1	8	1
06/21/98	1421	8276	YWH55	21 Y	YARD/WORK	S	1	1	1
06/21/98	1636	8277	YWH55	21 Y	YARD/WORK	N	1	2	1
06/21/98	2155	8278	YWH60	21 Y	YARD/WORK	S	1	13	1
06/21/98	2226	8279	YWH60	21 Y	YARD/WORK	N	1	5	1
06/22/98	0011	8280	MFWWT	20 T	THROUGH	N	5	48	1
06/22/98	0642	8281	LVB55	22 L	ARK CTY LOC	S	2	45	1
06/22/98	1048	8282	YWH55	22 Y	YARD/WORK	S	1	4	1
06/22/98	1157	8283	YWH55	22 Y	YARD/WORK	N	1	4	1
06/22/98	1204	8284	LVB55	22 L	ARK CTY LOC	N	2	2	1
06/22/98	2130	8285	YWH62	22 Y	YARD/WORK	S	1	7	1
06/22/98	2157	8286	MWTFW	22 T	THROUGH	S	4	103	1
06/22/98	2223	8287	YWH62	22 Y	YARD/WORK	N	1	5	1
06/23/98	0014	8288	MFWWT	21 T	THROUGH	N	2	57	1
06/23/98	0104	8289	LVO54	22 L	THROUGH	N	1	30	1
06/23/98	0635	8290	LVB55	23 L	ARK CTY LOC	S	2	18	1
06/23/98	1036	8291	YWH55	23 Y	YARD/WORK	S	1	5	1
06/23/98	1111	8292	YWH55	23 Y	YARD/WORK	N	1	5	1
06/23/98	1124	8293	LVO55	23 L	THROUGH	S	1	19	1
06/23/98	1312	8294	LVB55	23 L	ARK CTY LOC	N	2	62	1
06/23/98	1525	8295	RCKWT	23 O	THROUGH	N	2	2	1
06/23/98	1539	8296	MWTFW	23 T	THROUGH	S	3	39	1
06/23/98	2146	8297	RWICK	23 O	THROUGH	S	2	0	1
06/23/98	2331	8298	YWH62	23 Y	YARD/WORK	S	1	11	1
06/24/98	0107	8299	YWH62	23 Y	YARD/WORK	N	1	7	1
06/24/98	0308	8300	GSHOCW	21 G	THROUGH	N	4	100	1
06/24/98	0637	8301	LVB55	24 L	ARK CTY LOC	S	2	25	1
06/24/98	0917	8302	GSWAHO	20 G	THROUGH	S	4	99	1
06/24/98	1056	8303	YWH55	24 Y	YARD/WORK	S	1	7	1

WICHITA-ARKANSAS CITY LOCALS OPERATE VIA ATSF TRACKAGE RIGHTS AND WERE  
 NOT INCLUDED IN THE 4.4 BASE TRAINS/DAY BETWEEN WICHITA AND CHICKASHA.



PROGRAM: FPAN127.FOCUS.EXEC(AEIHIST-WHLA-2)  
 DATE RUN: 07/01/98 20.15.59

TRANSPORTATION RESEARCH  
 AEI SCANNER TRAIN HISTORY DETAIL REPORT FOR SCANNER #359-SOUTH WICHITA  
 FOR PERIOD 06/01/98-06/30/98

DATE	TIME	SEQ NUM	TRAIN	TRN CAT	TRAIN TYPE	D I R	LOCS UNITS	CARS	NUM TRNS
06/24/98	1145	8304	YWH55	24 Y	YARD/WORK	N	1	8	1
06/24/98	1218	8305	LVB55	24 L	ARK CTY LOC	N	2	47	1
06/24/98	1407	8306	YWH55	24 Y	YARD/WORK	S	1	5	1
06/24/98	1630	8307	YWH55	24 Y	YARD/WORK	N	1	1	1
06/24/98	1811	8308	MWTFW	24 T	THROUGH	S	2	73	1
06/24/98	2302	8309	YWH62	24 Y	YARD/WORK	S	1	2	1
06/25/98	0000	8310	YWH62	24 Y	YARD/WORK	N	1	4	1
06/25/98	0639	8311	LVB55	25 L	ARK CTY LOC	S	2	17	1
06/25/98	0943	8312	LVB55	25 L	ARK CTY LOC	N	2	5	1
06/25/98	1046	8313	YWH55	25 Y	YARD/WORK	S	1	5	1
06/25/98	1111	8314	YWH55	25 Y	YARD/WORK	N	1	4	1
06/25/98	1255	8315	MFWWT	22 T	THROUGH	N	2	100	1
06/25/98	1549	8316	RCHWT	25 O	THROUGH	N	2	0	1
06/25/98	1741	8317	MFWWT	24 T	THROUGH	N	3	89	1
06/25/98	1848	8318	MWTFW	25 T	THROUGH	S	3	18	1
06/25/98	1906	8319	GEGVER	11 G	THROUGH	N	2	107	1
06/25/98	2237	8320	YWH62	25 Y	YARD/WORK	S	1	3	1
06/25/98	2329	8321	YWH62	25 Y	YARD/WORK	N	1	7	1
06/26/98	0154	8322	RWTCK	25 O	THROUGH	S	2	0	1
06/26/98	0636	8323	LVB55	26 L	ARK CTY LOC	S	2	33	1
06/26/98	0956	8324	YWH55	26 Y	YARD/WORK	S	1	3	1
06/26/98	1117	8325	YWH55	26 Y	YARD/WORK	N	1	6	1
06/26/98	1220	8326	LVB55	26 L	ARK CTY LOC	N	2	8	1
06/26/98	1325	8327	YWH55	26 Y	YARD/WORK	S	1	4	1
06/26/98	1524	8328	YWH55	26 Y	YARD/WORK	N	1	2	1
06/26/98	1554	8329	MWTFW	26 T	THROUGH	S	2	49	1
06/26/98	2256	8330	YWH62	26 Y	YARD/WORK	S	1	10	1
06/26/98	2302	8331	MFWWT	25 T	THROUGH	N	2	107	1
06/26/98	2328	8332	YWH62	26 Y	YARD/WORK	N	1	4	1
06/27/98	0635	8333	LVB55	27 L	ARK CTY LOC	S	2	13	1
06/27/98	0911	8334	LVO54	26 L	THROUGH	N	3	74	1
06/27/98	0929	8335	GSHUHO	22 G	THROUGH	S	5	88	1
06/27/98	1025	8336	YWH55	27 Y	YARD/WORK	S	1	4	1
06/27/98	1116	8337	YWH55	27 Y	YARD/WORK	N	1	6	1
06/27/98	1319	8338	LVB55	27 L	ARK CTY LOC	N	2	30	1
06/27/98	1358	8339	LVO55	27 L	THROUGH	S	3	27	1

WICHITA-ARKANSAS CITY LOCALS OPERATE VIA ATSF TRACKAGE RIGHTS AND WERE  
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PROGRAM: FPAN127.FOCUS.EXEC(AETIHST-WHTA-2)

DATE RUN: 07/01/98 20.15.59

TRANSPORTATION RESEARCH  
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 FOR PERIOD 06/01/98-06/30/98

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06/27/98	1949	8340	MWTFW	27	T	THROUGH	S	2	49	1
06/27/98	2229	8341	YWH62	27	Y	YARD/WORK	S	1	0	1
06/27/98	2248	8342	YWH62	27	Y	YARD/WORK	N	1	4	1
06/27/98	2350	8343	GSHOWA	22	G	THROUGH	N	4	105	1
06/28/98	0903	8344	YWH55	28	Y	YARD/WORK	S	1	5	1
06/28/98	0939	8345	YWH55	28	Y	YARD/WORK	N	1	0	1
06/28/98	1629	8346	MFWWT	26	T	THROUGH	N	2	78	1
06/28/98	1816	8347	GSOLGV	24	G	THROUGH	S	4	98	1
06/28/98	2201	8348	YWH55	28	Y	YARD/WORK	S	1	9	1
06/28/98	2220	8349	YWH55	28	Y	YARD/WORK	N	1	5	1
06/28/98	2238	8350	MFWWTX	27	T	THROUGH	N	2	71	1
06/28/98	2344	8351	MFWWT	27	T	THROUGH	N	2	28	1
06/29/98	0209	8352	MWTFW	28	T	THROUGH	S	3	106	1
06/29/98	0641	8353	LVB55	29	L	ARK CTY LOC	S	2	37	1
06/29/98	0949	8354	GEHOSR	26	G	THROUGH	N	2	101	1
06/29/98	1037	8355	YWH55	29	Y	YARD/WORK	S	1	10	1
06/29/98	1141	8356	YWH55	29	Y	YARD/WORK	N	1	8	1
06/29/98	1142	8357	LVB55	29	L	ARK CTY LOC	N	2	2	1
06/29/98	2021	8358	GSHOWA	26	G	THROUGH	N	4	103	1
06/29/98	2324	8359	LVO54	29	L	THROUGH	N	1	14	1
06/30/98	0637	8360	LVB55	30	L	ARK CTY LOC	S	2	42	1
06/30/98	1012	8361	YWH55	30	Y	YARD/WORK	S	1	5	1
06/30/98	1058	8362	YWH55	30	Y	YARD/WORK	N	1	7	1
06/30/98	1212	8363	LVO55	30	L	THROUGH	S	1	17	1
06/30/98	1227	8364	LVB55	30	L	ARK CTY LOC	N	2	42	1
06/30/98	1600	8365	RCKWT	30	O	THROUGH	N	2	2	1
06/30/98	1631	8366	MWTFW	30	T	THROUGH	S	4	49	1
06/30/98	2044	8367	MFWWT	29	T	THROUGH	N	3	94	1
06/30/98	2113	8368	FWICK	30	O	THROUGH	S	2	0	1
06/30/98	2327	8369	YWH62	30	Y	YARD/WORK	S	1	5	1

\*TOTAL YEAR 98

518 8,097 283

\*\* AVG\_THRU\_TRN 3.97

AVG\_TOT\_TRN 9.43

TOTAL

518 8,097 283

WICHITA-ARKANSAS CITY LOCALS OPERATE VIA ATSF TRACKAGE RIGHTS AND WERE  
 NOT INCLUDED IN THE 4.4 BASE TRAINS/DAY BETWEEN WICHITA AND CHICKASHA.

STB

FD-32700

12-8-97

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ID-184630

**CONTINENTAL GRAIN COMPANY**

*North American Grain Division*  
222 South Riverside Plaza - Suite 1100  
Chicago, Illinois 60606

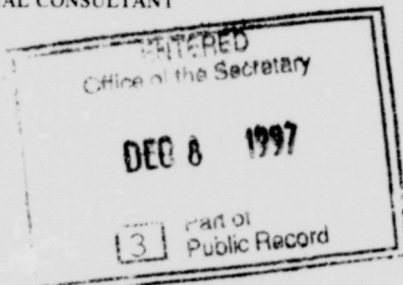
(312) 207 3822

(312) 280 0184

Fax: (312) 280-8378

184630

Rodman Kober  
DIVISIONAL CONSULTANT



December 5, 1997



Vernon A. Williams, Secretary  
Surface Transportation Board  
1925 K Street, NW  
Washington, DC 20423-0001

Re: *Supporting Statement in Finance Docket No. 32760*

Dear Secretary:

Enclosed are an original and twenty-five copies of Continental Grain Company's Supporting Statement to complement BNSF's Petition for Clarification in this proceeding.

Sincerely,

Rodman Kober, Counsel for  
Continental Grain Company

cc: All Parties of Record



BEFORE THE  
SURFACE TRANSPORTATION BOARD

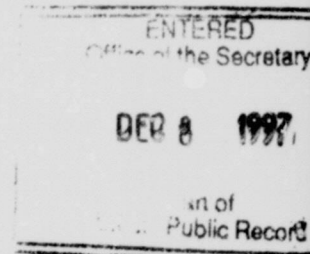
Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL AND MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY  
COMPANY, SPCSL CORP., AND THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY

VERIFIED STATEMENT OF RODMAN KOBER  
IN BEHALF OF CONTINENTAL GRAIN COMPANY



I am Rodman Kober, former Vice President-Transportation of Continental Grain Company ("Continental") and its commerce counsel in this proceeding, whose address is 222 South Riverside Plaza, Suite 1100, Chicago, IL 60606. I was responsible for over twenty years for the management of rail operations and policies for Continental's export terminal at Westwego, LA. I am authorized to make this statement for Continental.

Continental hereby supports the Burlington Northern and Santa Fe Railway Company's ("BNSF") attempt to assert its right to serve Continental's Westwego grain terminal directly through reciprocal switching with UP. Continental hereby seeks to restore a competitive opportunity that existed before the merger of the Union Pacific Railroad Company ("UP") and the Southern Pacific Transportation Company ("SP"). Reestablishing this competitive option through direct access is a major element in the merger settlement agreement between UP and BNSF and in the conditions imposed by this Board (collectively, the "Merger Settlement Conditions").

The Westwego export terminal receives bulk shipments of corn, soybeans, wheat, and milo by rail and barge for transloading into ocean vessels. Average annual volume has been 10,275,000 tonnes, which has included an average of 8,100 rail carloads annually. Although Center Gulf grain terminals receive most grain by barge, rail receipts have become a more important element of these export terminals' inbound traffic.

Barge rates vary dynamically; and thus, when river freight rises in response to increased shipper demand, rail rates can quickly become the dominant transportation price if rail supplies are available. This modal relationship is ever changing; and thus, the availability of rail rates from large areas of production is very important to Continental's seizing competitive rail opportunities when they occur. Secondly, the use of rail service, when competitive, provides an opportunity to improve operational efficiency by balancing heavy barge receipts with rail tonnage that can be unloaded simultaneously with the unloading of barges.

Before and after execution of the Merger Settlement Conditions, SP had access to Continental's Westwego terminal, in conjunction with a reciprocal switching charge published by UP,<sup>1</sup> both of which tariff references were subject to Circle Reference 74:

Applies on Grain, Grain Products, Seeds, and related articles as described in Tariff ICC WTL 6330-series.

This switching charge applied between New Orleans, LA and Westwego, and there were no carrier or commodity exceptions or exclusions. Thus, this tariff provided, both before and after the declaration of the Merger Settlement Conditions, that SP could interchange grain carloads with UP at New Orleans for delivery to Continental's Westwego grain terminal through UP reciprocal switching.

The Merger Settlement Conditions provide that a shipper with pre-merger competitive service by both SP and UP would have a similar competitive opportunity or service from BNSF as the replacement carrier -- the so-called two-for-one rule. Continental did not receive any grain from SP origins before the UP/SP merger, for SP had too little grain on its lines to induce it to offer a competitive alternative to its Texas Gulf export terminals. This lack of SP traffic, however, does not negate the fact that Westwego was, and should be considered, a two-for-one point under the Merger Settlement Conditions.

It should be noted in this regard that UP also did not provide competitive grain rates and service to Westwego, although Westwego is a local point on UP.<sup>2</sup> Thus, both before and after the UP/SP merger, UP acted solely as a switching carrier to deliver other railroads' grain shipments to Westwego.

UP's provision of competitive rates to Westwego was published only after UP was authorized to exercise full control of the Chicago and North Western Railway ("CNW"). Thereafter, UP provided grain rates and service to Westwego from former CNW origins. **Whether a beneficiary or not of SP and UP's grain shipments before the merger, however, Westwego is a two-for-one point.**

Continental infers from changes in UP's reciprocal switching charges between New Orleans and Westwego that UP recognized belatedly that Westwego was and is a two-for-one point under the Merger Settlement Conditions, a fact that UP wanted to avoid.<sup>3</sup> For the first time, **after execution of the Merger Settlement Conditions**, UP restricted the application of its Westwego reciprocal switching charge for grain. Although SP is designated in the revised item, the merger of UP and SP had been approved before the effective date of Supplement 194. UP also provided a higher switching charge therein for general commodities (Circle Reference 258), but that higher rate is also limited to

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<sup>1</sup> Supplement 164 to Missouri Pacific Railroad's Switching Tariff 8170-C, Item 3000-F, effective April 23, 1995, and Supplement 180 to Missouri Pacific Railroad's Switching Tariff 8170-C, effective November 7, 1995.

<sup>2</sup> There were very rare occasions when grain was shipped from UP origins to Westwego, despite the generally uncompetitive rates for that service. In each instance, some contractual or operational emergency compelled those decisions regardless of cost.

<sup>3</sup> Supplement 194 to Missouri Pacific Railroad's Switching Tariff 8170-C, Item 3000-H, effective September 14, 1996.

specific railroads. Neither switching charge, subject to Circle References 74 nor 258, applies in connection with BNSF. Thus, UP has labored to defeat BNSF's right to provide direct service to Continental's Westwego grain terminal although Westwego is a two-for-one point that should be covered by the Merger Settlement Conditions.

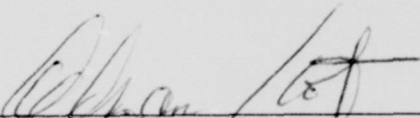
SP's limited grain volume presented no threat to UP. BNSF, however, covers a vast grain production territory where it originates more grain than any other US railroad. BNSF's competitive presence at Westwego, therefore, could create a very important rail alternative for Continental -- and UP -- when delivered pricing of BNSF grain is competitive with other rail, including UP, and barge options.

Simply put, BNSF is the largest rail originator of grain in the nation. Thus, BNSF's presence as a competitive factor at Westwego -- through direct access by reciprocal switching -- would be a major enhancement of competition for rail grain receipts and for Continental's procurement of rail grain for its Westwego terminal.

### VERIFICATION

I, Rodman Kober, hereby affirm and state that I have read the foregoing statement, that I am personally familiar with its contents, that I have executed it with full authority to do so, and that the facts set forth therein are true and correct to the best of my knowledge, information, and belief.

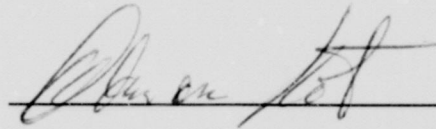
Executed by the undersigned on this 5th day of December, 1997.

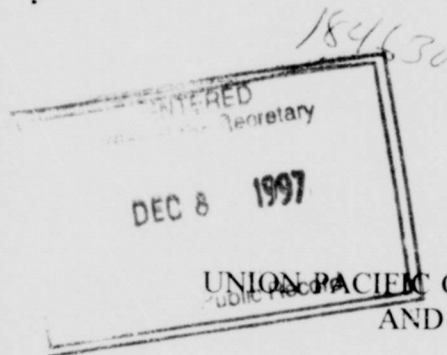
  
\_\_\_\_\_  
Rodman Kober



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Supporting Statement, complementing BNSF's Petition for Clarification in Finance Docket No. 32760, is being served by first-class mail or by a more expeditious means of delivery on all Parties of Record in said proceeding.





BEFORE THE  
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760



UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL AND MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY  
COMPANY, SPCSL CORP., AND THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY

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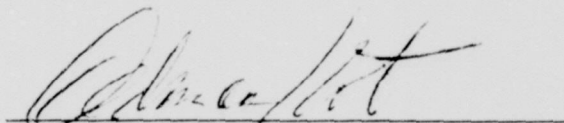
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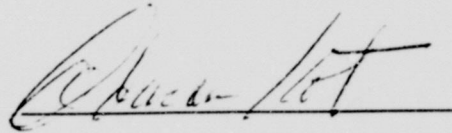
Executed by the undersigned on this 5th day of December, 1997.

  
Rodman Kober

. . . . .

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Supporting Statement, complementing BNSF's Petition for Clarification in Finance Docket No. 32760, is being served by first-class mail or by a more expeditious means of delivery on all Parties of Record in said proceeding.



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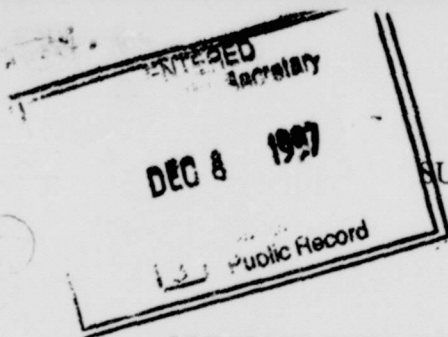
32760

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184630





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BEFORE THE  
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL AND MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY  
COMPANY, SPCSL CORP., AND THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY

VERIFIED STATEMENT OF RODMAN KOBER  
IN BEHALF OF CONTINENTAL GRAIN COMPANY

D

I am Rodman Kober, former Vice President-Transportation of Continental Grain Company ("Continental") and its commerce counsel in this proceeding, whose address is 222 South Riverside Plaza, Suite 1100, Chicago, IL 60606. I was responsible for over twenty years for the management of rail operations and policies for Continental's export terminal at Westwego, LA. I am authorized to make this statement for Continental.

Continental hereby supports the Burlington Northern and Santa Fe Railway Company's ("BNSF") attempt to assert its right to serve Continental's Westwego grain terminal directly through reciprocal switching with UP. Continental's hereby seeks to restore a competitive opportunity that existed before the merger of the Union Pacific Railroad Company ("UP") and the Southern Pacific Transportation Company ("SP"). Reestablishing this competitive option through direct access is a major element in the merger settlement agreement between UP and BNSF and in the conditions imposed by this Board (collectively, the "Merger Settlement Conditions").

The Westwego export terminal receives bulk shipments of corn, soybeans, wheat, and milo by rail and barge for transloading into ocean vessels. Average annual volume has been 10,275,000 tonnes, which has included an average of 8,100 rail carloads annually. Although Center Gulf grain terminals receive most grain by barge, rail receipts have become a more important element of these export terminals' inbound traffic.

Barge rates vary dynamically; and thus, when river freight rises in response to increased shipper demand, rail rates can quickly become the dominant transportation price if rail supplies are available. This modal relationship is ever changing; and thus, the availability of rail rates from large areas of production is very important to Continental's seizing competitive rail opportunities when they occur. Secondly, the use of rail service, when competitive, provides an opportunity to improve operational efficiency by balancing heavy barge receipts with rail tonnage that can be unloaded simultaneously with the unloading of barges.

Before and after execution of the Merger Settlement Conditions, SP had access to Continental's Westwego terminal, in conjunction with a reciprocal switching charge published by UP,<sup>1</sup> both of which tariff references were subject to Circle Reference 74:

Applies on Grain, Grain Products, Seeds, and related articles as described in Tariff ICC WTL 6330-series.

This switching charge applied between New Orleans, LA and Westwego, and there were no carrier or commodity exceptions or exclusions. Thus, this tariff provided, both before and after the declaration of the Merger Settlement Conditions, that SP could interchange grain carloads with UP at New Orleans for delivery to Continental's Westwego grain terminal through UP reciprocal switching.

The Merger Settlement Conditions provide that a shipper with pre-merger competitive service by both SP and UP would have a similar competitive opportunity or service from BNSF as the replacement carrier -- the so-called two-for-one rule. Continental did not receive any grain from SP origins before the UP/SP merger, for SP had too little grain on its lines to induce it to offer a competitive alternative to its Texas Gulf export terminals. This lack of SP traffic, however, does not negate the fact that Westwego was, and should be considered, a two-for-one point under the Merger Settlement Conditions.

It should be noted in this regard that UP also did not provide competitive grain rates and service to Westwego, although Westwego is a local point on UP.<sup>2</sup> Thus, both before and after the UP/SP merger, UP acted solely as a switching carrier to deliver other railroads' grain shipments to Westwego.

UP's provision of competitive rates to Westwego was published only after UP was authorized to exercise full control of the Chicago and North Western Railway ("CNW"). Thereafter, UP provided grain rates and service to Westwego from former CNW origins. **Whether a beneficiary or not of SP and UP's grain shipments before the merger, however, Westwego is a two-for-one point.**

Continental infers from changes in UP's reciprocal switching charges between New Orleans and Westwego that UP recognized belatedly that Westwego was and is a two-for-one point under the Merger Settlement Conditions, a fact that UP wanted to avoid.<sup>3</sup> For the first time, **after execution of the Merger Settlement Conditions**, UP restricted the application of its Westwego reciprocal switching charge for grain. Although SP is designated in the revised item, the merger of UP and SP had been approved before the effective date of Supplement 194. UP also provided a higher switching charge therein for general commodities (Circle Reference 258), but that higher rate is also limited to

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<sup>1</sup> Supplement 164 to Missouri Pacific Railroad's Switching Tariff 8170-C, Item 3000-F, effective April 23, 1995, and Supplement 180 to Missouri Pacific Railroad's Switching Tariff 8170-C, effective November 7, 1995.

<sup>2</sup> There were very rare occasions when grain was shipped from UP origins to Westwego, despite the generally uncompetitive rates for that service. In each instance, some contractual or operational emergency compelled those decisions regardless of cost.

<sup>3</sup> Supplement 194 to Missouri Pacific Railroad's Switching Tariff 8170-C, Item 3000-H, effective September 14, 1996.

specific railroads. Neither switching charge, subject to Circle References 74 nor 258, applies in connection with BNSF. Thus, UP has labored to defeat BNSF's right to provide direct service to Continental's Westwego grain terminal although Westwego is a two-for-one point that should be covered by the Merger Settlement Conditions.

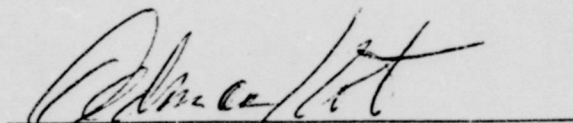
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Simply put, BNSF is the largest rail originator of grain in the nation. Thus, BNSF's presence as a competitive factor at Westwego -- through direct access by reciprocal switching -- would be a major enhancement of competition for rail grain receipts and for Continental's procurement of rail grain for its Westwego terminal.

### VERIFICATION

I, Rodman Kober, hereby affirm and state that I have read the foregoing statement, that I am personally familiar with its contents, that I have executed it with full authority to do so, and that the facts set forth therein are true and correct to the best of my knowledge, information, and belief.

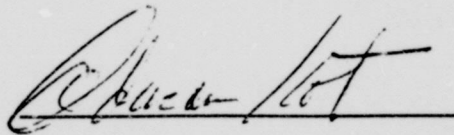
Executed by the undersigned on this 5th day of December, 1997.

  
Rodman Kober



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Supporting Statement, complementing BNSF's Petition for Clarification in Finance Docket No. 32760, is being served by first-class mail or by a more expeditious means of delivery on all Parties of Record in said proceeding.



STB

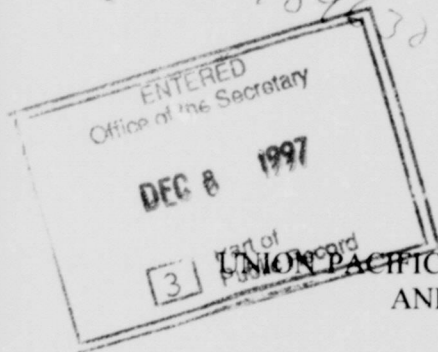
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BEFORE THE  
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760



UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL AND MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY  
COMPANY, SPCSL CORP., AND THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY

VERIFIED STATEMENT OF RODMAN KOBER  
IN BEHALF OF CONTINENTAL GRAIN COMPANY

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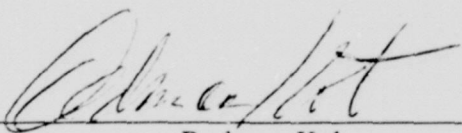
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### VERIFICATION

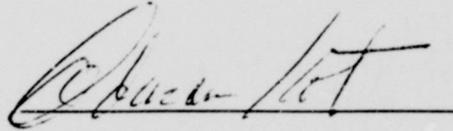
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Executed by the undersigned on this 5th day of December, 1997.

  
\_\_\_\_\_  
Rodman Kober

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Supporting Statement, complementing BNSF's Petition for Clarification in Finance Docket No. 32760, is being served by first-class mail or by a more expeditious means of delivery on all Parties of Record in said proceeding.





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Item No. \_\_\_\_\_

Page Count 12

18

Ad # 439

# RTATION CONSULTING, INC.

TA, KANSAS 67214

(316) 264-9630

April 26, 1996

**Vernon A. Williams**

**Secretary**

**Surface Transportation Board**

**12th & Constitution Avenue, N.W.**

**Washington, D.C. 20423**



**Re: Enid Board of Trade (EBT)**

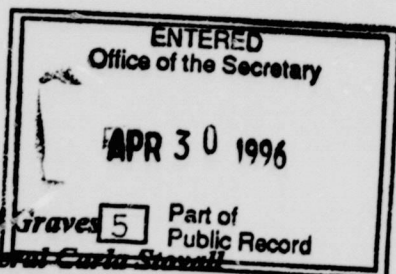
**Comments in Finance Docket No. 32760**

**Honorable Secretary Williams,**

*There is enclosed the comments of Enid Board of Trade (EBT), which is due on April 29, 1996. The original and 20 copies with a Word Perfect 5.1 floppy is being mailed by USA Postal Service Priority Mail system. A copy will be mailed first class to A.L.G. Nelson and all parties of record who have requested same.*

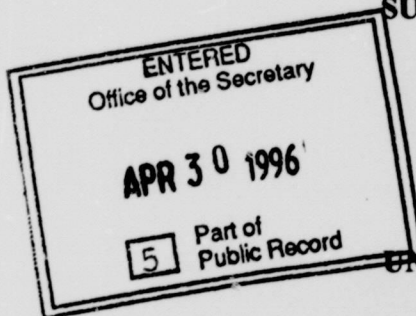
*Respectfully submitted,*

*James J. Inlandi*  
**James J. Inlandi**  
**S.T.B. Practitioner**



**c/c: Governor Bill Graves** 5 **Part of Public Record**  
**Attorney General Carla Starnell**

**JJI/sl**



BEFORE THE  
SURFACE TRANSPORTATION BOARD  
WASHINGTON, D.C. 20423

Finance Docket No. 32760



UNION PACIFIC CORPORATION, *et al.*,  
— CONTROL AND MERGER —  
SOUTHERN PACIFIC CORPORATION, *et al.*,

COMMENTS OF THE ENID BOARD OF TRADE  
IN SUPPORT OF THE KCS RAILWAY  
TO SERVE THE NORTH-SOUTH CORRIDOR  
IN THE STATES OF KANSAS-OKLAHOMA-TEXAS

Preface

Comes now the Enid Board of Trade (EBT) to support the KCS Railway in its efforts to replace the SP railroad in the states of Kansas, Oklahoma and Texas as a third Class I carrier in order to provide competition that is vitally needed in this mega carrier merger proceeding. EBT further states that Enid is presently served by the UP and BNSF railroads and that the service of these two railroads with rates and car supply is totally inadequate. This will be treated *infra*.

Two Main Issues

The two main issues included in these comments are:

1. **The North-South Corridor.**
2. **The KCS Railway needed to serve the states of Kansas, Oklahoma and Texas.**

Background Information

In our statement of opposition filed to meet the March 29, 1996, due date, EBT provided facts on the *deterioration* of the Enid market caused by management decisions of the applicants from 1984 to date. Now, we are confronted with additional decisions of both railroads which make it impossible to compete with the existing grain facilities due to switching arrangement and other aspects which may leave Enid and the state of Oklahoma in a noncompetitive posture when compared with other grain markets. This will be treated under Issue No. 2 as stated *supra*.



### **Issue No. 1: The North-South Corridor**

Enid qualifies as a two Class I railroad served market, namely, the BNSF and UP railroads. The United States Department of Justice, in its comments dated April 12, 1996, at page 8, at Summary of Evidence, stated:

***"The total volume of traffic in two-to-one markets is over \$1.5 billion. Dr. Majure also identifies hundreds of markets in which the number of competitors will decline from three to two following the merger. Again, these markets involve commodities such as intermodal traffic, agricultural products, wood products, iron and steel, and plastics moving in hundreds of traffic corridors throughout the West. The total volume of traffic in three-to-two markets is over \$4.75 billion."***

The BN-ATSF merger reduced Enid from the 3 to 2 railroad served market. The North-South Corridor (Kansas City, MO to Fort Worth, TX and beyond to the Gulf Ports) has, before the droughts of 1995 and possibly 1996, the best wheat and milo farmers in the United States. The production records are proof of this fact. Our statistical data in our comments at pages 5 and 6, filed last month, reveals this fact for Oklahoma. This is the reason for the applicants to forestall any other Class I carrier to serve this corridor so that it and the BNSF may divide up the business and determine which markets they will and will not serve and compete for business. The Governor of Kansas, Bill Graves, recognized this fact. His support is conditioned with the following:

***"My support for the merger is conditioned upon the resolution of three potential negative impacts on my state. These are concerns I share with several Kansas communities and shippers. I respectfully ask the Surface Transportation Board to study the following three issues and exercise its authority and responsibility to protect the best interest of Kansas citizens."***

***"Two of my concerns focus directly on reductions in competition:***

***\* A significant impact will occur along the line from Herington, Kansas to Pueblo, Colorado. According to the merger documents, this main line will be downgraded in Kansas and completely abandoned in Colorado. This will adversely affect communities and shippers in the heart of wheat country, where competitive rail service is critical. The Surface Transportation Board must ensure reliable and affordable rail transportation to the communities and shippers along this line.***

***\* The City of Wichita will also suffer a decrease in competition, from three major carriers to two. My staff has explored options to retain a third Class I railroad in Wichita and believes them to be possible and practical.***

*Please consider bringing a third Class I railroad into the Wichita market if the merger is approved.*

*"The third issue of concern involves the safety, quality of life, and economic well-being of Kansans. The increased traffic density on the 'Kansas City Bypass' will exacerbate historic problems with rail crossings in several Kansas communities. I would particularly direct your attention to the serious situation in Wichita, the state's largest population center. I realize you do not traditionally consider rail crossings in merger cases, but your analysis weighs the 'public interest', and public safety, quality and economic health are truly at stake. I would ask that you condition your approval of the merger upon a reasonable solution to these problems.*

*"I encourage you to ultimately approve the merger, while protecting the interests of Kansans. Union Pacific and Southern Pacific have been good corporate citizens in the State of Kansas, and I look forward to a continuing positive relationship with the merged corporation."*

This letter may be found in applicants' "Comments of Governors, Shippers and Others in Support of Primary Application" under the heading "Governors".

Congressman Todd Tiahrt represents the Fourth District of Kansas, which has the best wheat production in the state. He wrote the following letter to the Surface Transportation Board on March 29, 1996:

*"Dear Secretary Williams:*

*I recently wrote to you of my number one concern regarding the UP-SP merger. Namely, the impact of the merger on automobile commuting in the Wichita, Kansas metro area. (attached) Today, I would also like to mention the concern of Kansas shippers for true competition in the midst of the rail mergers. In addition, the Kansas shippers are concerned about the need for reciprocal switching.*

*Please analyze and then appropriately attend to the capacity of independent carriers to be competitive in the face of the carriers who would dominate the market subsequent a merger. I appreciate your attention to this matter and am hopeful that it will be resolved in a through, deliberative manner."*

As early as October 2, 1995, Senator Nancy Kassebaum wrote the Interstate Commerce Commission the following letter:

*"Dear Commissioners:*

*As you are well aware, the railroad industry has undergone major consolidation in the past year. Now, with the pending Union Pacific and Southern Pacific merger, major change is again facing shippers throughout the Midwest and West.*

*I am aware that negotiations are underway among railroads in an attempt to address the competitive concerns that may arise as a result of the proposed merger. I have heard from many Kansas shippers who are particularly concerned that trackage rights with reasonable rates be established to ensure true competition. The need for reciprocal switching is another area of concern that has been raised.*

*The recent merger of the Burlington Northern and Santa Fe has dramatically changed the landscape of the railroad industry. Therefore, as you examine the affect of the Union Pacific proposal upon other carriers and shippers, it is imperative that you place it within this larger context. We need to ensure that independent carriers are able to be competitive in the face of these giant carriers who will undoubtedly dominate the market.*

*It is my hope that a thoughtful analysis of these and other questions that have been raised will ensure shippers access to a competitive railroad industry. I appreciate your attention to this matter and am hopeful that it will be resolved in a thorough, deliberative manner."*

It is EBT's understanding that our Oklahoma elected officials may address the impact on Oklahoma in their comments, which are due on April 29, 1996. The Texas agricultural industry has also made known to your Board the need for additional competition in the North-South Corridor.

The USDA, in its comments filed with the STB, also recognized the need for additional competition in the North-South Corridor. In its comments, at pages 5 and 6, we find:

**"THE NEED FOR A THIRD CLASS I RAILROAD ALTERNATIVE"**

*"The absence of a feasible alternative transportation mode requires movement by rail for the tremendous volumes of wheat produced in the Plains States. This wheat must move long distances to reach domestic markets, coastal ports and Mexican Gateways for export. USDA believes a third Class I Railroad alternative in the important corridor between the Lower Plains States and the Gulf and Mexican wheat markets would enhance competition and provide a measure of assurance to grain and other agricultural shippers concerned over the dominance in this market by two giant rail systems. A third Class I Railroad operating in this corridor may be needed to satisfy the service concerns and provide a competitive balance for shippers in the Nation's main winter wheat region which includes Kansas, Oklahoma, and Texas.*

*"USDA also believes that gains in trade, expected as a result of the North American Free Trade Agreement, largely depend on maintaining competitive transportation options and gateway access into Mexico. A third Class*



**I Railroad serving strategic gateways to Mexico would be beneficial for American wheat and other agricultural shippers, as well as for the Nation."**

### **Issue No. 2: The KCS Railway Needed to Serve the States of Kansas, Oklahoma and Texas**

The Surface Transportation Board may inquire why it is important that the KCS Railway serve this important North-South Corridor. Why not another Class I carrier? In meetings held with KCS officials, the EBT remembered that when President Mike Haverly was at the helm of the ATSF Railroad, his administration was very friendly to the agricultural businesses who are located in the North-South Corridor. He demonstrated that he wished to serve the agricultural community as a whole, treating all shippers with dignity and respect. He is a fourth generation railroad man who understands that all shippers and receivers must exist with rail transportation as their important mode of conveyance. Enid's prosperity was during the years of 1984 through the early 1990's. The MKT followed the ATSF's footsteps in helping the agricultural industry, and both railroads helped Enid grow to the third largest market in the United States.

### **Today's Attitude of the BNSF and UP Railroads**

Our Board of Director, Lew Meiberger, has succinctly expressed the attitude of both railroads in his statement attached to the comments of Tri-State previously filed with your Board. At Johnston Grain's statement, pages 2, 3, and 4, he has expressed the problems of Oklahoma agricultural interests. There is stated at page 2:

***"Our service has greatly deteriorated since the BN/Santa Fe merger, and I am fearful of what may happen with the UP-SP merger. I believe it is imperative that we have competing railroads to keep our transportation costs in line, and to be able to bid top dollar to the producers for their products. Today, we can ship out of Enid to Houston via the UP or BN-Santa Fe. However, the BN-Santa Fe has given trackage rights to the Southern Pacific on the old Santa Fe north-south line in Oklahoma. If the UP and SP were to merge, I am sure the SP would quit using the old Santa Fe main north-south line, because it runs parallel to the UP's line. Therefore, we would have only the BN-UP carrier left to ship our product to the Houston gulf.***

***"Losing the Santa Fe as a competitive carrier, as mentioned before, has greatly reduced our flexibility and ability to ship our products to the west coast and the Texas gulf. The BN has told us since they merged with the Santa Fe, there would be no more five-car rates to the west coast. The mills on the west coast are small and can handle only from three to ten cars at their particular mill. We worked hard to cultivate this association, but it appears that the lack of rail competition is going to take it away from us."***

At page 3 there is stated:

*"The UP was granted 3,600 miles of trackage rights by the BN, and I, personally, think that was to get the UP to quit bidding on the Santa Fe, in fighting the BN-Santa Fe merger. I just recently learned that the UP-SP has granted the BN-SF 4,000 miles of trackage rights. This probably sounds well and good to those who are not engaged in a business which is so dependent on rail transportation.*

*"I am also concerned as to whether the UP and SP have different labor contracts as the BNSF have. It appears to me that the BN and the Santa Fe are running as two separated railroads under the same management because their two railroad union contracts differ so that they cannot be merged and be made efficient to compete. I certainly hope that the Surface Transportation Board will look into the labor agreements that the UP and the SP have, as I feel that should not even be considered for a merger unless they can operate under one labor contract.*

*"Regardless of the union problems mentioned above, I can speak from experience. I was told by the Santa Fe, prior to the BN-SF merger, that the merger would take care of all of our switching problems and rail transportation problems in Enid, Oklahoma. This fact was because the Santa Fe would be handling the grain division of the merged railroads, which is definitely not the case. I do not think there is more than one of possibly two Santa Fe employees still employed in the grain division of the BN-SF. The employees are still at those jobs because they are progressing with the BN's policy of stockholders come first and echo the sentiments of the BN's hierarchy."*

At page 4 there is found a stronger emphasis of the need for the KCS Railway. He stated:

*"Trackage rights are not the answer to granting competition to a carrier and do not solve the competitive problems of a merger or of this merger. For instance, a railroad operating pursuant to trackage rights often experiences delays and congestion. It is charged higher rates thus the tenant-railroad cannot compete with the owner-railroad. That is what this is all about -- having competition to keep the rates in line and to have the equipment to move products to market.*

*"Put the 7,600 miles of trackage rights that have been swapped between the BN-SF and the UP-SP, it appears to me that the BN-SF is not going to be too much interest in competing with the UP-SP for traffic, due to the tacit collusion between the two carriers. In fact, in looking at a rail map, it appears to me that if this merger were to go through, the BN-SF and the UP-SP would*

***have a duopoly on all the states west of the Mississippi River. I can almost assure you if that happens there certainly will not be any competition between the two rail lines on prices or equipment. In fact, many shippers will be harmed by this collusion if this were allowed to take place. I am sure the UP-SP has used leverage or cut deals with various shippers to attempt to win support for this merger."***

Johnston Grain is the largest independent grain firm who is domiciled in Oklahoma. What is the posture of the many cooperatives in the state of Oklahoma. Is it similar to the Kansas Coops who opposed the merger?

**- Oklahoma Coops' Posture in This Proceeding -**

The coops have to thank Farmland Industries for the excellent presentation on their behalf by Vice President Frederic E. Schrod. His statement may be found at WSC Ex. 4. Farmland has facilities at Enid. At pages 2 and 3 of this statement, there is reference to a need for a third carrier:

2. **"A viable third carrier will not be available to compete with two remaining mega carriers in the central and southern corridor."**
3. **"The loss of competition will not be significantly improved with the so-called competitive agreement' between the Burlington Northern Santa Fe (BNSF) and UP. This is because the host carrier will start out with an 18-19% cost advantage in the first year and will widen this advantage each year. This is a result of the RCAF-U (70%) and increases of 4+% each year over the average RCAF (A) experienced by all class 1 carriers, according to L.E. Peabody & Associates."**
4. **"The ability of the two mega carriers to increase rates will decrease the country's ability to participate in the global agriculture market and increase the cost of food production in this country. This increase will be at the expense of the American consumer and the American farmer, because the farmer collects only what the consumer will pay. If the consumer pays more because of higher railroad rates, the consumer loses. If the consumer will not pay more, but the rail rates rise, the farmer gets less."**



At Exhibit F.E.S.-B, there is found the 2 to 1 relationship and information on the Enid Plant:

<u>Origin City</u>	<u>Origin State</u>	<u>Origin BEA</u>	<u>Destination CITY</u>	<u>Destination STATE</u>	<u>Destination BEA</u>	<u>Competitive Effect</u> 2 RR's to 1 RR 3 RR's to 2 RR's
Enid	OK	Oklahoma City, OK	Coffeyville	KS	Springfield, MO	
Enid	OK	Oklahoma City, OK	Gothenburg	NE	Grand Island, NE	
Enid	OK	Oklahoma City, OK	Hillsboro	KS	Waco, TX	
Enid	OK	Oklahoma City, OK	Laredo	TX	San Antonio, TX	2 to 1
Enid	OK	Oklahoma City, OK	Omaha	NE	Omaha, NE	
Enid	OK	Oklahoma City, OK	Port Allen	LA	Baton Rouge, LA	
Enid	OK	Oklahoma City, OK	San Antonio	TX	San Antonio, TX	2 to 1
Enid	OK	Oklahoma City, OK	Stockton (other)	CA		

There is additional information on Oklahoma at page 2 of the respondent list:

<u>Respondent List</u>							<u>Database Location</u>	
<u>St</u>	<u>City</u>	<u>Cooperative Name</u>	<u>No. Rail</u>	<u># Of Facil.</u>	<u>Contact Name</u>	<u>Phone</u>	<u>Obs</u>	<u>Survey</u>
OK	Ames	Farmers Elev. Co.	X	1	Howard Deloplane	405-753-4212	21	18
	Frederick	Farmers Coop Grain & Cotton		1		405-335-2107	83	78
	Medford	Clyde Coop Assn.		1	Arlie Goforth	405-395-3341	76	71

In summation of Farmland's statement we find:

**"Finally, Farmland opposes a merging carrier pair (UP/SP) picking not only its own competitor (BNSF), but naming it's first choice of competition, Illinois Central (ICG), in the central corridor. Again, we reiterate, the selection of BNSF does nothing more than establish a rate floor for the host carrier with no real competition occurring.**

**"Due to the market power of the Union Pacific in its franchise area, many shippers have been intimidated from opposing or seeking competitive conditions in fear of reprisal by the UP. Farmland formally asks the Board to resolutely protect those shippers who will not be intimidated by establishing, as a condition of this merger, a forum where an injured shipper may simply and economically make its case and seek damages from the carrier. Even with a conditional approval of a merger where a proposed merger has been rejected or withdrawn, reprisals in the form of service, car supply or rates have been commonplace in past mergers. As an example, the loss of \$100 million by our members in the short period the UP has owned the CNW, due to terrible service by UP has not, to our knowledge, been considered by the UP as something for which it bears responsibility.**

**"We PRAY the Surface Transportation Board will condition the merger so that shippers have a voice in selecting the third competitor in each corridor from a long list of viable candidates such as Montana Rail Link/Kansas City Southern in the central corridor and Kansas City Southern/Conrail/Norfolk Southern in the southern corridor."**

**- UP-SP's Answer to the Problem in the North-South Corridor -**

As stated supra, the KCS Railway wishes to serve all shippers, large and small. Does the UP-SP desire to help the small shippers? The answer is **NO!** On April 16, 1996, the UP announced the following:

**"Union Pacific Railroad will issue a revision to UP 4050 Items 1580, 1581, and 1582.00, revising carload minimum tender sizes applicable to the Louisiana and Texas gulf. The 25 carload minimum tender application will be eliminated. Railroad and Shipper single car and 75 car rate levels (69-91 carloads) will remain the same. We have added 100 car Railroad and Shipper rate levels (92-100 carloads). This change more accurately reflects carload sizes most utilized for gulf shipments."**

**The EBT is not aware of any single car shipments to Gulf Ports!** Please note that the UP will add 92-100 cars rate level. No shipper in Enid may load 92-100 cars without a penalty which will cause Enid to become noncompetitive. In addition, the duopoly will continue because of the recent notification that, to appease the chemical manufacturers, it will give the BNSF additional trackage rights, **which will also be detrimental to the Tex Mex Railroad.** The April 19, 1996, issue of The Journal of Commerce contained an article by Chris Isidore entitled "UP Adds Concessions to Gain Support". The article stated:

1. **"UP will modify contracts with shippers in Texas and Louisiana so that at least 50% of the volume is open to the BNSF."**
2. **"It agreed to limit changes in BNSF's trackage rights fees and allow CMA to audit escalations and calculations."**
3. **"It would provide the following:**
  - a. **Overhead trackage rights over UP's lines between Houston and East St. Louis**
  - b. **Over SP's line between Fair Oaks, Arkansas and East St. Louis**
  - c. **Over UP's line between Fair Oaks Arkansas and Bald Knob, Arkansas"**

**Conclusion**

The duopoly continues for the agricultural industry. A survey of all the supporting shippers reveals a dearth of numbers from the states of Oklahoma, Kansas and Colorado. Farmland Industries,

one of UP-SP's biggest shippers will be left high and dry with this duopoly. Oklahoma Coops also own stock in Farmland Industries. It is apparent from both the UP-SP and BNSF railroads that they will carve up the business west of the Mississippi River.

The U.S. Department of Justice recognizes this potentially harmful and prejudiced action by the UP-SP railroad. Conrail also recognizes the deception of the UP-SP in its comments found in a recent article in The Journal of Commerce. Conrail's President and CEO took the UP and SP railroads to task for making incorrect statements. The following was in the April 18, 1996 issue:

*"I read with dismay the attack on Conrail — thinly disguised as a defense of the widely opposed Union Pacific-Southern Pacific railroad merger — by my colleague Bob Starzel of SP (April 12, Page 6A). Throughout this long case, both UP and SP have responded to every expression of opposition or concern with angry, personalized attacks rather than on the merits. One can only assume that had a meritorious response been available, SP and UP would have made it. Instead, they attack the good faith and bona fides of their opponents."*

Also, in part, was the following:

*"The Western Shippers Coalition says unequivocally that 'this is the most important railroad proceeding' in the history of regulated rail mergers and 'the greatest threat to competition'.*

*"Mr Starzel says a UP-SP deal to give Burlington Northern Santa Fe trackage rights fixes all this. But, again, the parties mentioned above, and many, many others, do not agree. The NIT League says the BNSF deal 'only creates the appearance' of competition. The plastics industry association calls it a 'fig leaf'. The Texas Railroad Commission says UP-SP and BNSF offer no 'hard evidence' that BNSF will fix the problem — only promises. Conrail's own sworn testimony shows that BNSF could not possibly replace the role played by an independent SP today.*

*"BNSF's deal will allow it to provide only slower service, involving multiple rail handlings, at much higher cost, and with no ability to control the quality or timeliness of its service since BNSF won't own the tracks, but only rent them — from UP! Recently, SP itself submitted hundreds of pages of sworn testimony that UP discriminates against SP in its own trackage rights deal with UP."*



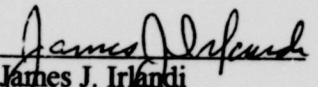
**Prayer for Relief**

EBT continues to pray that the STB authorizes the KCS Railway to serve the North-South Corridor as outlined supra. In an alternative measure in the final decision, deny the merger because there are other railroads who seek to purchase the SP and serve all shippers and receivers of the agricultural industry.

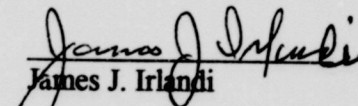
Respectfully Yours,

Joe N. Hampton  
General Manager  
Enid Board of Trade

By:

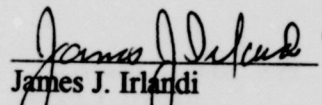
  
James J. Irlandi  
STB Practitioner

I, James J. Irlandi, verify under penalty of perjury that the foregoing is true and correct. Further, I certify that I am qualified to file this statement on behalf of the Enid Board of Trade.

  
James J. Irlandi

**CERTIFICATE OF SERVICE**

I certify that I have on this 26th day of April served the original and 20 copies of this Statement of Opposition upon the Surface Transportation Board with a WP5.1 floppy copy, also mailed to Honorable Jerome Nelson and parties of record who have requested same by first class mail, postage pre-paid in accordance with the Board's Rules of Practice.

  
James J. Irlandi

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Item No. \_\_\_\_\_

Page Count 7

APR #290

Y, WOOD & MASER, P.C.

Office of the Secretary

ATTORNEYS AND COUNSELORS AT LAW

SUITE 750

1100 NEW YORK AVENUE, N.W.

WASHINGTON, D.C. 20005-3934

TELECOPIER: (202) 371-0900

OFFICE: (202) 371-9300

☐ Part of  
Public Record

April 15, 1996

Honorable Vernon A. Williams  
Secretary  
Surface Transportation Board  
12th and Constitution Avenue, NW  
Washington, D.C. 20423

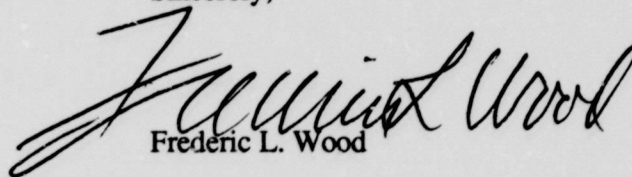
Re: Finance Docket No. 32760; *Union Pacific Corporation, et al. -- Control and Merger -- Southern Pacific Rail Corporation, et al.*

Dear Mr. Williams:

Enclosed for filing in the above-captioned proceeding are an original and twenty (20) copies of THE NATIONAL INDUSTRIAL TRANSPORTATION LEAGUE'S OBJECTIONS AND RESPONSES TO APPLICANTS' SIXTH SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS, designated NITL-15. Also enclosed is a diskette formatted in WordPerfect 5.1 with a copy of the Interrogatories.

If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Frederic L. Wood

ENCLOSURES  
0124-480

cc: Restricted Service List





<b>BEFORE THE</b>	
<b>SURFACE TRANSPORTATION BOARD</b>	
ENTERED Office of the Secretary	
<b>APR 19 1996</b>	Finance Docket No. 32760
<b>3</b> Part of Public Record	



**UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY**

**— CONTROL AND MERGER —**

**SOUTHERN PACIFIC RAIL CORPORATION,  
SOUTHERN PACIFIC TRANSPORTATION COMPANY, ST. LOUIS  
SOUTHWESTERN RAILWAY COMPANY, SPCSL CORP. AND THE  
DENVER AND RIO GRANDE WESTERN RAILROAD COMPANY**

**THE NATIONAL INDUSTRIAL TRANSPORTATION LEAGUE'S  
OBJECTIONS AND RESPONSES TO  
SIXTH SET OF INTERROGATORY  
REQUESTS FOR PRODUCTION OF**

**ORIGINAL**

**Nicholas J. DiMichael  
Frederic L. Wood  
DONELAN, CLEARY, WOOD &  
MASER, P.C.  
1100 New York Avenue, N.W.  
Suite 750  
Washington, D.C. 20005-3934  
(202) 371-9500**

*Attorneys for The National Industrial  
Transportation League*

**Due Date: April 15, 1996**

**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

---

**Finance Docket No. 32760**

---

**UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY**

**— CONTROL AND MERGER —**

**SOUTHERN PACIFIC RAIL CORPORATION,  
SOUTHERN PACIFIC TRANSPORTATION COMPANY, ST. LOUIS  
SOUTHWESTERN RAILWAY COMPANY, SPCSL CORP. AND THE  
DENVER AND RIO GRANDE WESTERN RAILROAD COMPANY**

---

**THE NATIONAL INDUSTRIAL TRANSPORTATION LEAGUE'S  
OBJECTIONS AND RESPONSES TO APPLICANTS'  
SIXTH SET OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

---

The National Industrial Transportation League (the "NIT League or League") submits the following objections and responses to the sixth set of interrogatories and requests for production of documents served by Applicants on April 9, 1996 (UP/SP-210). These objections and responses are being made on this date in response to Applicants' request for prompt responses, even though it is the League's position that these discovery requests should not have been made pursuant to the expedited procedures adopted by the Administrative Law Judge at the discovery conference held on March 8, 1996. Tr. 2056-2065. These requests were served subject to the same definitions and instructions contained in applicants' prior discovery request to the League (UP/SP-124, served February

26, 1996). Therefore, in this response, the League is renewing those general and specific objections to the prior discovery that have not been resolved by a ruling of the Administrative Law Judge.

The NIT League is also submitting responses to the discovery requests. These responses will provide information (including documents, if any) in response to certain of the requests, notwithstanding the fact that objections to the requests are noted herein. It is necessary and appropriate at this stage for the NIT League to preserve its right to assert permissible objections.

### GENERAL OBJECTIONS

The following objections are made with respect to all of the interrogatories and document requests.

1. The NIT League objects to production of documents or information subject to the attorney-client privilege, including documents or information provided to parties or persons having a common interest in this proceeding.

2. The NIT League objects to production of documents or information subject to the work product doctrine, including documents or information otherwise provided to parties or persons having a common interest in this proceeding.

3. The NIT League objects to production of documents prepared in connection with, or information relating to, possible settlement of this or any other proceeding.

4. The NIT League objects to production of public documents that are readily available, including but not limited to documents on public file at the Board, the Securities and Exchange Commission, the Federal Energy Regulatory Commission, or from newspapers and other public media.



5. The NIT League objects to the production of draft verified statements and documents related thereto. In prior railroad consolidation proceedings, such documents have been treated by all parties as protected from production.

6. The NIT League objects to providing information or documents that are as readily obtainable by Applicants from its own files.

7. The NIT League objects to the extent that the interrogatories and document requests seek highly confidential or sensitive commercial information, including information designated as confidential or highly confidential in prior merger proceedings.

8. The NIT League objects to the definition of "shipper" and "relating to" and "produce" as unduly vague and/or overbroad.

9. The NIT League objects to Definitions and Instructions VIII, X, XI, XIII, XIV, XXXI, XXXII to the extent that they seek to impose requirements that exceed those specified in the applicable discovery rules and guidelines.

10. The NIT League objects to Definitions and Instructions VIII, X, XIII, XIV, XX and XXXII as unduly burdensome.

11. The NIT League objects to the interrogatories and document requests to the extent that they call for the preparation of special studies not already in existence.

12. The NIT League objects to the interrogatories and document requests to the extent that they call for speculation.

13. The NIT League objects to the interrogatories and document requests insofar as they call for information from or about individual members of the NIT League as beyond the scope of lawful and proper discovery to the NIT League; because such persons and information in the possession of such persons are beyond the direction and control of the NIT League; because such request would be overbroad and unduly burdensome; and because it includes requests for

information from or about such persons that is neither relevant or is reasonably calculated to lead to the discovery of admissible evidence.

Without waiving any of these general objections, responses to the interrogatories and document requests in UP/SP-210 specifically addressed to the League are set out below:

### **INTERROGATORIES**

9. Provide a list of any instances relied on by William G. Shepherd in his Verified Statement to support the statements at p.21, lines 20-21; p. 48, lines 6-11; and p. 49, note 52, including for each instance (1) the name of the shipper, (2) the name of the receiver, (3) the term of the contract, (4) the termination date of the contract, (5) the rail origination and destination city and state, and (6) the name and STCC code of the commodity covered by the contract. [NITL]

Response: See Comments of the Society of the Plastics Industry, Inc., SPI-11, at pages 24-25, and evidence there cited.

Respectfully submitted,

Nicholas J. DiMichael

Frederic L. Wood

Karyn A. Booth

DONELAN, CLEARY, WOOD & MASER, P.C.

1100 New York Avenue, N.W., Suite 750

Washington, D.C. 20005-3934

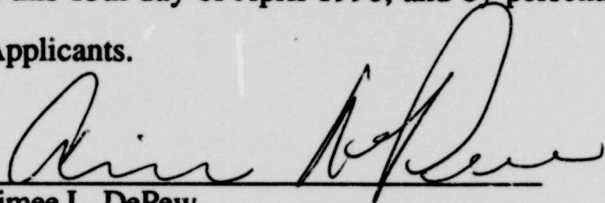
(202) 371-9500

*Attorneys for The National Industrial  
Transportation League*

Due Date: April 15, 1996

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing OBJECTIONS AND RESPONSES OF THE NATIONAL INDUSTRIAL TRANSPORTATION LEAGUE TO APPLICANTS' SIXTH SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS has been served by First Class Mail, postage prepaid, on all parties on the restricted service list in this proceeding on this 15th day of April 1996, and by personal delivery to Washington, D.C. counsel for Applicants.

  
Aimee L. DePew



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Item No. \_\_\_\_\_

Page Count 5

Apr #286

CUTLER & PICKERING

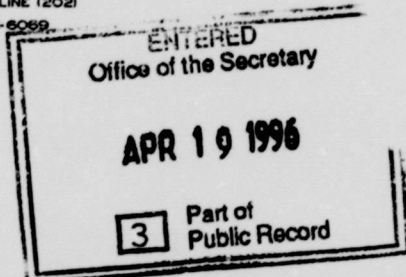
2445 M STREET, N.W.

WASHINGTON, D.C. 20037-1420

TELEPHONE (202) 663-6000  
FACSIMILE (202) 663-6363

JOSEPH E. KILLORY, JR.  
DIRECT LINE (202)

663-6069



April 15, 1996

**VIA HAND DELIVERY**

Mr. Vernon A. Williams  
Interstate Commerce Commission  
Case Control Branch  
Room 1324  
1201 Constitution Avenue, N.W.  
Washington, D.C. 20423



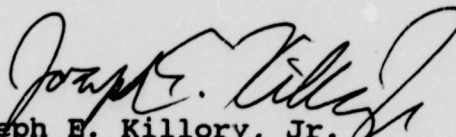
Re: Finance Docket No. 32760, Union Pacific  
Corporation, et al. -- Control and Merger --  
Southern Pacific Corporation, et al.

Dear Secretary Williams:

Enclosed for filing in the above-captioned case are one original and twenty copies of Consolidated Rail Corporation's Responses and Objections to Applicants' Fifth Set of Interrogatories and Requests For Production of Documents, designated as document CR-29.

Also enclosed is a 3.5-inch WordPerfect 5.1 disk containing the text of CR-29.

Sincerely,

  
Joseph E. Killory, Jr.  
Attorney for Consolidated  
Rail Corporation

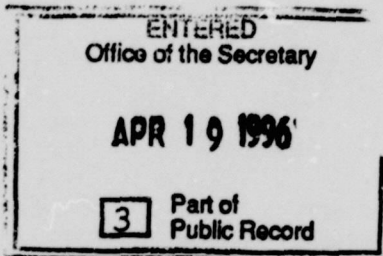
Enclosures

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4 CARLTON GARDENS  
LONDON SW1Y 5AA  
TELEPHONE 011 (4471) 839-4466  
FACSIMILE 011 (4471) 839-3537

RUE DE LA LOI 15 WETSTRAAT  
B-1040 BRUSSELS  
TELEPHONE 011 (322) 231-0903  
FACSIMILE 011 (322) 230-4322

FRIEDRICHSTRASSE 95  
BRIEFKASTEN 29  
D-10117 BERLIN  
TELEPHONE 011 (4930) 2643 3601  
FACSIMILE 011 (4930) 2643 3630



BEFORE THE  
SURFACE TRANSPORTATION BOARD



Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL AND MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY  
COMPANY, SPCSL CORP. AND THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY

CONSOLIDATED RAIL CORPORATION'S RESPONSES  
AND OBJECTIONS TO APPLICANTS' FIFTH SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Constance L. Abrams  
Jonathan M. Broder  
Anne E. Treadway  
CONSOLIDATED RAIL CORPORATION  
2001 Market Street  
Philadelphia, PA 19101

Daniel K. Mayers  
A. Stephen Hut, Jr.  
Joseph E. Killory, Jr.  
WILMER, CUTLER & PICKERING  
2445 M Street, N.W.  
Washington, D.C. 20037

April 15, 1996



BEFORE THE  
SURFACE TRANSPORTATION BOARD

---

Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL AND MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY  
COMPANY, SPCSL CORP. AND THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY

---

CONSOLIDATED RAIL CORPORATION'S RESPONSES  
AND OBJECTIONS TO APPLICANTS' FIFTH SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Consolidated Rail Corporation ("Conrail") hereby  
provides its responses and objections to the Fifth Set of  
Interrogatories and Document Requests served on Conrail by  
Applicants on April 8, 1996.

GENERAL RESPONSE AND GENERAL OBJECTIONS

Conrail incorporates herein by reference the General  
Response and General Objections set forth in its prior responses  
and objections to Applicants' First, Second and Third Sets of  
Interrogatories and Requests for Production of Documents.

SPECIFIC RESPONSES  
TO INDIVIDUAL REQUESTS

INTERROGATORIES

1. Do you have any information about any offers made  
by or on behalf of any party to this proceeding opposing the  
UP/SP merger, or anyone affiliated with such party, to provide

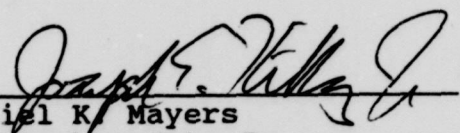
funds or other consideration to another such party to help finance its opposition efforts, and, if so, state that information and identify (and produce) any documents referring or relating to such offers. [You may exclude offers made to an association party by its members, or offers to finance work which was proffered to the Board as being jointly sponsored by the parties involved in the offer.] [Cen-Tex, CR, KCS, MRL, Tex Mex, CCRT, CMA, NITL, SPI, STRICT, WCTL, WSC]

Response: Conrail knows of none.

DOCUMENT REQUESTS

Neither of the two document requests are directed to Conrail.

Constance L. Abrams  
Jonathan M. Broder  
Anne E. Treadway  
CONSOLIDATED RAIL CORPORATION  
2001 Market Street  
Philadelphia, PA 19101

  
Daniel K. Mayers  
A. Stephen Hut, Jr.  
Joseph E. Killory, Jr.  
WILMER, CUTLER & PICKERING  
2445 M Street, N.W.  
Washington, D.C. 20037

April 15, 1996

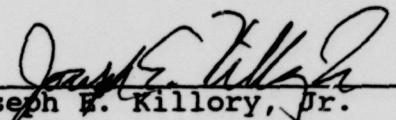
**CERTIFICATE OF SERVICE**

I certify that on this 15th day of April, 1996, a copy of the foregoing Consolidated Rail Corporation's Objections and Responses to Applicants' Fifth Set of Interrogatories and Requests for Production of Documents was served by hand delivery to:

Arvid E. Roach II  
S. William Livingston, Jr.  
Michael L. Rosenthal  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
P.O. Box 7566  
Washington, D.C. 20044

Paul A. Cunningham  
Richard B. Herzog  
James M. Guinivan  
Harkins Cunningham  
1300 Nineteenth Street, N.W.  
Washington, D.C. 20036

and served by facsimile transmission on all parties on the Restricted Service List.

  
\_\_\_\_\_  
Joseph E. Killory, Jr.



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Item No. \_\_\_\_\_

Page Count 20

Apr # 285

## & MINES, P.S.

800 Financial Center  
1215 Fourth Avenue  
Seattle, Washington 98161-1090  
Fax: 206-343-7053  
Phone: 206-292-9988

April 12, 1996

Honorable Vernon A. Williams  
Secretary  
Surface Transportation Board  
1201 Constitution Avenue N.W.  
Washington D.C. 20423

Re: Finance Docket No. 32760, Union Pacific Corp., et al. --  
Control and Merger -- Southern Pacific Corp. et al.

Dear Secretary Williams:

Here are Weyerhaeuser Company's Responses to Interrogatories and Requests for Production. We delivered them today, via United Parcel Service, for service upon the opposing counsel. A copy of the response and relevant documents were sent to Arvid Roach II, J. Michael Hemmer and Michael L. Rosenthal. A copy of the response was sent to Paul Cunningham.

Thank you.

Sincerely,

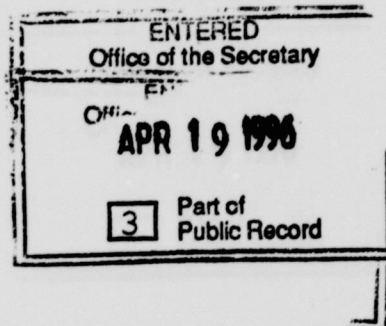
Stephen L. Day

aa

Enclosures

cc: Arvid Roach II, J. Michael Hemmer  
& Michael L. Rosenthal  
Covington & Burling  
1201 Pennsylvania Avenue N.W.  
Washington D.C. 20044-7566

Paul Cunningham  
Harkins & Cunningham  
130 Nineteenth Street N.W.  
Washington D.C. 20036



BEFORE THE  
SURFACE TRANSPORTATION BOARD  
UNITED STATES DEPARTMENT OF TRANSPORTATION



Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD  
COMPANY, and MISSOURI PACIFIC RAILROAD COMPANY

— — CONTROL AND MERGER — —

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS, SOUTHWESTERN  
RAILWAY COMPANY, SPCSL CORP., and THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY

WEYERHAEUSER COMPANY'S ANSWERS TO INTERROGATORIES  
AND RESPONSES TO REQUESTS FOR PRODUCTION

DATE: April 12, 1996

Stephen L. Day  
Jack A. Friedman  
Betts, Patterson & Mines, P.S.  
800 Financial Center  
1215 Fourth Avenue  
Seattle, WA 98161-1090  
(206) 292-9988

Attorneys for Weyerhaeuser Company

John B. Ficker  
Regulatory and Contract  
Support Manager  
Weyerhaeuser Company

ENTERED  
Office of the Secretary

APR 19 1996

3 Part of  
Public Record



### INTERROGATORIES

1. To the extent not done as part of your prior discovery responses or March 29 filings, identify and describe any agreements or understandings that you have with any other party to this proceeding regarding positions or actions to be taken in or otherwise relating to this proceeding, including any "joint defense" or "common interest" agreement, or confidentiality agreement on which you rely in objecting to discovery requests or invoking an informers privilege or other privilege. [Routine procedural agreements, such as agreements concerning the order of questioning at depositions or the avoidance of duplicative discovery, need not be identified. If Conrail contends that any aspect of such agreement is privileged, state the parties to, date of, and general subject of the agreement.] [All but CR, KCS, NITL]

-- ANSWER: Weyerhaeuser has no agreements or understandings with any other party to this proceeding relating to this proceeding. As stated in Weyerhaeuser's statement in opposition to this merger, Weyerhaeuser is a member of the National Industrial Transportation League and supports the League's position regarding this merger. Weyerhaeuser also agreed with the position set forth in, and is a signatory of, the Joint Shippers' Statement in Opposition. Weyerhaeuser is a member of the Chemical Manufacturers Association.

2. If you contend in your March 29 filings that reduction from 3-to-2 in the number of railroads serving various shippers or markets as a result of the merger is a reason for denying

approval, state whether you contend that two Class I railroads would always compete less vigorously than three Class I railroads would in any given market. [All but CR, KCS, NITL]

ANSWER: Weyerhaeuser objects to this question because it calls for speculation and conjecture. Nevertheless, Weyerhaeuser responds that it stands by its position "that a healthy rail-to-rail competitive market requires a minimum of three rail carriers." (See Weyerhaeuser Statement at 4.)

3. The testimony of Richard Peterson on behalf of Applicants describes, at pages 172-75, the views of a number of shippers with respect to competition between a merged UP/SP and BNSF. State whether you believe that those shippers are correct or incorrect in the expectations they have expressed in their statements filed in this proceeding concerning the effects of a UP/SP merger on competition and explain the reasons for that answer. [All but CR, KCS, NITL]

ANSWER: The Protective Order governing discovery evidence in this matter prevents Weyerhaeuser from reviewing material marked as highly confidential. Mr. Peterson's remarks are part of Volume 2, which was provided to Weyerhaeuser's outside counsel by applicants. Volume 2 has been marked by the applicants as "highly confidential." Weyerhaeuser has complied with the Protective Order and has not reviewed Mr. Peterson's remarks. Mr. Peterson's comments were not considered in preparing Weyerhaeuser's statement.

4. If you contend that there are significant investments in improvements of its railroad that SP could or should have

made, or can and should make, identify them and describe any rates of return, hurdle rates, or like standards you use for determining whether to invest in improvements in your business.

[All but CR, KCS, NITL]

ANSWER: Weyerhaeuser does not so contend.

5. Identify all shippers who you claim have expressed support for your position in this proceeding in your March 29 filings who are presently served at a point of origin or destination by both UP and SP directly. [All but CR, KCS, NITL]

ANSWER: Weyerhaeuser has not made any such claim as of this time.

6. State all facts supporting the contentions by Conrail witness Good that "SP is particularly aggressive about its pricing strategy" (Good V.S., p. 1) and that SP's pricing led other railroads (including UP) to reduce their prices, including, but not limited to, identity of shippers and receivers, identity of all bidders, commodities, origins and destinations of traffic, rates offered, and approximate dates of pricing actions. [The response need not include facts described on the face of Mr. Good's statement or in workpapers already produced to Applicants.] [CR]

ANSWER: Weyerhaeuser believes that this interrogatory was mistakenly addressed to it, and that this interrogatory should have been addressed solely to Conrail.

7. State all facts supporting the contentions by Conrail witness Bridges that "SP has a very aggressive pricing strategy" and "SP is almost always more price aggressive" (Bridges V.S.,



p. 3) and that SP's pricing led other railroads (including UP) to reduce their prices, including, but not limited to, identity of shippers and receivers, identity of all bidders, commodities, origins and destinations of traffic, rates offered, and approximate dates of pricing actions. [The response need not include any facts described on the face of Mr. Bridges' statement or in workpapers already produced to Applicants.] [CR]

ANSWER: Not addressed to Weyerhaeuser.

8. State all facts supporting the contentions by Conrail witness McNeil that "SP's bids are almost always lower" (McNeil V.S., p. 5) and that SP's pricing led other railroads (including UP) to reduce their prices, including, but not limited to, identity of shippers and receivers, identity of all bidders, commodities, origins and destinations of traffic, rates offered, and approximate dates of pricing actions. [The response need not include any facts described on the face of Mr. McNeil's statement or in workpapers already produced to Applicants.] [CR]

ANSWER: Not addressed to Weyerhaeuser.

9. Provide a list of any instances relied on by William G. Shepherd in his Verified Statement to support the statements at p. 21, lines 20-21; p. 48, lines 6-11; and p. 49, note 52, including for each instance (1) the name of the shipper, (2) the name of the receiver, (3) the term of the contract, (4) the termination date of the contract, (5) the rail origination and destination city and state, and (6) the name and STCC code of the commodity covered by the contract. [NITL]

ANSWER: Not addressed to Weyerhaeuser.

10. Provide a detailed listing of your El Paso traffic for 1994 and 1995, referred to at pp. 4-5 of the Verified Statement of David Brotherton, including carrier, commodity, origin, destination, and volume. [ASARCO]

ANSWER: Not addressed to Weyerhaeuser.

DOCUMENT REQUESTS

1. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents or data relied upon by any person whose verified statement you submitted in your March 29 filings. [All but CR, KCS, NITL]

RESPONSE: See attached documents numbered Weyer-0001 through Weyer-1141.

2. To the extent not done as part of your prior discovery responses or March 29 filings, produce machine-readable versions, if they exist, of documents or data you submitted as part of your March 29 filings, of documents or data included as work papers, or of documents or data relied upon by persons whose verified statement you submitted in your March 29 filings. [All but CR, KCS, NITL]

RESPONSE: Documents responsive to this request have already been produced in response to Document Request No. 1.

3. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, analyses or reports discussing benefits or efficiencies that may result from the UP/SP merger. [All but CR, KCS, NITL]

RESPONSE: Documents responsive to this request have already been produced in response to Document Request No. 1.

4. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, analyses or reports discussing potential traffic impacts of the UP/SP merger. [All but CR, KCS, NITL]

RESPONSE: Documents responsive to this request have already been produced in response to Document Request No. 1.

5. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses discussing competitive impacts of the UP/SP merger, including but not limited to effects on the following (a) market shares, (b) source or destination competition, (c) transloading options, or (d) build-in or build-out options. [All but CR, KCS, NITL]

RESPONSE: Documents responsive to this request have already been produced in response to Document Request No. 1.

6. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing the BN/Santa Fe Settlement Agreement, the IC Settlement Agreement, or the Utah Railway Settlement Agreement. [All but CR, KCS, NITL]

RESPONSE: See attached documents numbered **Weyer-1142** through **Weyer-1164**.

7. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents found in the files of officers at the level of Vice President or above, or



other files where such materials would more likely be found, discussing conditions that might be imposed on approval of the UP/SP merger. [All but CR, KCS, NITL]

**RESPONSE:** See attached documents numbered Weyer-1165 through Weyer-1173.

8. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing actual or potential competition between UP and SP. [All but CR, KCS, NITL]

**RESPONSE:** Documents responsive to this request have already been produced in response to the applicants' prior document requests.

9. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing competition between single-line and interline rail transportation. [All but CR, KCS, NITL]

**RESPONSE:** Documents responsive to this request have already been produced in response to the applicants' prior document requests.

10. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would

more likely be found, discussing the benefits of any prior Class I rail merger or rail mergers generally. [All but CR, KCS, NITL]

**RESPONSE:** Documents responsive to this request have already been produced in response to the applicants' prior document requests.

11. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing the financial position or prospects of SP, if those filings discussed that subject. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

12. To the extent not done as part of your prior discovery responses or March 29 filings, produce all communications with other parties to this proceeding discussing the UP/SP merger or the BN/Santa Fe Settlement Agreement, and all documents relating to such communications. [All but CR, KCS, NITL]

**RESPONSE:** Documents responsive to this request have already been produced in response to the applicants' prior document requests.

13. To the extent not done as part of your prior discovery responses or March 29 filings, produce all presentations, solicitation packages, form verified statements, or other materials used to seek support from public officials, or any

shipper or other party in this proceeding, for a position being taken or proposed or considered by you or any other party in this proceeding. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

14. To the extent not done as part of your prior discovery responses or March 29 filings, produce all presentations, letters, memoranda, white papers or other documents sent or given to DOJ, DOT, any state Governor's, Attorney General's or Public Utilities Commission's (or similar agency's) office, any other government official, any consultant, any chamber of commerce, or any shipper or trade organization relating to the UP/SP merger. [Even if not producing them, you should identify documents submitted to law enforcement officers under an explicit assurance of confidentiality.] [All but CR, KCS, NITL]

**RESPONSE:** See attached documents numbered Weyer-1174 through Weyer-1180.

15. To the extent not done as part of your prior discovery responses or March 29 filings, produce all notes or memoranda of any meetings with DOJ, DOT, any state Governor's, Attorney General's or Public Utilities Commission's (or similar agency's) office, any other government official, any consultant, any chamber of commerce, or any shipper or trade organization relating to the UP/SP merger. [You should identify but need not produce documents prepared by your counsel.] [All but CR, KCS, NITL]



**RESPONSE:** See attached documents numbered **Weyer-1181** through **Weyer-1195**.

16. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, analyses or reports discussing or reflecting shipper surveys or interviews concerning the quality of service or competitiveness of any railroad participating in this proceedings. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

17. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings discussed such a condition or sale, produce all documents discussing the price to be paid for, or the value of, any UP or SP lines that might be sold pursuant to a condition to approval of, or otherwise in connection with, the UP/SP merger. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

18. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents discussing trackage rights compensation for any of the BN/Santa Fe Settlement Agreement Lines, or any other line of UP or SP that you believe should or might be the subject of a proposed trackage rights condition in this proceeding. [All but CR, KCS, NITL]

**RESPONSE:** Documents responsive to this request have already been produced in response to the applicants' prior document requests.

19. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents relating to actual or estimated maintenance-and-operating costs, taxes and return-to-capital costs with respect to any of the BN/Santa Fe Settlement Agreement Lines, or any other line of UP or SP that you believe should or might be the subject of a proposed trackage rights condition in this proceeding. [All but CR, KCS, NITL]

**RESPONSE:** Documents responsive to this request have already been produced in response to the applicants' prior document requests.

20. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents relating to any agreement or understanding that is responsive to Interrogatory 1. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

21. To the extent not done as part of your prior discovery responses or March 29 filings, produce all presentations to, and minutes of, your board of directors relating to the UP/SP merger or conditions to be sought by any other party in this proceeding. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

22. To the extent not done as part of your prior discovery responses or March 29 filings, produce all your business plans or strategic plans, if those filings referred to the possible impact of the merger on your future business. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

23. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings cite, rely upon, endorse or purport to agree with analyses by any of the following persons, produce all communications with Richard C. Levin, Curtis M. Grimm, James M. MacDonald, Clifford J. Winston, Thomas M. Corsi, Carol A. Evans or Steven Salop concerning econometric analyses of rail pricing, and all documents relating to such communications. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

24. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings discuss that subject, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing competition for traffic to or from Mexico (including but not limited to truck competition) or competition among Mexican gateways. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

25. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents sufficient to show your financial support for, establishment of, participation in, or relationship with the "Coalition for



Competitive Rail Transportation," which made a March 29 filing denominated CCRT-4. [All but CR, KCS, NITL]

RESPONSE: Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

26. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings discuss that subject, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing competition in freight transportation services for shipments to or from West Coast ports. [All but CR, KCS, NITL]

RESPONSE: Weyerhaeuser's filing did not discuss this subject.

27. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings disagree in any significant way with the description of SP's financial situation in the Application, produce all documents found in the files of officers at the level of Vice President or above, discussing any possible breakup or bankruptcy of SP. [All but CR, KCS, NITL]

RESPONSE: Weyerhaeuser's filing did not discuss this subject.

28. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents found in the files of officers at the level of Vice President or above, discussing your reasons for opposing the UP/SP merger or seeking to acquire any portion of SP in connection with the UP/SP merger. [All but CR, KCS, NITL]

**RESPONSE:** See attached documents numbered Weyer-1196 through Weyer-1202.

29. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings address a sale of all or part of SP, produce all documents found in the files of officers at the level of Vice President or above, discussing the value or profitability of SSW. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

30. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents relating to any proposal you made for possible line sales or trackage rights in your favor or for your benefit as a condition to the UP/SP merger, proposal, including but not limited to (a) documents describing the proposal, (b) any market analysis with respect to the proposal, (c) any operating plan with respect to the proposal, and (d) any pro forma financial statements with respect to the proposal. [All but CR, KCS, NITL]

**RESPONSE:** Weyerhaeuser objects to the term "proposal" as being vague and ambiguous. Documents responsive to this request have already been produced in response to the applicants' prior document requests.

31. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, analyses or reports discussing the possibility of a build-in by one of the applicants (or build-out to one of the applicants) at any of your

facilities referred to in your March 29 filings. [All but CR, KCS, NITL]

RESPONSE: Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

32. Produce all presentations to, and minutes of, your board of directors relating to the UP/SP merger or conditions to be sought by you or any party in this proceedings. [All but CR, KCS, NITL]

RESPONSE: Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

33. Produce all studies, reports or analyses relating to collusion among competing railroads or the risk thereof. [All but CR, KCS, NITL]

RESPONSE: See attached documents numbered Weyer-1203 through Weyer-1206.

34. Produce all public statements by your President or other executives at the level of Vice President or above relating to the UP/SP merger. [All but CR, KCS, NITL]

RESPONSE: Weyerhaeuser has found no documents responsive to this request, other than those already produced (if any).

35. Produce your annual reports to stockholders for years 1991 through 1995. [All but CR, KCS, NITL]

RESPONSE: See attached documents numbered Weyer-1207 through Weyer-1598.

36. Produce all documents supporting or otherwise relating to the facts provided in responses to Interrogatories 6-8. [CR]

RESPONSE: Not addressed to Weyerhaeuser.



37. Produce the publication listed as the third item on p. 153 of the Verified Statement of James MacDonald. [KCS]

RESPONSE: Not addressed to Weyerhaeuser.

ANSWERS AND RESPONSES dated this 12<sup>TH</sup> day of April, 1996.

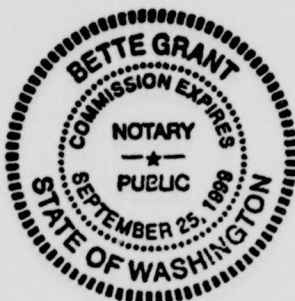
STATE OF WASHINGTON           )  
  )     ss.  
COUNTY OF KING               )

Jack A. Friedman, being first duly sworn, deposes and says:

I am the attorney for Weyerhaeuser Company, to which the foregoing interrogatories and requests for production are addressed, and I am authorized to make this verification on behalf of said corporation. I have read the foregoing answers to interrogatories and responses to requests for production, know the contents thereof, and believe the same to be true.

[Signature]  
Jack A. Friedman

Signed and sworn to before me on April 12, 1996.



[Signature]  
Notary Public in and for the State of Washington

Printed Name: BETTE GRANT

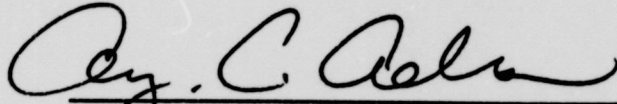
My appointment expires: 9/25/98

BETTE PATTERSON & MINES, P.S.

By [Signature]  
Stephen L. Day, WSBA #11798  
Attorneys for Weyerhaeuser Company

CERTIFICATE OF SERVICE

I hereby certify that on April 12, 1996, I served the foregoing document, Weyerhaeuser Company's Answers to Interrogatories and Responses to Requests for Production, on the propounding party, by United Parcel Service.

  
\_\_\_\_\_  
Amy C. Adams

STB

FD

32760

4-12-96

D.

81342



Item No. \_\_\_\_\_

Page Count 3

Apr #281

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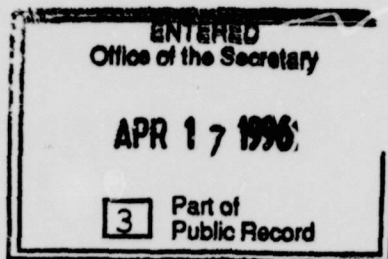


WILLIAM F. JACKSON, JR.  
DAVID C. REEVES  
JOHN T. SULLIVAN  
JOHN R. COFLEY

April 12, 1996

OSWALD E. JESSUP  
(1911-1994)

Mr. Vernon A. Williams  
Secretary  
Surface Transportation Board  
12th & Constitution Ave., N.W.  
Washington, DC 20423



Re: Union Pacific Corp., Union Pacific Railroad Co., and Missouri Pacific Railroad Co.--Control and Merger--Southern Pacific Rail Corp., Southern Pacific Transportation Co., St. Louis Southwestern Railway Co., SPCSL Corp. and The Denver and Rio Grande Western Railroad Co.

Finance Docket No. 32760

Dear Mr. Williams:

Enclosed please find the original and 20 copies of STRC-9, the Responses to Applicants' Fifth Set of Interrogatories and Requests for Production of Documents, UP/SP-209, filed on behalf of Save the Rock Island Committee, Inc. ("STRICT"). Also enclosed is a 3.5-inch computer diskette containing said document in WordPerfect 5.1 format.

As can be seen from the certificate of service included with STRICT's response, a copy of said response is being served on this date on all known parties of record to the above-captioned proceeding.

Very truly yours,

William F. Jackson, Jr.

WPJ/jmb

Enclosures

cc: Mr. Jim Link

BEFORE THE  
SURFACE TRANSPORTATION BOARD  
WASHINGTON, D.C.



STRC-9

UNION PACIFIC CORP., UNION PACIFIC  
RAILROAD CO., AND MISSOURI PACIFIC  
RAILROAD CO.--CONTROL AND MERGER--  
SOUTHERN PACIFIC RAIL CORP., SOUTHERN  
PACIFIC TRANSPORTATION CO., ST. LOUIS  
SOUTHWESTERN RAILWAY CO., SPCSL CORP. AND THE  
DENVER AND RIO GRANDE WESTERN RAILROAD CO.

: Finance Docket No. 32760

RESPONSE OF SAVE THE ROCK ISLAND COMMITTEE, INC.,  
TO APPLICANTS' FIFTH SET OF INTERROGATORIES

Comes now Save the Rock Island Committee, Inc. (STRICT), and submits its  
reply to Interrogatory No. 1 of Applicants' Fifth Set of Interrogatories and  
Requests for Production of Documents, UP/SP-209, served April 8, 1996.

Interrogatory and Response

Without waiving any objections which STRICT has to this and any  
subsequent discovery which Applicants may serve upon it, STRICT responds to  
Applicants' Interrogatory No. 1 as follows:

Interrogatory: "Do you have any information about any offers made by or  
on behalf of any party to this proceeding opposing the UP/SP merger, or anyone  
affiliated with such party, to provide funds or other consideration to another  
such party to help finance its opposition efforts, and, if so, state that  
information and identify (and produce) any documents referring or relating to  
such offers. [You may exclude offers made to an association party by its  
members, or offers to finance work which was proffered to the Board as being  
jointly sponsored by the parties involved in the offer.]"

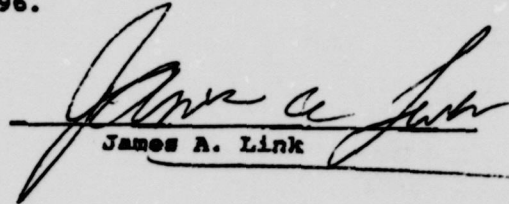
Response: No. However, if any party wishes to contribute to STRICT's  
efforts regarding rail service on the old Rock Island line between St. Louis  
and Kansas City, contributions will be gratefully accepted, including

anonymous ones. Checks, money orders, or other negotiable instruments should be made payable to Save the Rock Island Committee, and may be mailed to STRICT at Post Office Box 355, Eldon, MO 65026.

VERIFICATION

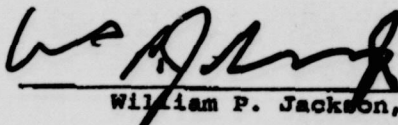
I, James A. Link, declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of April, 1996.

  
James A. Link

CERTIFICATE OF SERVICE

I, William P. Jackson, Jr., counsel for Save the Rock Island Committee, Inc. ("STRICT"), certify that on this 12<sup>th</sup> day of April, 1996, I caused a copy of STRICT's Responses to Applicants' Fifth Set of Interrogatories and Requests for Production of Documents, UP/SP-209, to be served by first-class mail, postage prepaid, or by a more expeditious manner of delivery, on all known parties of record in Finance Docket No. 32760.

  
William P. Jackson, Jr.



STB

FD

32760

4-12-96

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81335

Item No. \_\_\_\_\_

Page Count 11

Apr #275

LAW OFFICES

SCOUTT & RASENBERGER, L.L.P.

888 SEVENTEENTH STREET, N.W.

WASHINGTON, D.C. 20006-3939

TELEPHONE : (202) 298-8660

FACSIMILES: (202) 342-0683

(202) 342-1316

81335

April 12, 1996

Via Hand Delivery

Vernon A. Williams  
Secretary  
Surface Transportation Board  
Room 2215  
12th Street & Constitution Avenue, N.W.  
Washington, D.C. 20423



Re: Union Pacific Corp., Union Pacific RR. Co. and Missouri Pacific RR Co. -- Control and Merger -- Southern Pacific Rail Corp., Southern Pacific Transp. Co., St. Louis Southwestern R.W. Co., SPCSL Corp. and The Denver and Rio Grande Western RR Co.,  
Finance Docket No. 32760

Dear Secretary Williams:

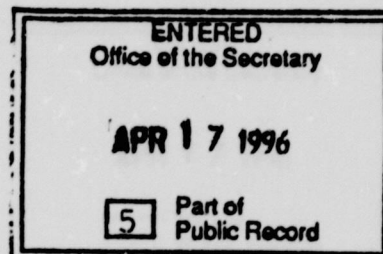
Enclosed for filing are: 1) an original and twenty copies of the Highly Confidential version of TM-28, Errata to Certain Verified Statements Contained in the Responsive Application of The Texas Mexican Railway Company; and 2) 20 copies of the Redacted version of TM-28 for filing on the public record. Also enclosed is a 3.5" floppy computer disc containing a copy of each of the filings in Wordperfect 5.1 format.

Sincerely,

*Richard A. Allen*

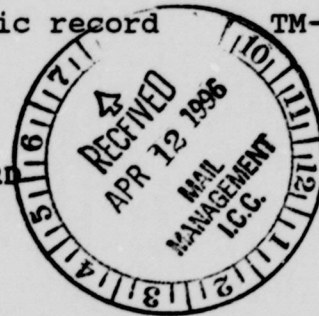
Richard A. Allen

Enclosures



REDACTED - to be filed on the public record TM-28

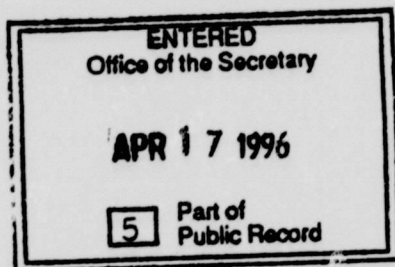
BEFORE THE  
SURFACE TRANSPORTATION BOARD



Union Pacific Corp., Union Pacific )  
RR. Co. and Missouri Pacific RR Co.)  
-- Control and Merger -- Southern )  
Pacific Rail Corp., Southern )  
Pacific Trans. Co., St. Louis )  
Southwestern Rw. Co., SPCSL Corp. )  
and The Denver and Rio Grande )  
Western Corp. )

Finance Docket No. 32760

ERRATA TO  
CERTAIN VERIFIED STATEMENTS  
CONTAINED IN  
THE RESPONSIVE APPLICATION OF  
THE TEXAS MEXICAN RAILWAY COMPANY



Richard A. Allen  
Andrew R. Plump  
John V. Edwards  
Zuckert, Scoutt & Rasenberger, LLP  
Brawner Building  
888 17th Street, N.W.  
Washington, D.C. 20006-3939  
(202) 298-8660

Attorneys for The Texas  
-Mexican-Railway Company

April 12, 1996



BEFORE THE  
SURFACE TRANSPORTATION BOARD

Union Pacific Corp., Union Pacific )  
RR. Co. and Missouri Pacific RR Co.)  
-- Control and Merger -- Southern )  
Pacific Rail Corp., Southern )  
Pacific Trans. Co., St. Louis )  
Southwestern Rw. Co., SPCSL Corp. )  
and The Denver and Rio Grande )  
Western Corp. )

Finance Docket No. 32760

ERRATA TO  
CERTAIN VERIFIED STATEMENTS  
CONTAINED IN  
THE RESPONSIVE APPLICATION OF  
THE TEXAS MEXICAN RAILWAY COMPANY

Verified Statement of Larry Fields:

The Texas Mexican Railway Company ("Tex Mex"), hereby  
submits the following errata to the verified statement of Larry  
Fields which was contained in Tex Mex's Responsive Application  
(TM-25):

<u>Page</u>	<u>Line</u>	<u>Change</u>
43	20	Change "57%" to "55%"

**Verified Statement of Joseph F. Ellebracht:**

Tex Mex hereby submits the following errata to the verified statement of Joseph F. Ellebracht which was contained in Tex Mex's Responsive Application (TM-25):

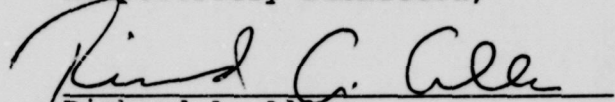
<u>Page</u>	<u>Line</u>	<u>Change</u>
71	26	Change "Several UP's" to "Several of UP's"
77		
77		
77		
79	Footnote 7	Change "Lyndon Johnson, School" to "Lyndon B. Johnson School"
80	8 to 9	Change "trackage rights or, more likely, haulage rights" to "trackage rights or haulage rights"
81	24	Add "range" between "this" and "the"
82	11	Change "not be so as" to "not be very"
85	14	Change "although" to "Although"
85	18	Change "served" to "serves"
87	table	Change the contents of the last row in the last column of the table from "+4%" to "+0.4%"

**Curtis M. Grimm:**

Tex Mex hereby submits the following errata to the verified statement of Curtis M. Grimm which was contained in Tex Mex's Responsive Application (TM-25):

<u>Page</u>	<u>Line</u>	<u>Change</u>
121	19	Add "through the Texas rail gateways" after "Mexico"
122	6	Add "through the Texas rail gateways" after "Mexico"

Respectfully submitted,



Richard A. Allen  
Andrew R. Plump  
John V. Edwards  
ZUCKERT, SCOUTT & RASENBERGER, LLP  
888 Seventeenth St., NW, Suite 600  
Washington, DC 20006-3939

Attorneys for Texas Mexican Railway

Dated: March 12, 1996



CERTIFICATE OF SERVICE

I hereby certify that, on this 12th day of April, I have caused to be served TM-27, the Supplemental Responses of the Texas Mexican Railway Company to the Applicants' First and Second Set of Interrogatories and Requests for the Production of Documents, by hand delivery upon the following persons:

Arvid E. Roach II  
J. Michael Hemmer  
Michael L. Rosenthal  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20044-7566

Paul A. Cunningham  
Richard B. Herzog  
James M. Guinivan  
Harkins, Cunningham  
Suite 600  
1300 Nineteenth Street, N.W.  
Washington, D.C. 20036

I have also caused the foregoing to be served by first-class mail, postage pre-paid, or by a more expeditious manner of delivery, on all parties of record in Finance Docket No. 32760.

---

John V. Edwards  
Zuckert, Scoutt  
& Rasenberger, L.L.P.  
Brawner Building  
888 17th Street, N.W.  
Washington, D.C. 20006-3959  
(202) - 298-8660

Dated: April 12, 1996

BEFORE THE  
SURFACE TRANSPORTATION BOARD

Union Pacific Corp., Union Pacific )  
RR. Co. and Missouri Pacific RR Co.)  
-- Control and Merger -- Southern )  
Pacific Rail Corp., Southern )  
Pacific Trans. Co., St. Louis )  
Southwestern Rw. Co., SPCSL Corp. )  
and The Denver and Rio Grande )  
Western Corp. )

Finance Docket No. 32760

ERRATA TO  
CERTAIN VERIFIED STATEMENTS  
CONTAINED IN  
THE RESPONSIVE APPLICATION OF  
THE TEXAS MEXICAN RAILWAY COMPANY

Richard A. Allen  
Andrew R. Plump  
John V. Edwards  
Zuckert, Scoutt & Rasenberger, LLP  
Brawner Building  
888 17th Street, N.W.  
Washington, D.C. 20006-3939  
(202) 298-8660

Attorneys for The Texas  
Mexican Railway Company

April 12, 1996

BEFORE THE  
SURFACE TRANSPORTATION BOARD

Union Pacific Corp., Union Pacific )  
RR. Co. and Missouri Pacific RR Co.)  
-- Control and Merger -- Southern )  
Pacific Rail Corp., Southern )  
Pacific Trans. Co., St. Louis )  
Southwestern Rw. Co., SPCSL Corp. )  
and The Denver and Rio Grande )  
Western Corp. )

Finance Docket No. 32760

ERRATA TO  
CERTAIN VERIFIED STATEMENTS  
CONTAINED IN  
THE RESPONSIVE APPLICATION OF  
THE TEXAS MEXICAN RAILWAY COMPANY

Verified Statement of Larry Fields:

The Texas Mexican Railway Company ("Tex Mex"), hereby  
submits the following errata to the verified statement of Larry  
Fields which was contained in Tex Mex's Responsive Application  
(TM-25):

<u>Page</u>	<u>Line</u>	<u>Change</u>
43	20	Change "57%" to "55%"



**Verified Statement of Joseph F. Ellebracht:**

Tex Mex hereby submits the following errata to the verified statement of Joseph F. Ellebracht which was contained in Tex Mex's Responsive Application (TM-25):

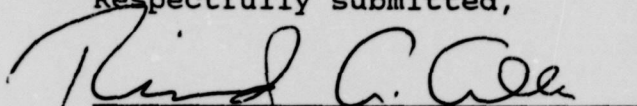
<u>Page</u>	<u>Line</u>	<u>Change</u>
71	26	Change "Several UP's" to "Several of UP's"
77	3	Change "94.8" to "94.9"
77	table	Replace the blank row with the following in the Gateway, Rail Tons, UP share, SP share, BNSF share, and Other columns, respectively: "Other", "342,765", "0.0%", "100.0", "0.0%"; "None"  Replace the "Total" row with the following in the Rail Tons, UP share, SP share, BNSF share, and Other columns, respectively: "17,593,848", "59.8%", "35.1%", "3.2%", and "2.0% - TM"
77	7	Change "94.8" to "94.9"
79	Footnote 7	Change "Lyndon Johnson, School" to "Lyndon B. Johnson School"
80	8 to 9	Change "trackage rights or, more likely, haulage rights" to "trackage rights or haulage rights"
81	24	Add "range" between "this" and "the"
82	11	Change "not be so as" to "not be very"
85	14	Change "although" to "Although"
85	18	Change "served" to "serves"
87	table	Change the contents of the last row in the last column of the table from "+4%" to "+0.4%"

**Curtis M. Grimm:**

Tex Mex hereby submits the following errata to the verified statement of Curtis M. Grimm which was contained in Tex Mex's Responsive Application (TM-25):

<u>Page</u>	<u>Line</u>	<u>Change</u>
121	19	Add "through the Texas rail gateways" after "Mexico"
122	6	Add "through the Texas rail gateways" after "Mexico"

Respectfully submitted,



Richard A. Allen

Andrew R. Plump

John V. Edwards

ZUCKERT, SCOUTT & RASENBERGER, LLP

888 Seventeenth St., NW, Suite 600

Washington, DC 20006-3939

Attorneys for Texas Mexican Railway

Dated: March 12, 1996

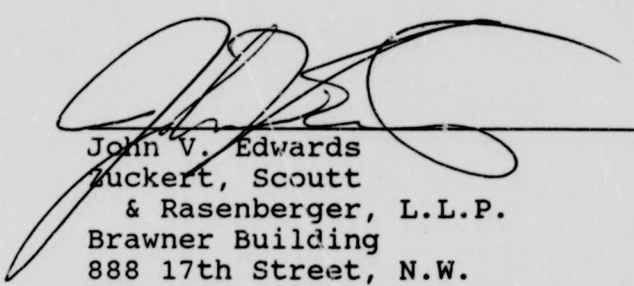
CERTIFICATE OF SERVICE

I hereby certify that, on this 12th day of April, I have caused to be served TM-27, the Supplemental Responses of the Texas Mexican Railway Company to the Applicants' First and Second Set of Interrogatories and Requests for the Production of Documents, by hand delivery upon the following persons:

Arvid E. Roach II  
J. Michael Hemmer  
Michael L. Rosenthal  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20044-7566

Paul A. Cunningham  
Richard B. Herzog  
James M. Guinivan  
Harkins, Cunningham  
Suite 600  
1300 Nineteenth Street, N.W.  
Washington, D.C. 20036

I have also caused the foregoing to be served by first-class mail, postage pre-paid, or by a more expeditious manner of delivery, on all parties of record in Finance Docket No. 32760.



John V. Edwards  
Zuckert, Scoutt  
& Rasenberger, L.L.P.  
Brawner Building  
888 17th Street, N.W.  
Washington, D.C. 20006-3959  
(202) 298-8660

Dated: April 12, 1996



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Item No. \_\_\_\_\_

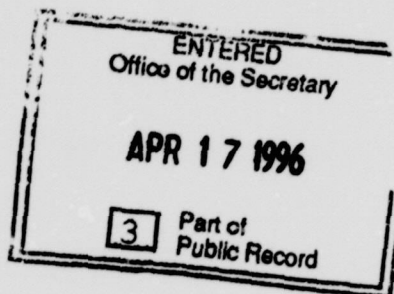
Page Count \_\_\_\_\_

Apr #270



U. S. Department of Justice  
Antitrust Division

325 7th Street, N.W.  
Washington, DC 20530



April 12, 1996

BY HAND

Mr. Vernon A. Williams  
Secretary  
Surface Transportation Board  
12th and Constitution Avenue, N.W.  
Room 2215  
Washington, D.C. 20423

Re: Union Pacific Corp., et al. -- Control and  
Merger-- Southern Pacific Rail Corp., et al.  
Finance Docket No. 32760

Dear Secretary Williams:

I am enclosing for filing an original and twenty copies of the Comments of the United States Department of Justice (DOJ-8 and DOJ-9). DOJ-8 contains the comments of the Department and the verified statements of three witnesses. DOJ-9 contains data attachments to the verified statement of W. Robert Majure. Both of these volumes contain highly confidential material and are to be filed under seal. I am also enclosing twenty copies of a public (redacted) version of DOJ-8. Finally, I am enclosing a 3.5 inch disk containing the comments and verified statements in Word Perfect 5.1 format.

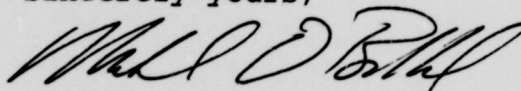
I understand that the Board has requested that parties file any deposition testimony cited when making evidentiary filings, and that it has asked Judge Nelson to take up this matter at today's discovery conference. We will file deposition testimony cited in this filing in accordance the procedures ordered by Judge Nelson.

We are serving this filing on the Applicants and the redacted version on all parties of record. In addition we are

serving the highly confidential version on parties known by the Department to be entitled to access to highly confidential material under the protective order in this proceeding.

Please call me if you have any questions about this filing at (202) 307-6666.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Michael D. Billiel", written in a cursive style.

Michael D. Billiel  
Attorney  
Antitrust Division

Enclosures

cc: Parties of Record



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Item No. \_\_\_\_\_

81329

Page Count 6

LAW OFFICES

Apr #273

**OUTT & RASENBERGER, L.L.P.**

333 SEVENTEENTH STREET, N.W.

WASHINGTON, D.C. 20006-3939

TELEPHONE : (202) 298-8660

FACSIMILES: (202) 342-0683

(202) 342-1316



April 12, 1996

Via Hand Delivery

Vernon A. Williams  
Secretary  
Surface Transportation Board  
Room 2215  
12th Street & Constitution Avenue, N.W.  
Washington, D.C. 20423

Re: Union Pacific Corp., Union Pacific RR. Co. and Missouri Pacific RR Co. -- Control and Merger -- Southern Pacific Rail Corp., Southern Pacific Transp. Co., St. Louis Southwestern Rv. Co., SPCSL Corp. and The Denver and Rio Grande Western RR Co.,  
Finance Docket No. 32760

Dear Secretary Williams:

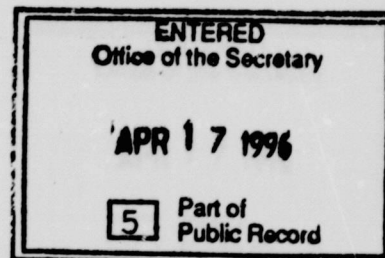
Enclosed for filing are an original and twenty copies of TM-29, the Response of The Texas Mexican Railway Company to the Applicants' Fifth Set of Interrogatories and Request for Production of Documents. Also enclosed is a 3.5" floppy computer disc containing a copy of each of the filings in Wordperfect 5.1 format.

Sincerely,

Richard A. Allen

Enclosures

cc: Restricted Service List



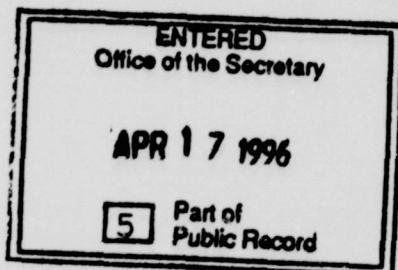
BEFORE THE  
SURFACE TRANSPORTATION BOARD



Union Pacific Corp., Union Pacific )  
RR. Co. and Missouri Pacific RR Co.)  
-- Control and Merger -- Southern )  
Pacific Rail Corp., Southern )  
Pacific Trans. Co., St. Louis )  
Southwestern Rw. Co., SPCSL Corp. )  
and The Denver and Rio Grande )  
Western Corp. )

Finance Docket No. 32760

RESPONSES OF  
THE TEXAS MEXICAN RAILWAY COMPANY  
TO THE APPLICANTS'  
FIFTH SET OF  
INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS



Richard A. Allen  
Andrew R. Plump  
John V. Edwards  
Zuckert, Scoutt & Rasenberger, LLP  
Brawner Building  
888 17th Street, N.W.  
Washington, D.C. 20006-3939  
(202) 298-8660

Attorneys for The Texas  
Mexican Railway Company

April 12, 1996



BEFORE THE  
SURFACE TRANSPORTATION BOARD

Union Pacific Corp., Union Pacific )  
RR. Co. and Missouri Pacific RR Co.)  
-- Control and Merger -- Southern )  
Pacific Rail Corp., Southern )  
Pacific Trans. Co., St. Louis )  
Southwestern Rw. Co., SPCSL Corp. )  
and The Denver and Rio Grande )  
Western Corp. )

Finance Docket No. 32760

RESPONSES OF  
THE TEXAS MEXICAN RAILWAY COMPANY  
TO THE APPLICANTS'  
FIFTH SET OF  
INTERROGATORIES AND REQUEST  
FOR PRODUCTION OF DOCUMENTS

The Texas Mexican Railway Company ("Tex Mex"), hereby  
submits its response to the Applicants' Fifth Set of  
Interrogatories and Request for Production of Documents to Tex  
Mex served by the Applicants<sup>1/</sup> on April 8, 1996.

<sup>1/</sup> Union Pacific Corporation, Union Pacific Railroad Company,  
Missouri Pacific Railroad Company, Southern Pacific Rail  
Corporation, Southern Pacific Transportation Company, St. Louis  
Southwestern Railway Company, SPCSL Corporation, and the Denver  
and Rio Grande Western Railroad Company.

### GENERAL RESPONSES

Tex Mex incorporates by reference the general responses it made in its initial response to the Applicants' First Interrogatories and Document Requests to Tex Mex (TM-19).

### GENERAL OBJECTIONS

Tex Mex incorporates by reference the general objections it made in its initial response to the Applicants' First Interrogatories and Document Requests to Tex Mex (TM-19).

### RESPONSES TO SPECIFIC INTERROGATORIES AND DOCUMENT REQUESTS

Tex Mex hereby supplements its response to the following interrogatories:

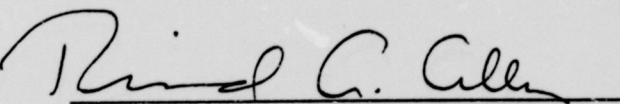
#### Interrogatory 1.

"Do you have any information about any offers made by or on behalf of any party to this proceeding opposing the merger, or anyone affiliated with such party, to provide funds or other consideration to another such party to help finance its opposition efforts, and, if so, state that information and identify (and produce) any documents referring or relating to such offers. [You may exclude offers made to an association party by its members, or offers to finance work which was proffered to the Board as being jointly sponsored by the parties involved in the offer.]"

#### Response:

No.

Respectfully submitted,

  
Richard A. Allen

Andrew R. Plump  
John V. Edwards  
ZUCKERT, SCOUTT & RASENBERGER, LLP  
888 Seventeenth St., NW, Suite 600  
Washington, DC 20006-3939

Attorneys for Texas Mexican Railway

Dated: March 12, 1996



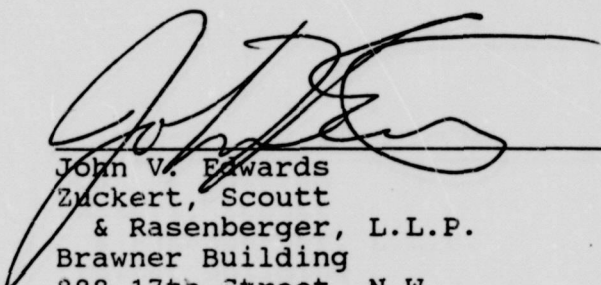
CERTIFICATE OF SERVICE

I hereby certify that, on this 12th day of April, I have caused to be served TM-29, the Response of the Texas Mexican Railway Company to the Applicants' Fifth Set of Interrogatories and Requests for the Production of Documents, by hand delivery upon the following persons:

Arvid E. Roach II  
J. Michael Hemmer  
Michael L. Rosenthal  
Covington & Burling  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20044-7566

Paul A. Cunningham  
Richard B. Herzog  
James M. Guinivan  
Harkins, Cunningham  
Suite 600  
1300 Nineteenth Street, N.W.  
Washington, D.C. 20036

I have also caused the foregoing to be served by first-class mail, postage pre-paid, or by a more expeditious manner of delivery, on the Honorable Judge Nelson all parties on the restricted service list in Finance Docket No. 32760.



John V. Edwards  
Zuckert, Scoutt  
& Rasenberger, L.L.P.  
Brawner Building  
888 17th Street, N.W.  
Washington, D.C. 20006-3959  
(202) 298-8660

Dated: April 12, 1996

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Item No. \_\_\_\_\_

Page Count 14

Apr # 248

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Public Record

81293

KCS-37

BEFORE THE  
SURFACE TRANSPORTATION BOARD

Finance Docket No. 32760



UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY

-- CONTROL AND MERGER --

SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY  
COMPANY, SPCSL CORP. AND THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY

THE KANSAS CITY SOUTHERN RAILWAY COMPANY'S RESPONSES TO  
APPLICANTS' THIRD SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Richard P. Bruening  
Robert K. Dreiling  
The Kansas City Southern  
Railway Company  
114 West 11th Street  
Kansas City, Missouri 64105  
Tel: (816)556-0392  
Fax: (816)556-0227

John R. Molm  
Alan E. Lubel  
William A. Mullins  
Troutman Sanders LLP  
601 Pennsylvania Avenue, N.W.  
Suite 640-North Building  
Washington, D.C. 20004-2609  
Tel: (202)274-2950  
Fax: (202)274-2994

James F. Rill  
Sean F.X. Boland  
Virginia R. Mettallo  
Collier, Shannon, Rill & Scott  
3050 K Street, N.W.  
Suite 400  
Washington, D.C. 20007  
Tel: (202)342-8400  
Fax: (202)338-5534

Attorneys for the Kansas City Southern Railway Company

April 10, 1996



The Kansas City Southern Railway Company ("KCS") responds to Applicants' Third Set of Interrogatories and Requests for Production of Documents as follows:

KCS reasserts and incorporates by reference, its General Objections to Applicants' discovery requests as set forth in KCS-28, paragraphs 3 through 13. Subject to these objections and to prior rulings by Administrative Law Judge Nelson in this proceeding, KCS responds to Applicants' individual interrogatories as follows:

Interrogatories

5. If you contend that there are significant investments in improvements of its railroad that SP could or should have made, or can and should make, identify them and describe any rates of return, hurdle rates, or like standards you use for determining whether to invest in improvements in your business. [All but Govts, Assns]

RESPONSE: KCS incorporates its response to Interrogatory No. 10 contained in KCS-35.

14. Identify all persons (other than Hunt and Oderwald) who assisted in the preparation of the study discussed in the Hunt/Oderwald statement. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

15. Identify each new location (as compared to the 1994 Waybill Sample) in the Quantanet Intercarrier Routing Model used in the study produced by Hunt and Oderwald where BN/Santa Fe was treated as able to originate and terminate traffic by reason of the BN/Santa Fe Settlement. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

16. For each new location identified in response to the preceding question, state whether for purposes of the study presented by Hunt and Oderwald BN/Santa Fe was treated as able to originate or terminate traffic directly. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

17. Identify and describe any and all limitations imposed as part of the study prepared by ALK Associates, Inc. on the ability of BN/Santa Fe to originate, terminate, or carry traffic, including without limitation: (a) any geographic limitation; (b) any minimum volume thresholds applied to locations; and (c) any limitations related to voluntary haulage agreements. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS

and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

18. State whether railroad origins and destinations as referenced in the first full paragraph of page 4 of the verified statement of Hunt and Oderwald were defined on the basis of Business Economic Area (BEA): (a) for intermodal traffic, and (b) for automobile traffic. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

19. Identify and describe all adjustments made by ALK Associates, Inc. and used in the study presented by Hunt and Oderwald to the 1994 ICC Waybill Sample or to the network used as part of the ATD model, including, without limitation, adjustments:

- a. to account for changes in railroad ownership, operations, or operating rights that have taken place since 1994.
- b. to account for rebilling of freight traffic.
- c. to model nodes where more than one Standard Point Location Code was assigned to a node.
- d. to account for intermodal traffic to and from truck hub locations. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS



and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

20. Identify and explain any reassignments of tri-level and intermodal movements to new or different nodes by ALK Associates, Inc. in preparing the study presented by Hunt and Oderwald. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

21. Identify and describe the classification of junction types (e.g., run through; through block; daily switching; less than daily switching) that were assigned in the Quantanet Intercarrier Routing Model used in preparation of the study produced by Hunt and Oderwald, including the basis for those classifications (e.g., average daily volume) and the impedances assigned to each classification in the final calibrated routing model. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

22. Identify each new interline junction between BN/Santa Fe and another carrier created as part of the study produced by Hunt and Oderwald. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS

and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

23. For each new interline junction identified in response to the preceding question, identify the junction classification and impedance values assigned in the Quantanet Intercarrier Routing Model as used in the study produced by Hunt and Oderwald. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

24. Identify and describe any differences in impedance assigned to the node or nodes representing the Laredo, Texas gateway with Mexico for traffic interchanged with (a) UP and (b) The Texas Mexican Railway. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

25. State whether ALK Associates, Inc. had completed its calibration of impedances for the Quantanet Intercarrier Routing Model using the 1994 Waybill (other than the ATD Model Recalibration discussed at pages 8 and 9 of the verified statement of Hunt and Oderwald) prior to its retention by Conrail for this proceeding. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

26. Identify all junctions in the waybill sample that were eliminated in the Quantanet Intercarrier Routing Model used in the study presented by Hunt and Oderwald. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

27. Identify all measures used by ALK Associates, Inc. to determine whether the Quantanet Intercarrier Routing Model was unbiased as used in the study presented by Hunt and Oderwald. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

28. Identify and describe all measurements of the quality of the Quantanet Intercarrier Routing Model that were performed in preparation of the study presented by Hunt and Oderwald. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.



29. Identify and describe any comparisons that have been made by ALK Associates, Inc. over the past five years of the impact on traffic flows of a proposed change in the rail network estimated by the "ATD Model" referenced in the verified statement of Hunt and Oderwald and the actual changes in traffic flows that resulted from such change. [CR. KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

30. Identify any screens used by ALK Associates, Inc. as part of its estimation of market shares to eliminate routes that are considered unlikely to attract traffic, including screens applied at the time the origin, origin carrier, termination, termination carrier "quads" are formed for the Quatanet routing model and those applied after routes are generated. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

31. Describe any filtering or other process used by ALK Associates, Inc. to divert traffic from base 1994 routes to new routes after estimates were made of the market share each route is likely to attract. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS

and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

32. Identify all calibrations to the ALK Advanced Traffic Diversion Model ("ATD Model") for each year from 1991 through the present, and produce all documents relating to or setting for the reason(s) for each such calibration. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore incorporates by reference Conrail's response to this interrogatory.

DOCUMENT REQUESTS

33. To the extent not done as part of your prior discovery responses or March 29 filings, produce all presentations to, and minutes of, your board of directors relating to the UP/SP merger or conditions to be sought by you or any other party in this proceeding. [All but govt's, assns.]

RESPONSE: KCS incorporates its response to Request No. 21 contained in KCS-35.

34. To the extent not done as part of your prior discovery responses or March 29 filings, produce all your business plans or strategic plans, if those filings referred to the possible impact of the merger on your future business. [All but govt's, assns]

RESPONSE: KCS incorporates its response to Request No. 23 contained in KCS-35.

38. To the extent not done as part of your prior discovery responses or March 29 filings, if the answer to Interrogatory 21 in applicants' second set is affirmative, produce all documents, including computer tapes, that enable the identification of traffic for which SP is the exclusive serving carrier at the origination or the destination.

RESPONSE: KCS incorporates its response to Interrogatory No. 21 contained in KCS-35, which referred Applicants to responsive disks in the KCS document depository.

39. Produce all geo-coded traffic data from the 1994 Carload Waybill Sample. [CR, KCS]



RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore refers Applicants to Conrail's response to this request.

40. Produce all statistical analyses undertaken in developing the "trackage/haulage" coefficients reference on pages 8 and 9 of the Hunt/Oderwald Verified Statement. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore refers Applicants to Conrail's response to this request.

41. Produce in both a paper output list and in electronic format the uncompiled computer source code and the executable version of the following software:

a. The two most recent versions of the "pre-recalibration" ATD Model, i.e., the code(s) that would have been executed prior to the "recalibration" effort described in the Hunt/Oderwald Verified Statement, including:

(1) All the hard copy and machine-readable input and output files for original runs of the "pre-calibration" program that were used to calibrate it against the 1994 Carload Waybill Sample data, and the coefficients determined from those calibrations.

(2) All the hard copy and machine-readable input and output files for original runs of the "pre-calibration" program that were used by ALK to "test[]" the ATC model against the 1994 ICC

Carload Waybill Sample" as described on page 6 of the Hunt/Oderwald Verified Statement, and the coefficients determined from those calibrations.

(3) All the hard copy and machine-readable input and output files for original runs of the "pre-recalibration" program that indicated the need for recalibration.

(4) All other computer programs, input files, and output files, in both paper and machine-readable form, that were used to explore the sensitivity of the coefficients in the "market share equation" to various strategies of recalibration.

b. The current version of the recalibrated ATD Model, and all intermediate versions of the ATD Model run by ALK to finalize and "tune" the final recalibrated model, including input, output, and program listings, in both paper and machine-readable form, and all machine-readable versions of the input files and output files from these runs.

c. All runs of the recalibrated ATD that form the basis for the opinions expressed by Hunt/Oderwald in their Verified Statement, with these runs specifically identified as such, including input, output, and program listings, in both paper and machine-readable form, and all machine-readable versions of the input files and output files from these runs.

d. The two most recent versions of PC\*Rail

e. The two most recent versions of the Princeton Transportation Network Model and the Graphic Information System ("PTNM/GIS").

f. All programs and files, both input and output, that form the basis of Figures I, Ia, Ib, Ic, Id, II, IIa, IIb, IIc, IIId, in the Hunt/Oderwald Verified Statement. [CR, KCS]

RESPONSE: Pursuant to an agreement between KCS and Conrail, witnesses Hunt and Oderwald's testimony was utilized by both KCS and Conrail. KCS therefore refers Applicants to Conrail's response to this request.

This 10th day of April, 1996.

Alan E. Lubel

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Attorneys for The Kansas City  
Southern Railway Company



CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing "The Kansas City Southern Railway Company's Responses to Applicants' Third set of Interrogatories and Requests for Production of Documents" was served this 10th day of April, 1996, by hand delivery to attorneys for Applicants and by depositing a copy in the United States mail in a properly addressed envelope with adequate postage thereon addressed to the Restricted Service List.

Alan E. Lube  
Attorney for The Kansas City Southern  
Railway Company

STB FD

32760 4-10-96

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Item No. \_\_\_\_\_

Page Count 27  
Apr # 260

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81290

ENTERED Office of the Secretary
APR 11 1996
601 PENNSYLVANIA AVENUE, N.W. SUITE 640 NORTH BUILDING WASHINGTON, D.C. 20540 Public Record TELEPHONE: 202-274-2994 FACSIMILE: 202-274-2994

April 10, 1996

**HAND DELIVERED**

Mr. Vernon A. Williams  
Surface Transportation Board  
Case Control Branch  
Room 2215  
1201 Constitution Avenue, N.W.  
Washington, D.C. 20423



Re: Finance Docket No. 32760, *Union Pacific Corporation, Union Pacific Railroad Company and Missouri Pacific Railroad Company -- Control & Merger -- Southern Pacific Rail Corporation, Southern Pacific Transportation Company, St. Louis Southwestern Railway Company, SPCSL Corp. and the Denver and Rio Grande Western Railroad Company*

Dear Secretary Williams:

Enclosed please find The Kansas City Southern Railway Company's Responses to Applicants' Second Set of Interrogatories and Requests for Production of Documents ("KCS-35") and The Kansas City Southern Railway Company's Responses to Applicants' Third Set of Interrogatories and Requests for Production of Documents ("KCS-37").

Also enclosed is a 3.5 inch diskette containing the text of both KCS-35 and KCS-37.

Sincerely yours,

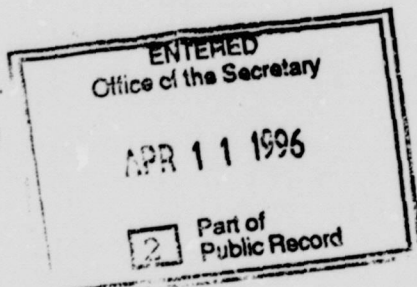
*William A. Mullins*

William A. Mullins

Enclosures

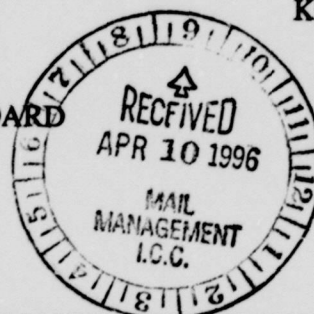
cc: The Honorable Jerome Nelson  
Restricted Service List





KCS-35

BEFORE THE  
SURFACE TRANSPORTATION BOARD



Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY  
-- CONTROL AND MERGER --  
SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY  
COMPANY, SPCSL CORP. AND THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY

THE KANSAS CITY SOUTHERN RAILWAY COMPANY'S RESPONSES TO  
APPLICANTS' SECOND SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS

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Attorneys for The Kansas City Southern  
Railway Company

April 10, 1996

BEFORE THE  
SURFACE TRANSPORTATION BOARD

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Finance Docket No. 32760

UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY  
AND MISSOURI PACIFIC RAILROAD COMPANY  
-- CONTROL AND MERGER --  
SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC  
TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN RAILWAY  
COMPANY, SPCSL CORP. AND THE DENVER AND  
RIO GRANDE WESTERN RAILROAD COMPANY

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THE KANSAS CITY SOUTHERN RAILWAY COMPANY'S RESPONSES TO  
APPLICANTS' SECOND SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS

The Kansas City Southern Railway Company ("KCS") responds to Applicants' Second Set of Interrogatories and Requests for Production of Documents as follows:

KCS reasserts and incorporates by reference, its General Objections to Applicants' discovery requests as set forth in KCS-28, paragraphs 3 through 13. Subject to these objections and to prior rulings by Administrative Law Judge Nelson, KCS responds to Applicants' individual interrogatories as follows:

1. To the extent not done as part of your prior discovery responses or March 29 filings, identify and describe any agreements or understandings that you have with any other party to this proceeding regarding positions or actions to be taken in or otherwise relating to this proceeding, including any "joint defense" or "common interest" agreement, or any confidentiality agreement on which you rely in objecting to discovery requests or invoking an

informers privilege or other privilege. [Routine procedural agreements, such as agreements concerning the order of questioning at depositions or the avoidance of duplicative discovery, need not be identified. If Conrail contends that any aspect of such agreement is privileged, state the parties to, date of, and general subject of the agreement.] [All]

RESPONSE: KCS and Conrail have an oral agreement whereby Conrail agreed to allow KCS to also use Messrs. Hunt and Oderwald as joint witnesses. Further, to the extent KCS opposes the merger or seeks conditions, it has a common interest with other parties who take similar positions.

2. To the extent not done as part of your prior discovery responses or March 29 filings, identify each line segment that you operate or have operated on a directional basis, either entirely or to some degree. For each such line segment, (a) state every significant respect in which your service to any shippers is or was improved by operating directionally, (b) state every significant respect in which your service to any shippers is or was adversely affected by operating directionally, and (c) explain why you operate or operated the line segment directionally. [CR, KCS, T-M]

RESPONSE: No such lines have been identified.

3. To the extent not done as part of your prior discovery responses or March 29 filings, state whether you discriminate or have discriminated against trackage rights tenants in the dispatching and other service that you provide where other railroads operate over your lines. State approximately how often and by whom such allegations have been made? Identify any instances where they were well-founded. [Rrs]



RESPONSE: It is the policy of KCS not to discriminate against trackage rights tenants; however, no policy can establish that such discrimination never occurs. KCS does operate via trackage rights and haulage rights as a tenant and has been the subject of discrimination due to the operational and switching policies of the landlord.

4. To the extent not done as part of your prior discovery responses or March 29 filings, explain why, if you were to purchase SP lines between St. Louis/Memphis and Texas, you believe that you would provide superior service, greater transportation efficiency, or other larger public benefits than would another railroad as purchaser of those lines. [CR, KCS]

RESPONSE: KCS incorporates its response to Interrogatory No. 13 contained in KCS-34. In further response, KCS contends that a third-party purchaser (other than BNSF) could operate this line with greater efficiency and superior service than either UP/SP, with their bi-directional operations, or BNSF, with trackage rights and in the face of UP/SP's southbound operations.

5. To the extent not done as part of your prior discovery responses or March 29 filings, (a) describe any specific proposal you have for line sales or trackage rights in your favor as a condition to the UP/SP merger, (b) state whether you have conducted a market analysis with respect to the proposal, (c) state whether you have prepared an operating plan with respect to the proposal, and (d) state whether you have prepared pro forma financial statements with respect to the proposal. [Rrs]

RESPONSE: KCS incorporates its response to Interrogatory No. 14 contained in KCS-34. In further response, KCS is not asking the STB to grant approval to a specific

carrier to purchase the lines that should be divested or to give approval to a specific carrier to "step into the shoes" of SP with regard to the rights granted SP in Kansas in the BNSF proceeding. Instead, KCS is requesting that such a divestiture and trackage rights be ordered as a condition to the merger, and that a market-supplied solution be provided. Accordingly, KCS has not prepared the information requested.

8. If you contend in your March 29 filing that reduction from 3-to-2 in the number of railroads serving various shippers or markets as a result of the merger is a reason for denying approval, state whether you contend that two Class I railroads would always compete less vigorously than three Class I railroads would in any given market. [All]

RESPONSE: An answer to this interrogatory is difficult if not impossible because of the vague, overbroad and hypothetical nature of the question. Empirical studies indicate that rate levels are lower where three rail carriers serve a market. For a discussion of these studies, see KCS's March 29 filing (KCS-33), specifically including the verified statements of Messrs. MacDonald and White.

9. The testimony of Richard Peterson on behalf of Applicants describes, at pages 172-75, the views of a number of shippers with respect to competition between a merged UP/SP and BNSF. State whether you believe that those shippers are correct or incorrect in the expectations they have expressed in their statements filed in this proceeding concerning the effects of a UP/SP merger on competition and explain the reasons for that answer. [All]

RESPONSE: These shippers are incorrect to the extent they assume BNSF's cost structure will allow BNSF to compete vigorously in all markets. As shown in KCS's March

29 filing (KCS-33), specifically including the verified statements of Messrs. Plaistow, Rees, and Hunt/Oderwald, this assumption is incorrect.

10. If you contend that there are significant investments in improvements of its railroad that SP could or should have made, or can and should make, identify them and describe any rates of return, hurdle rates, or like standards you use for determining whether to invest in improvements in your business. [All but Govts, Assns]

RESPONSE: See KCS's March 29 filing (KCS-33), specifically including the verified statement of Mr. Grocki.

11. If your March 29 filings contend that rate or service competition will or may substantially lessen because the merger will reduce the number of railroads serving various points from 3-to-2 or 2-to-1, (a) identify those points served by you and (i) no railroad or (ii) one other railroad, (b) state whether rates and service at such points is generally competitive, and (c) estimate what proportion of your business (by revenue or volume) is accounted for by movements where you are (i) the only railroad directly serving the origin or destination, and (ii) one of two railroads directly serving the origin or destination. [Rrs]

RESPONSE: KCS objects to this interrogatory in that it does not maintain information in this form and therefore it would entail a special study, involving significant time and expense. Although it is difficult to estimate, conducting this study would require establishing the appropriate data base from which to work, would take at least 3 to 10 days, and would cost from \$15,000 to \$25,000. In addition, Applicants could conduct such a study themselves from information available to them.



Further, even if such a study was performed, it would not provide a relevant answer because in this proceeding KCS is contending that rates will increase from current 3 to 2 or 2 to 1 levels as a result of reducing the number of carriers. Studying KCS's current rates to exclusively served markets or at two carrier markets where KCS is one of the carriers does not reflect the effect upon rates when the number of carriers is reduced from 3 to 2 or from 2 to 1.

12. Identity all shippers who you claim have expressed support for your position in this proceeding in your March 29 filings who are presently served at a point of origin or destination by both UP and SP directly. [All]

RESPONSE: KCS did not file any shipper statements with its March 29th filing; however, many shippers and shipper associations have reached the same conclusions as KCS with respect to the appropriate conditions that should be imposed on this transaction. KCS refers Applicants to these filings for an explanation of the reasons why these shippers or shipper associations reached these conclusions.

17. With respect to the document attached as Exhibit A, (a) state whether it is a true copy of a survey instrument used by Snaveley, King & Associates on your behalf in surveying shippers as to their views about the UP/SP merger ("SKA survey"), (b) identify documents sufficient to show the results of the SKA survey, and (c) explain why the results of the SKA survey were not included as part of your March 29 filings. [KCS]

RESPONSE:

a. Yes.

b. There are no documents.

c. The results of the "survey" were never compiled or aggregated.

21. With respect to the statement of Curtis Grimm (KCS-33 Vol. I at p. 198) that "SP participates in 50% or more of the movements for over \$1 billion of the 3-to-2 traffic," state whether this total included traffic for which SP is the exclusive serving carrier at the origination or the destination, and, if so, identify or provide all documents, including computer tapes, sufficient to identify traffic for which SP is the exclusive serving carrier at the origin or the destination. [KCS]

RESPONSE: The statement referenced is based on KCS's BEA to BEA market definition. Full details supporting the "over \$1 billion" are included in the Grimm workpapers in the KCS document depository. The \$1 billion total may have included traffic for which SP was the exclusive serving carrier at origin or destination, but no attempt was made to identify SP's status at those locations. Documents "sufficient to identify the traffic for which SP is the exclusive serving carrier at the origin or destination" would be more readily available to SP than to KCS.

31. Did you receive any information or estimate from ALK Associates, Inc., relating to changes in traffic flows resulting from the proposed merger of applicants or the BN/Santa Fe Settlement Agreement, prior to the recalibration of market share for the ATD Model discussed in the verified statement of Hunt and Oderwald at pages 8 and 9. [CR, KCS]

RESPONSE: As KCS understands the question, i.e., the extent to which BNSF will capture traffic pursuant to its trackage rights agreement, the answer is no.

### DOCUMENT REQUESTS

1. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents or data relied upon by any person whose verified statement you submitted in your March 29 filings. [All]

RESPONSE: Documents responsive to this request have been placed in the KCS document depository.

2. To the extent not done as part of your prior discovery responses or March 29 filings, produce machine-readable versions, if they exist, of documents or data you submitted as part of your March 29 filings, of documents or data included as work papers, or of documents or data relied upon by persons whose verified statement you submitted in your March 29 filings. [All]

RESPONSE: Machine-readable information currently available to KCS has been furnished to Applicants, and KCS is endeavoring to ascertain whether additional information is in machine-readable form.

3. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, analyses or reports discussing benefits or efficiencies that may result from the UP/SP merger. [All]

RESPONSE: KCS incorporates its response to document request No. 2 contained in KCS-34. Documents responsive to this request have been placed in the KCS document depository.



4. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, analyses or reports discussing potential traffic impacts of the UP/SP merger. [All]

RESPONSE: To the extent such documents exist and are in the possession, custody or control of KCS, they will be produced.

5. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses discussing competitive impacts of the UP/SP merger, including but not limited to effects on the following (a) market shares, (b) source or destination competition, (c) transloading options, or (d) build-in or build-out options. [All]

RESPONSE: KCS incorporates its response to document request No. 4 contained in KCS-34.

6. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing the BN/Santa Fe Settlement Agreement, the IC Settlement Agreement, or the Utah Railway Settlement Agreement. [All]

RESPONSE: KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials, over 20 percent of whose offices would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least

7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel.

7. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing conditions that might be imposed on approval of the UP/SP merger.] [All]

RESPONSE: KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials, over 20 percent of whose offices would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel.

8. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing actual or potential competition between UP and SP. [All]

RESPONSE: KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of

any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials, over 20 percent of whose offices would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel. Subject to these objections, responsive documents have been placed in the KCS document depository.

9. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing competition between single-line and interline rail transportation. [All]

RESPONSE: KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials, over 20 percent of whose offices would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel. Subject to this objection, KCS states that it does not believe that it has any documents responsive to this request.



10. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing the benefits of any prior Class I rail merger or rail mergers generally. [All]

RESPONSE: KCS incorporates its response to Request No. 11 contained in KCS-34. In further response, KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials, the same would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel.

11. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing the financial position or prospects of SP, if those filings discussed that subject. [All]

RESPONSE: KCS incorporates its response to Request No. 12 contained in KCS-34. In further response, KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior

management officials, the same would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel. Subject to this objection, KCS states that it does not believe that it has any documents responsive to this request.

12. To the extent not done as part of your prior discovery responses or March 29 filings, produce all communications with other parties to this proceeding discussing the UP/SP merger or the BN/Santa Fe Settlement Agreement, and all documents relating to such communications. [All]

RESPONSE: Subject to KCS' prior objections, responsive documents have been placed in the KCS document depository.

13. To the extent not done as part of your prior discovery responses or March 29 filings, produce all presentations, solicitation packages, form verified statements, or other materials used to seek support from public officials, or any shipper or other party in this proceeding, for a position being taken or proposed or considered by you or any other party in this proceeding. [All]

RESPONSE: Subject to its objections, responsive documents have been placed in the KCS document depository. Based on the letter of April 6, 1996, from Applicants' counsel, no further response is necessary.

14. To the extent not done as part of your prior discovery responses or March 29 filings, produce all presentations, letters, memoranda, white papers or other documents sent or given to DOJ, DOT, any state Governor's, Attorney General's or Public Utilities Commission's (or similar agency's) office, any other government official, any consultant, any chamber of commerce, or any shipper or trade organization relating to the UP/SP merger. [Even if not producing them, you should identify documents submitted to law enforcement officers under an explicit assurance of confidentiality.] [All]

RESPONSE: Subject to its objections, including its constitutional rights to petition, responsive documents have been placed in the KCS document depository. Based on the letter of April 6, 1996, from Applicants' counsel, no further response is necessary.

15. To the extent not done as part of your prior discovery responses or March 29 filings, produce all notes or memoranda of any meetings with DOJ, DOT, any state Governor's, Attorney General's or Public Utilities Commission's (or similar agency's) office, any other government official, any consultant, any chamber of commerce, or any shipper or trade organization relating to the UP/SP merger. [You should identify but need not produce documents prepared by your counsel.] [All]

RESPONSE: Based on the letter of April 6, 1996, from Applicants' counsel, no further response is necessary.

16. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, analyses or reports discussing or reflecting shipper surveys or interviews concerning the quality of service or competitiveness of any railroad participating in this proceeding. [All]



RESPONSE: KCS adopts Applicants' own position that communications with shippers to solicit support for its position in this proceeding constitutes classic work product, and KCS therefore objects to this request as invading the process of obtaining shipper support statements. KCS has no other shipper surveys.

17. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings discussed such a condition or sale, produce all documents discussing the price to be paid for, or the value of, any UP or SP lines that might be sold pursuant to a condition to approval of, or otherwise in connection with, the UP/SP merger. [All]

RESPONSE: KCS incorporates its response to request No. 18 contained in KCS-34.

18. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents discussing trackage rights compensation for any of the BN/Santa Fe Settlement Agreement Lines, or any other line of UP or SP that you believe should or might be the subject of a proposed trackage rights condition in this proceeding. [All]

RESPONSE: KCS incorporates its response to Request No. 19 contained in KCS-34.

19. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents relating to actual or estimated maintenance-and-operating costs, taxes and return-to-capital costs with respect to any of the BN/Santa Fe Settlement Agreement Lines, or any other line of UP or SP that you believe should or might be the subject of a proposed trackage rights condition in this proceeding. [All]

RESPONSE: See verified statements of J. Plaistow and H.R. Rawert contained in KCS's March 29, 1996 filing (KCS-33) and related work papers.

20. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents relating to any agreement or understanding that is responsive to Interrogatory 1. [All]

RESPONSE: Based on the April 6, 1996 letter from Applicants' counsel, no further response is required.

21. To the extent not done as part of your prior discovery responses or March 29 filings, produce all presentations to, and minutes of, your board of directors relating to the UP/SP merger or conditions to be sought by any other party in this proceeding. [All but govt's, assns.]

RESPONSE: Subject to and without waiving its prior objection that its parent company, Kansas City Southern Industries ("KCSI"), is not a party to this proceeding, minutes of the meetings of KCSI's Board of Directors and the KCSI Executive committee, where the merger was discussed, are being placed in KCS's document depository. Based on the April 6, 1996 letter from Applicants' counsel, no further response is required.

22. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports or analyses discussing trackage rights terms concerning compensation or equal handling, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found. [Rrs]

RESPONSE: KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials, over 20 percent of whose offices would need to be searched. In

addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel. Subject to this objection, KCS knows of no such documents.

23. To the extent not done as part of your prior discovery responses or March 29 filings, produce all your business plans or strategic plans, if those filings referred to the possible impact of the merger on your future business. [All but govt's, assns]

RESPONSE: Not applicable to KCS.

24. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings cite, rely upon, endorse or purport to agree with analyses by any of the following persons, produce all communications with Richard C. Levin, Curtis M. Grimm, James M. MacDonald, Clifford M. Winston, Thomas M. Corsi, Carol A. Evans or Steven Salop concerning econometric analyses of rail pricing, and all documents relating to such communications. [All]

RESPONSE: KCS has no such documents.

25. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings discuss that subject, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing competition for traffic to or from Mexico



(including but not limited to truck competition) or competition among Mexican gateways.

[All]

RESPONSE: KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials, over 20 percent of whose offices would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel. Subject to this objection, KCS incorporates its response to request No. 30 contained in KCS-34. Additional responsive documents are being placed in the KCS document depository.

26. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents sufficient to show your financial support for, establishment of, participation in, or relationship with the "Coalition for Competitive Rail Transportation," which made a March 29 filing denominated CCRT-4. [All]

RESPONSE: Documents responsive to this request have been placed in the KCS document depository. (See Haverty "Dear Transportation Professional" letters, N0000036K--N0000047K and N0000073K--N0000081K.)

29. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings discussed that subject, produce all studies, reports or analyses, found

in the files of officers at the level of Vice President or above, or other files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing competition in freight transportation services for shipments to or from West Coast ports. [All]

RESPONSE: KCS objects to this request as vague and overbroad.

In addition, KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials, over 20 percent of whose offices would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel. In further response, and subject to these objections, KCS is unaware of any such studies relating to the proposed UP/SP merger.

30. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings discussed those subjects, produce all studies, reports or analyses, found in the files of officers at the level of Vice President or above, or other files where such materials would more likely be found, discussing (a) transport pricing or competition for chemicals or petrochemicals (i.e., any STCC 28 or STCC 29 commodity, or such commodities generally), (b) the handling of such commodities by railroads, (c) the handling of such commodities by other modes, (d) storage-in-transit of such commodities, or (e)

source or destination competition, shifting of production or shipments among facilities, modal alternatives or shipper leverage as constraints on rail rates or service for such commodities.

[Rrs, cheins., SPI]

RESPONSE: KCS objects to this request as overbroad. In further response, KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials, over 20 percent of whose offices would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel.

31. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings disagree in any significant way with the description of SP's financial situation in the Application, produce all documents found in the files of officers at the level of Vice President or above, discussing any possible breakup or bankruptcy of SP. [All]

RESPONSE: KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials whose offices would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is



estimated that, at a minimum, such a search would take five to seven days and involve the time of each of the management employees as well as coordination by KCS and its counsel. Subject to these objections, KCS refers Applicants to the statements of Berardino and Grocki and related workpapers. KCS further states that it is unaware of any other responsive documents.

32. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents found in the files of officers at the level of Vice President or above, discussing your reasons for opposing the UP/SP merger or seeking to acquire any portion of SP in connection with the UP/SP merger. [All]

RESPONSE: KCS again refers Applicants to the over sixteen-hundred pages in KCS's March 29 filing, and the documents in the KCS depository.

33. To the extent not done as part of your prior discovery responses or March 29 filing, if those filings address a sale of all or part of SP, produce all documents found in the files of officers at the level of Vice President or above, discussing the value or profitability of SSW. [CR, KCS, NITL]

RESPONSE: KCS repeats and incorporates its prior objections to this request, including the fact that the request is unduly burdensome in light of the marginal relevance of any such KCS documents. As to burden, KCS has thirty vice presidents or senior management officials whose offices would need to be searched. In addition, to search "other files where such materials would more likely be found" would require a company-wide inquiry of many of the 400 to 500 management employees in at least 7 different offices. It is estimated that, at a minimum, such a search would take five to seven days and involve the

time of each of the management employees as well as coordination by KCS and its counsel. Subject to these objections, KCS is unaware of any such documents.

35. To the extent not done as part of your prior discovery responses or March 29 filings, if those filings address your railroad car fleet, produce all studies, reports, analyses or plans found in the files of officers at the level of Vice President or above, discussing expansion, contraction, sizing or leasing of any part or all of your car fleet. [Rrs]

RESPONSE: Not applicable to KCS.

38. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, reports, analyses, or plans discussing all or any part of the SP line between Lewisville, Arkansas, and Houston, Texas. [CR, KCS, NITL]

RESPONSE: KCS is endeavoring to locate any such additional documents, but it's unaware of any.

39. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies or plans discussing capacity or facilities of HBT or PTR A in the Houston area, if those filings discussed those subjects. [Rrs]

RESPONSE: Not applicable to KCS.

40. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents relating to any proposal you made for possible line sales or trackage rights in your favor or for your benefit as a condition to the UP/SP merger, proposal, including but not limited to (a) documents describing the proposal, (b) any market analysis with respect to the proposal, (c) any operating plan with respect to the proposal, and (d) any pro forma financial statements with respect to the proposal. [All]

RESPONSE: KCS incorporates its response to Interrogatory No. 14 contained in KCS-34. In further response, KCS is not asking the STB to grant approval to a specific carrier to purchase the lines that should be divested or to give approval to a specific carrier to "step into the shoes" of SP with regard to the rights granted SP in Kansas in the BNSF proceeding. Instead, KCS is requesting that such a divestiture and trackage rights be ordered as a condition to the merger, and that a market-supplied solution be provided. Accordingly, KCS has not prepared the information requested.

53. To the extent not done as part of your prior discovery responses or March 29 filings, produce all studies, analyses or reports discussing the possibility of a build-in by one of the applicants (or build-out to one of the applicants) at any of your facilities referred to in your March 29 filings. [All]

RESPONSE: Not applicable to KCS.

65. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents, including but not limited to computer runs and studies done by ALK Associates, Inc., relating to possible changes in traffic flows resulting from the proposed merger of applicants or the BN/Santa Fe Settlement Agreement, including without limitation runs and studies performed prior to the recalibration of market share for the ATD Model discussed in the verified statement of Hunt and Oderwald at pages 8 and 9, regardless of whether they were ever printed. [CR, KCS]

RESPONSE: KCS is endeavoring to locate any such documents.

66. To the extent not done as part of your prior discovery responses or March 29 filings, produce all documents relating to the recalibration of market share for the ATD



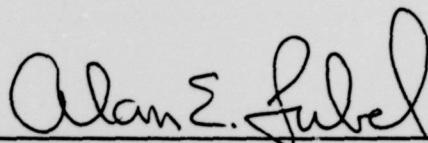
Model discussed in the verified statement of Hunt and Oderwald at pages 8 and 9. [CR, KCS]

RESPONSE: Pursuant to the agreement between KCS and Conrail referenced in KCS's response to Interrogatory No. 1, supra, KCS incorporates Conrail's response to this request.

This 10th day of April, 1996.

Richard P. Bruening  
Robert K. Dreiling  
The Kansas City Southern  
Railway Company  
114 West 11th Street  
Kansas City, Missouri 64105  
Tel: (816) 556-0392  
Fax: (816) 556-0227

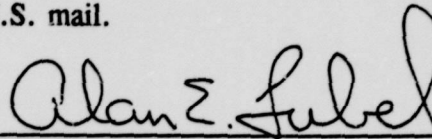
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Attorneys for The Kansas City Southern  
Railway Company

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing "The Kansas City Southern Railway Company's Responses to Applicants' Second Set of Interrogatories and Requests for Production of Documents" was served this 10th day of April, 1996, by hand delivery to Applicants and upon the restricted service list by U.S. mail.

A handwritten signature in cursive script, reading "Alan E. Fubel", written over a horizontal line.

Attorney for The Kansas City Southern  
Railway Company

STB

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# Wyoming State Legislature

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61900



Senate

SENATOR HENRY H. R. "HANK" COE

Senate District 18 - Park County

P.O. Box 1088

Cody, Wyoming 82414

Committees:

Travel, Recreation, Wildlife

and Cultural Resources, Chairman

Education

Management Audit



The Honorable Vernon A. Williams  
Secretary  
Surface Transportation Board  
Twelfth Street and Constitution Avenue, N.W.  
Room 1324  
Washington, DC 20423

RE: Finance Docket No. 32760, Union Pacific Corp., et al  
Control & Merger-Southern Pacific Rail Corp., et al

Dear Secretary Williams:

I am submitting this letter to urge your approval of the above mentioned merger.

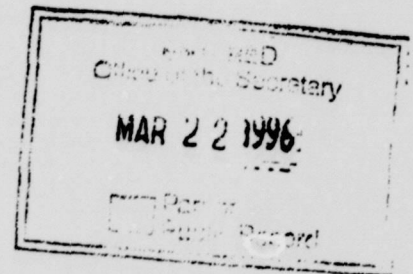
The proposed merger will benefit Wyoming producers and improve our economic growth. Rail competition should be strengthened throughout the Western states making Wyoming products more available to new markets.

I support the proposed merger of Union Pacific and Southern Pacific as an opportunity to enhance economic growth in Wyoming. I respectfully request your prompt approval of the merger.

Sincerely,

Henry H.R. "Hank" Coe

HRC/jp



cc: Dick Hartman  
(Union Pacific Railroad Company  
2424 Pioneer Ave., Ste.301  
Cheyenne, WY 82001)

ADVISE OF ALL  
PROCEEDINGS