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October 29, 2014

236933

Ms. Cynthia Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

ENTERED
Office of Proceedings
October 29, 2014
Part of
Public Record

**Re: STB Ex Parte No. 724 (Sub-No. 3), United States Rail Service Issues—Data
Collection**

Dear Ms. Brown:

Enclosed for electronic filing in the above captioned proceeding is the Weekly Report of BNSF in response to the Board's Order of October 8, 2014. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Jill K. Mulligan". The signature is stylized, with the first letters of the first and last names being capitalized and prominent.

Jill K. Mulligan

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB EX PARTE NO. 724 (Sub-No. 3)

UNITED STATES RAIL SERVICE ISSUES—DATA COLLECTION

**WEEKLY REPORT OF
BNSF RAILWAY COMPANY**

BNSF Railway Company (“BNSF”) provides the following weekly report in response to the Board’s Order of October 8, 2014 in the above referenced sub-docket. The Board’s Order contained requests for reporting that can be grouped into three separate categories: (i) weekly railroad-specific reporting on performance metrics for that railroad’s network; (ii) a weekly overview of the operating conditions in the Chicago gateway including specific metrics regarding Chicago terminal inventories and trains held for delivery to Chicago; and (iii) a report summarizing the current Chicago Transit Coordination Office (CTCO) service contingency protocols, including Alert Levels, with notice of future changes. Covered parties are required to submit weekly reports of data responsive to the Board’s requests, which are described as temporary.

Included with this pleading is an electronic spreadsheet containing BNSF’s weekly submission of data responsive to the first category of data requests in the Order, which cover BNSF-specific network performance measures. A hardcopy of the spreadsheet is also included herein as Attachment A. Information responsive to the second and third categories of requests is being submitted on behalf of BNSF and the other Class I railroads through the AAR in a separate filing that will also be updated according to the schedule contained in the Board’s Order.

As noted in BNSF's October 22, 2014 pleading accompanying the initial report, there are a number of requests in the Board's Order that cover metrics that are not regularly reported by BNSF and, while BNSF has compiled responsive data, we continue to review available data sets and may refine definitions as we gain more familiarity with our data sources. We also noted that because BNSF data reports were built around available BNSF data, and because we have attempted to maintain consistency between the metrics reported to the STB and the metrics that we use internally and in our customer conversations, we expected significant differences between the data reported by BNSF and other railroads, and the initial reports filed on October 22 validated this concern. It was for these reasons that BNSF cautioned against relying on these reports to draw conclusions based on absolute values as opposed to distilling trends over time, or drawing conclusions across the various railroads. We reiterate that caution here.

While our review of data sources and definitions continues, the description of BNSF's approaches used to generate the report provided on October 22, 2014 report remains applicable to this second report, except for a modification made with regards to Requests No. 5 and No. 6. Request No. 5 seeks the weekly number of trains held short of destination or scheduled interchange for longer than six hours sorted by train type and by cause. Request No. 6 seeks the weekly number of loaded and of empty cars in revenue service that have not moved in more than 48 hours and more than 120 hours by commodity type. In our initial report, a single train under Request No. 5, and a single car under Request No. 6 could hit the report multiple times in the same weekly report. For the purposes of this second report, we have been able to apply a filter to the data set used in this report to remove duplicates in the data and to ensure that a car or train is not counted multiple times during the reporting week. We believe that more accurately fits the Board's requests and is more consistent with the approach adopted by a number of the other

reporting railroads. While this is a positive refinement, the remaining limitations noted in our October 22 filing still apply. For Request No. 5, the data still includes trains that hit the report at *any* point on our network, rather than trains that are held “short of destination or scheduled interchange” only. For Requests No. 5 and No. 6, it is still important to keep in mind that just because a train has been held at a point on the BNSF network for more than the period contained in the request does not mean that the shipment will not be delivered in a timely manner or even within the initial service plan. Indeed, many cars or trains are held in terminals and other locations on our network as part of the service design for the movement (e.g., deliveries to facilities with prescribed delivery windows) for the convenience of a shipper (e.g., spacing to allow unloading of coal trains at a utility) or for the receiver (e.g., shortlines serving facilities on branch lines in non-daily service). In addition, a potentially significant numbers of delays not linked to BNSF’s own service performance will be captured as BNSF delays in the data reported in Requests No. 5 and 6, such as issues within a receiver’s facilities or on a connecting carrier’s line.

We also add the following context with regards to Request No. 6. Because this Request seeks data regarding the hold times on loaded and empty cars generally, it will capture cars moving as singles in manifest service as well as cars that are moving in a unit train. We have seen several comments regarding the difference in the number of cars identified as holding for more than 48 hours and more than 120 hours in the crude category and the grain category. The BNSF grain fleet is much larger than the crude fleet, but more importantly, BNSF’s grain fleet has around half the cars deployed in shuttle, or unit train, service with the rest in manifest service. By comparison, the vast majority of crude carloads move in unit trains. Unit trains are built for speed and efficiency, regardless of the commodity involved, with a continuous cycle

between a single origin and destination. Alternatively, manifest service will always have more holding time as cars move across the network into multiple yards along the route to be switched in and out of trains, and ultimately delivered by a local train. Given the large number of single cars made available for grain deliveries, there will always be a higher number of overall cars hitting this holding report for grain when compared to commodities that travel almost exclusively in unit trains. A more informative metric would be the system average train speed for the same period, which will give an overall sense of how trains for different commodities are moving across the network, with actual delay times along the route taken into consideration.

BNSF will continue to update the enclosed spreadsheet on a weekly basis, and will continue to review available data sets and definitions as we gain more familiarity with the data sources relied on for this report. We repeat our earlier caution against drawing firm conclusions based on the absolute values reported in BNSF's report or across the various railroads that are also submitting data. BNSF will also continue to engage frequently and substantively with our customers through direct conversations, and through broader communications and letters, customer forums, meetings and broadcasts to provide real-time information around our service challenges, our short-term and long-term plans to increase network velocity, and our progress against those plans, and to ensure we hear their perspectives and feedback.

Respectfully submitted,



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October 29, 2014

ATTACHMENT A

EP 724 - US RAIL SERVICE ISSUES - DATA COLLECTION

Railroad: BNSF	Year: 2014	Reporting Week:	Date Week Began:	10/19/2014
			Date Week Ended:	10/25/2014

1. System-Average Train Speed by Train Type for the Reporting Week (MPH)

Intermodal	30.7
Grain unit	19.6
Coal unit	17.7
Automotive unit	23.5
Crude oil unit	18.8
Ethanol unit	20.5
Manifest	18.8
All Other	17.1

2. Weekly Average Terminal Dwell Time Measured in Hours Excluding Cars on Run Through Trains

System Average	29.2
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2. Weekly Average Terminal Dwell Time Measured in Hours for 10 Largest Terminals In Terms Of Railcar Capacity

Barstow, CA	45.9
Denver, CO	31.0
Fort Worth, TX	25.0
Galesburg, IL	37.2
Kansas City, KS	36.0
Lincoln, NE	34.4
Memphis, TN	17.1
Northtown, MN	44.5
Pasco, WA	39.7
Tulsa, OK	26.4

3. Total Cars On Line by Car Type for the Reporting Week

Box	12,843
Covered hopper	74,962
Gondola	8,981
Intermodal	16,692
Multilevel (automotive)	7,919
Open hopper	68,142
Tank	59,353
Other	10,871
Total	259,763

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4. Weekly Average Dwell Time at Origin for Unit Train Shipments Measured in Hours	
Grain	16.6
Coal	4.9
Automotive	22.4
Crude Oil	9.5
Ethanol	22.9
All Other Unit Trains	10.0

5. Weekly Total Number of Trains Held Short of Destination or Scheduled Interchange for Longer than 6 Hours by Train Type and Cause							
Train Type	Cause						Total
	Crew	Locomotive power	Track maintenance	Mechanical Issue	Other		
					Number	Briefly Explain Cause	
Intermodal	17	7	5	7	47	Road, Terminal, Other	83
Grain unit	37	10	8		91	Road, Terminal, Other	146
Coal unit	97	5	43	7	157	Road, Terminal, Other	309
Automotive unit	6		7	2	28	Road, Terminal, Other	43
Crude oil unit	9	1	7	1	85	Road, Terminal, Other	103
Ethanol unit					11	Road, Terminal, Other	11
Other unit	26	10	13	3	40	Road, Terminal, Other	92
All other trains	62	43	34	2	279	Road, Terminal, Other	420
Total	254	76	117	22	738	Road, Terminal, Other	1,207

6. Weekly Total Number of Loaded and Empty Cars in Revenue Service That Have Not Moved In:				
	Greater Than 120 Hours		Greater Than 48 but Less than or Equal to 120 Hours	
	Loaded	Empty	Loaded	Empty
Intermodal	103	597	990	2,126
Grain	615	696	3,281	2,380
Coal	279	633	772	856
Crude Oil	141	188	197	606
Ethanol	60	76	1,118	1,131
Automotive	198	149	1,696	888
All Other	1,917	2,625	17,751	18,843

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EP 724 - US RAIL SERVICE ISSUES - DATA COLLECTION

Railroad: BNSF	Year: 2014	Reporting Week:	Date Week Began:	10/19/2014
			Date Week Ended:	10/25/2014

7. Weekly total grain cars loaded and billed, reported by State, aggregated for the following Standard Transportation Commodity Codes (STCCs): 01131 (barley), 01132 (corn), 01133 (oats) 01135 (rye), 01136 (sorghum grains), 01137 (wheat), 01139 (grain, not elsewhere classified), 01144 (soybeans), 01341 (beans, dry), 01342 (peas, dry), and 01343 (cowpeas, lentils, or lupines). "Total grain cars loaded and billed" includes cars in shuttle service; dedicated train service; reservation, lottery, open and other ordering systems; and, private cars. Additionally, please separately report the total cars loaded and billed in shuttle service (or dedicated train service) versus total cars loaded and billed in all other ordering systems, including private cars.

Instruction: Please enter "0" if no data is being reported for a field.

State	Total Grain Cars Loaded and Billed For All Ordering Systems	Total Grain Cars Loaded and Billed For Shuttle / Dedicated Train Service Ordering Systems	Total Grain Cars Loaded and Billed For Ordering Systems Other Than Shuttle / Dedicated Train Service
AL	0		
AR	4		4
AZ	0		
CA	6		6
CO	14		14
CT	0		
DE	0		
FL	0		
GA	0		
IA	13		13
ID	11		11
IL	335	221	114
IN	0		
KS	419	333	86
KY	0		
LA	0		
MA	0		
MD	0		
ME	0		
MI	0		
MN	916	665	251
MO	556	550	6
MS	0		
MT	633	108	525
NC	0		
ND	3,980	2,848	1,132
NE	1,339	1,210	129
NH	0		
NJ	0		
NM	0		
NV	0		
NY	0		
OH	0		
OK	1		1
OR	4		4
PA	0		

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RI	0		
SC	0		
SD	2,186	1,772	414
TN	0		
TX	155	115	40
UT	0		
VA	0		
VT	0		
WA	67		67
WI	10		10
WV	0		
WY	23		23
Total	10,672	7,822	2,850

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EP 724 - US RAIL SERVICE ISSUES - DATA COLLECTION

Railroad: BNSF	Year: 2014	Reporting Week:	Date Week Began: 10/19/2014
			Date Week Ended: 10/25/2014

8. For the aggregated STCCs in item 7, report by State the following: a. running total number of outstanding car orders (a car order equals one car); b. average number of days late for all outstanding car orders; c. total number of new car orders received during the past week; d. total number of car orders filled during the past week; and e. number of orders cancelled, respectively, by shipper and railroad during the past week.

State	a. Running Total Number of Outstanding Car Orders	b. Average Number of Days Late For All Outstanding Grain Car Orders	c. Number of New Car Orders	d. Number of Car Orders Filled	e.1. Number of Orders Canceled By Shipper	e.2. Number of Orders Canceled By Railroad
AL						
AR						
AZ						
CA	4	13.0		7		
CO	25	3.2		13		
CT						
DE						
FL						
GA						
IA			40	13		
ID						
IL	48	4.5	158			
IN						
KS	78	12.3		6		
KY						
LA						
MA						
MD						
ME						
MI						
MN	283	9.8		91		
MO	1	3.0		8		
MS						
MT	649	13.0	64	589		
NC						
ND	3,509	14.0	195	1,127		
NE	291	8.3	101	80		
NH						
NJ						
NM				1		
NV						
NY						
OH						
OK				2		
OR						
PA						
RI						
SC						
SD	724	10.3	192	338		
TN						
TX				15		
UT						
VA						
VT						

ATTACHMENT A

WA	313	8.0	24	144		
WI			110	7		
WV						
WY	25	14.2		23		
TOTAL	5,950	12.5	884	2,464	0	0

ATTACHMENT A**EP 724 - US RAIL SERVICE ISSUES - DATA COLLECTION**

Railroad: BNSF	Year: 2014	Reporting Week:	Date Week Began:	10/19/2014
			Date Week Ended:	10/25/2014

9. Plan vs. Performance For Grain Shuttle (Or Dedicated Grain Train) Round Trips, By Region, Updated To Reflect The Previous Four Weeks

Region (Please Specify Destination Region)	Trip Plan	Trip Performance			
	Oct Plan	10/25/2014	10/18/2014	10/11/2014	10/4/2014
System	2.5	2.3	2.1	2.4	2.3
CA	2.3	2.5	2.0	2.3	2.3
Gulf	2.9	2.4	4.6	2.6	1.6
Mexico	1.7	1.7	1.1	0.7	1.1
PNW	2.5	2.2	2.0	2.3	2.7
West TX	3.6	3.6	4.2	5.7	4.5

10. Average Daily Coal Unit Train Loadings vs. Plan for the Reporting Week By Coal Production Region

Region	Loadings Plan	Loadings Average
Powder River Basin	49.0	49.3
Illinois Basin		
Uinta Basin		
Northern Appalachia		
Central Appalachia		
Southern Appalachia		
Other	3.0	2.6