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November 14, 2014

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

Re: EP 724 (Sub-No. 3), *United States Rail Service Issues – Data Collection*

Dear Ms. Brown:

Pursuant to the decision served in this proceeding on October 8, 2014, the Association of American Railroads, on behalf of its freight railroad member representatives in the Chicago Transportation Coordination Office (CTCO), hereby files the attached general summary of CTCO's contingency protocols.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy J. Strafford", written over a horizontal line.

Timothy J. Strafford
Counsel for the Association
of American Railroads

NARRATIVE SUMMARY OF OPERATING CONDITIONS

General Summary of current CTCO service contingency protocols, including descriptions of Alert Levels

The Chicago Terminal Operating Condition (OPCON) Agreement provides the framework necessary to quickly identify and mitigate, to the degree reasonably practicable, potential and current operating conditions or events that would negatively impact rail traffic moving via the Chicago Gateway. Safety of operations is integral throughout the alert plan processes.

The plan provides for an automated monitoring of terminal, yard, corridor and weather conditions linked to specific levels of volume/activity which could adversely impact terminal operations. These metrics, when exceeding preset levels will require predetermined countermeasures geared to effectively remove a set percentage of cars/trains from the affected location(s) in order to restore fluidity of operations.

Further deterioration of the automatic indicators will require additional, predetermined, focused countermeasures geared to remove an even greater percentage of volumes to expedite a more rapid recovery, while enabling unaffected areas to continue a more normal operation.

Overall Terminal Operating Conditions and Individual Yard, Road or Corridor conditions that impact operations are monitored and categorized separately for purposes of required countermeasures. The Operating Conditions are defined as Green, Yellow and Red. Actions between railroad partners range from a creation of by-pass traffic to specific diversion of Chicago traffic (cars and trains) to other gateways.

CTCO is charged with development, implementation and management of the Chicago Terminal Operating Condition Agreement which includes quick escalation in cases of ineffective or insufficient countermeasures.