

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

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UNITED STATES RAIL SERVICE ISSUES—PERFORMANCE DATA REPORTING

**REVISED METHODOLOGICAL REPORT OF
BNSF RAILWAY COMPANY**

Pursuant to 49 C.F.R. § 1250.1, BNSF Railway Company (“BNSF”) provides the following overview of methodology used to generate the modified weekly reporting implemented by the Board’s November 30, 2016 Order in the above referenced sub-docket. The Final Rule outlined in the Board’s Order and implemented at 49 C.F.R. Part 1250 contained updated requirements for weekly reporting by individual Class I railroads on service performance metrics for that railroad’s network. Covered parties were required to submit their first weekly report of data responsive to the Board’s requests on March 29, 2017.¹ The Final Rule also required that each Class I provide, as an accompaniment to its initial weekly report under the new requirements: (i) an explanation of the methodology for deriving the data contained therein, and (ii) the definition of unit train used for reporting purposes. In July of 2020, BNSF implemented changes to the methodologies used to report Nos. 2 (Terminal Dwell Time) and 6 (Cars Held). Accordingly, BNSF provides the following updated information about the methodology employed to generate the data included with BNSF’s weekly performance data

¹ The Board’s November 30, 2016 Order required that the initial report under the new requirements be submitted on February 8, 2017. In response to the January 20, 2017 Memorandum for the Heads of Executive Departments and Agencies from Reince Priebus, Chief of Staff to President Trump, the Board extended the date for the submission of initial reports to March 29, 2017.

report that submitted to the Office of Public Assistance, Government Affairs and Compliance in the above referenced sub-docket:

- **Data Element No. 1—Train Speed:** Weekly system-average train speed by train type (intermodal, grain unit, coal unit, automotive unit, crude oil unit, ethanol unit, manifest, all system)

Data Element No. 1 reflects data that was historically provided by the Class I railroads through the AAR's public Weekly Performance Reports, available on the AAR website at <http://www.railroadpm.org/>. Average speed is calculated by dividing train-miles by total hours operated, excluding yard and local trains, passenger trains, maintenance of way trains, and terminal time. Consistent with 49 C.F.R. § 1250.2(a)(1), BNSF has included the two additional categories of "Crude oil unit" and "Ethanol unit" that were not separately isolated in the AAR Weekly Performance Report.

- **Data Element No. 2—Terminal Dwell Time:** Weekly average terminal dwell time for the system and ten largest terminals by railcar capacity.

Consistent with 49 C.F.R. § 1250.2(a)(2), terminal dwell in BNSF's STB report has been measured as the average time a car resides at the specified terminal location expressed in hours, beginning with a customer release, received interchange, or train arrival event and ending with customer placement (actual or constructive), delivered or offered in interchange, or train departure event. Effective July 22, 2020, BNSF has expanded the data set reflected in this metric to cover 100% of BNSF terminals compared to historic AAR reporting that was limited to a subset of 38 key stations. BNSF also implemented other enhancements to better reflect the movement of equipment through BNSF terminals, and exclude cars that move through a terminal on a run-through trains, that are bad ordered, or that are maintenance of way cars.

- **Data Element No. 3—Cars Online:** Weekly total cars on line by car type (box, covered hopper, gondola, intermodal, multilevel (automotive), open hopper, tank, other, total)

Data Element No. 3 also reflects data that was historically provided through the AAR's public Weekly Performance Reports. BNSF has populated the new STB spreadsheet with the average of the daily on-line inventory of freight cars. Articulated cars are counted as a single unit, while cars on private tracks (e.g., at a customer's facility) are counted on the last railroad on which they were located. Maintenance of way cars are also excluded.

- **Data Element No. 4—Dwell Time at Origin for Unit Trains:** Weekly average dwell time at origin for loaded unit trains by type (grain, coal, automotive, crude oil, ethanol and all other unit trains)

BNSF has populated the new STB spreadsheet with data extracted from existing internal reports identifying the time between release of a loaded unit train by a customer at origin and the departure of the train from the facility, which is consistent with the Board's definition of dwell time in the Order. The data is sorted by the individual unit train categories identified by the STB; "All Other Unit Trains" includes remaining categories of unit train shipments, including rock, sand, taconite and government unit trains. BNSF has also isolated non-origin interchange dwell and empty units from the weekly reporting.

- **Data Element No. 5—Trains Holding:** Weekly average trains holding per day by train type (intermodal, grain unit, coal unit, automotive unit, crude oil unit, ethanol unit, other unit, and manifest) and by cause (crew, locomotive power and other)

BNSF has populated the new STB spreadsheet with data extracted from a different internal source using the snapshot approach required by 49 C.F.R. § 1250.2(a)(5), e.g., running a daily same-time snapshot of trains held and calculating the daily average for the week by adding up the number of trains holding from each daily snapshot and then divided that number by 7. As BNSF has explained in prior submissions and the Board recognized in its November 30th Order, this Data Element captures trains held at a point on BNSF's network for numerous reasons entirely separate from railroad performance, including trains that are held as part of their routine

operating plan, informed by the needs of shippers, receivers and/or connecting carriers. In addition, BNSF causation flags of “crew,” “locomotive power” and “other” will continue to be applied manually by dispatchers and other operating personnel based on information available to them. As explained in prior submissions, delay on a single train can be the result of several causes, but the dispatcher or operator may not be fully aware of all contributing causes and, in any event, manually selects only a single cause code, which becomes the only cause subsequently reflected in BNSF’s weekly spreadsheet.

- **Data Element No. 6—Cars Held:** Weekly average loaded and empty cars in normal movement and billed to an origin and destination that have not moved in more than 48 hours, by type (intermodal, grain, coal, crude oil, automotive, ethanol, fertilizer, and all other)

BNSF has populated the new STB spreadsheet using the snapshot approach required in 49 C.F.R. § 1250.2(a)(6), by running a daily same-time snapshot of all loaded and empty cars being used in commercial service (excluding cars that have been placed in storage, constructively placed or bad ordered, and cars being used in railroad service such as ballast and other maintenance of way trains) and calculating the daily average for the week. In populating the fertilizer metric, BNSF has used the following fifteen fertilizer Standard Transportation Commodity Codes (STCCs), which includes the STCC added in the Board’s March 7, 2017 decision: 2871236, 2871235, 2871238, 2819454, 2812534, 2818426, 2819815, 2818170, 2871315, 2818142, 2818146, 2871244, 2819173, 2871313, and 2871451). Consistent with the STB’s May 14, 2020 decision in this docket, effective July 22, 2020, BNSF has added chemical and plastics (STCC 28, except fertilizer) as a distinct reporting category. As in prior reporting for this metric, cars have been counted by reference to the underlying rail equipment without accounting for how many individual units may be carried on a single piece of rail equipment. As with Data

Element No. 5, BNSF has calculated the daily average for the week by adding up the number of qualifying cars holding from each daily snapshot and then divided that number by 7. It should also be noted that just because a car has been held at a point on the BNSF network for more than 48 hours does not mean that the car will not be delivered in a timely manner or even within the initial service plan—many cars are held in terminals and other locations on our network as part of the service design for the movement or for the convenience of a shipper or receiver. As with Data Element No. 5, potentially significant numbers of delays that are not linked to BNSF’s own service performance will be captured as BNSF delays in the data reported pursuant to 49 C.F.R. § 1250.2(a)(6).

- **Data Element No. 7—Grain Cars Loaded and Billed:** Weekly total number of grain cars loaded and billed, reported by State, aggregated for identified grain STCCs, identifying totals in shuttle service versus total cars loaded in all other ordering systems

As in prior weekly reporting, BNSF has populated the STB spreadsheet with total loaded and billed cars for the STB Grain Commodities by state in a manner consistent with the way BNSF reports number of cars loaded in the CS54 data submitted weekly to the AAR for public reporting. Total loaded and billed cars includes cars in shuttle service, dedicated train service, reservation, lottery, open and other ordering systems, and private cars with active waybills.

- **Data Element No. 8—Grain Cars Orders:** Weekly and by state, for railroad-owned and leased cars: (a) running total of car orders placed; (b) running total of orders filled; (c) for unfilled orders, number of orders that are 1-10 days past due and 11+ days past due, as measured for when the car was due for placement under the railroad’s governing tariff

BNSF has collected the data responsive to 49 C.F.R. § 1250.2(a)(8) in a manner consistent with our prior reporting and our communications to our customers. To identify the running total of orders placed, we report the total number of new car orders placed during the week-long reporting period. The running total of orders filled is the number of that have been

placed for loading over the seven day period. As previously explained, under BNSF's governing tariffs, a pending car order is classified as past due when the shipment is more than three days past the shipper's want date (hereinafter, the "conversion date"). Any order with a want date that is more than three days old is considered a "Past Due" and any shipment that is Past Due on the Sunday during the current reporting period is allocated either into the 1-10 Day column or the 11+ Day column, depending on its age. As with our prior report, past due orders originating in Canada are excluded.

- **Data Element No. 9—Coal Loadings:** Weekly average coal unit train or car loadings versus plan for the week by coal production region

While 49 C.F.R. § 1250.2(a)(9) provides the option of moving from train counts to car counts, BNSF continues to populate the STB spreadsheet with the average daily loadings for the week of coal unit *trains* for the covered week out of the Powder River Basin (PRB). BNSF has maintained an "Other" category to capture actual train loadings in North Dakota and New Mexico. BNSF has also provided a target for average daily loadings for the week for the same period for the PRB and for "Other."

- **Data Element No. 10—Shuttle Turns:** Average grain shuttle turns per month for system and by region versus the plan.

BNSF will continue to provide shuttle trips-per-month (TPM) figures for the overall system and for the five destination regions as reported to our customers, but on a monthly basis covering the prior previous calendar month. BNSF's first report under 49 C.F.R. § 1250.2(a)(10) will be included in the weekly report to be filed April 5, 2017.

- **Data Element No. 11—Originated Carloads by Commodity Group:** Weekly carloads originated and received in interchange for 23 commodity groups

BNSF has populated the STB spreadsheet with total weekly carloads originated and total weekly carloads received in interchange in a manner consistent with BNSF historic reporting to

the AAR for the weekly CS54 data, and covering the twenty-two historical commodity categories contained therein (11.i). In addition, BNSF has included a separate report (11.ii) of fertilizer cars originated and received for the fifteen STCCs identified by the Board. Consistent with the Board's Order, BNSF has not modified the data in the existing 22 categories to isolate fertilizer shipments covered by the standalone fertilizer metric; accordingly, fertilizer shipments may show up in both metric 11.i and 11.ii in the same weekly report.

- **Definition of Unit Train:** BNSF has maintained in the new STB spreadsheet our historic train-symbol approach to identifying unit trains, which is used consistently in our company communications and tools used by our customers, the formal reporting we have been providing the Board since the October 8, 2014 decision implementing temporary reporting requirements, and the informal reporting we provided before that. To provide unit train specific metrics across the various STB reporting requirements, BNSF identifies unit trains by specific train symbols that reflect the specific service offerings available to our customers. For example, coal unit trains are identified by the letter at the start of the train symbol—C for loaded unit trains and E for empty unit trains. BNSF does not include intermodal trains in unit train reporting.

- **Reporting Week and Timing:** The Final Rule defines the reporting week as 12:01AM Saturday to 11:59PM Friday for Data Element Nos. 1 through 9 with data being presented in the report due the following Wednesday. For Data Element No. 11, the data is also included in the weekly Wednesday report, but is measured from 12:01AM Sunday to 11:59PM Saturday. The monthly data required by Data Element No. 10 is to be submitted on the first weekly report of each month, covering the previous calendar month. BNSF notes there will occasions where, because of how the reporting day falls in relation to the end of the prior month, BNSF will not be

in a position to report the monthly data until the second report in a month because of a lag in obtaining the complete data set after the month's close.

Conclusion

Consistent with the Board's Final Rule, BNSF will discontinue other weekly service performance reports to the STB and will provide the weekly report outlined in 49 C.F.R. Part 1250 on an ongoing basis according to the methodology described here. BNSF will also provide an update to the Board in the event that BNSF changes the methodology used to generate the weekly report or changes the definition used to identify unit train traffic.

Respectfully submitted,



Jill K. Mulligan
BNSF RAILWAY COMPANY
2500 Lou Menk Drive
Fort Worth, Texas 76131

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