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Senior Vice President, Policy & Economics

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Dr. William Brennan
Director, Office of Economics
Surface Transportation Board
395 E St., SW
Washington, DC 20423

Dear Dr. Brennan:

The Association of American Railroads (AAR) hereby requests permission from the Surface Transportation Board (STB) to use portions of the 1972 through 2019 Waybill Samples. This request is an extension of Waybill Request WB20-22, which will expire on June 30, 2021. The Waybill Sample will be used for the following applications:

1. Quantification of data in matters of regulatory economics, including, but not limited to: (a) alternate methods of productivity quantification, (b) studies for exemption of certain rail commodities or services, (c) measurement of the amount of traffic interlined or rebilled, (d) traffic flows to, from, or through certain states or other politically or economically defined areas, (e) line capacity and traffic projection studies, (f) rate regulation and other STB rulemakings, (g) measurement of the amount of traffic affected by safety regulations, and (h) measurement of the amount of traffic subject to economic regulation, as quantified by revenue to variable cost ratios and other indicators.
2. Econometric models, used to measure the rail industry-wide impact on the railroad industry as a whole, from events such as a recession, a railroad strike, a major change in truck and/or rail costs or a change in state and federal policy proposals such as changes in international trade or tariff policies.
3. Freight car utilization analyses designed to estimate equipment supply and demand characteristics and provide input data to mathematical models which simulate optimal distribution patterns and assist with pooling and other fleet decisions.
4. Measurement of hazardous material movements by commodity, car type, geographic factors, and other criteria.
5. Railroad industry data base studies, including, but not limited to: (a) obsolescence studies for the Industry Reference Files, (b) investigations of the proper use and interpretation of the Waybill Sample itself, and (c) benchmarking other railroad databases.

In addition, the AAR is requesting permission for three of our contractors to use the 1972 through 2019 Waybill Samples:

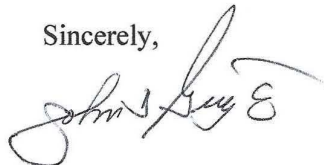
1. Dr. Christopher Barkan of the University of Illinois is conducting research on behalf of the AAR, its member railroads, and the RSI-AAR Railroad Tank Car Safety Research & Test Project. Dr. Barkan is also conducting research for AAR and its member railroads on rail capacity modeling, planning and analysis. Dr. Barkan will use the Waybill as input for the following applications:
 - a. Assessment of product-specific routing patterns necessary for exposure analysis needed for environmental and human health risk analyses.
 - b. Analysis of product-specific tank car and shipment distances to quantify exposure.
 - c. Statistical comparisons to assess the accuracy of other information sources.
 - d. Analysis of traffic movement patterns in conjunction with and to verify capacity modeling techniques.
2. Dr. Gerard McCullough of Northface Associates needs Waybill permission for rail-truck diversion analysis and development of rail elasticity measures.
3. Dr. Mark Burton of the University of Tennessee, Knoxville, needs waybill permission to conduct analysis of market related decision making in the rail industry, the changing composition of rail traffic, traffic flow analysis, impact on the rail industry resulting from changes in regulation or technology of rail competitors and the relationship of these issues to economic regulatory policy.

Varying numbers and combinations of Waybill Sample fields will be required for the various applications enumerated above. As always, the AAR will respect the confidentiality of the Waybill Sample and agrees to observe the STB conditions including:

1. The "raw" Waybill Sample data shall be made available only to those AAR employees who have a need for the data in conducting approved studies requiring the use of Waybill data.
2. The Waybill Sample data shall be used solely for the purposes requested.
3. None of the Waybill Sample data, or results generated from analyses thereof, will be released to the public unless the data are aggregated so that they contain at least three FSACs.

If any questions arise concerning this request, please contact me at your convenience. Per 49 CFR 1244.9, an original and two copies of this request are enclosed. Per the list of charges in 49 CFR 1002.2. I am attaching a receipt for \$694 (the \$450 fixed portion, plus \$61 each for the AAR and the three consultants) from pay.gov for payment of the filing fee.

Sincerely,



John T. Gray

cc: Rapik Saat, AAR