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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Ex Parte No. 767

FIRST-MILE / LAST-MILE SERVICE

COMMENTS OF CSX TRANSPORTATION, INC.

CSX Transportation, Inc. ("CSXT") appreciates the opportunity to provide information about first mile/last mile service in response to the Board's request for comment in the above-captioned proceeding. The Board's decision invites comments on a variety of issues relating to first mile/last mile service and metrics, some of which appear directed to shippers and shipper organizations while others appear directed to rail carriers. The Board's decision specifically seeks comment from rail carriers on data relevant to first mile/last mile service. In these comments, CSXT responds to the Board's inquiry by providing an overview of the many tools it has made available to customers for service visibility and supply chain management. CSXT also joins in the comments of the AAR.

CSXT is focused on providing high quality transportation service and customer service. The ability to provide such service is critical to CSXT's ability to compete with other transportation providers and to its overall success. CSXT's software platform, ShipCSX, is recognized as best in class, and CSXT continues to invest to upgrade and improve the tools within it. As described below, ShipCSX provides shippers with extensive information allowing them to monitor their

service throughout the movement, including first mile/last mile service. CSXT believes that this type of detailed, customer-specific information is most useful to its customers' ability to conduct business and monitor their service levels, and that today's marketplace and competitive incentives already encourage railroads to provide customer-centric informational tools that make rail an increasingly attractive option. One-size-fits-all regulation in this area is unnecessary and could be detrimental to further innovation as railroads compete to win customers and work to establish tools that are the right fit for their customers.

I. ShipCSX has a number of tools to help customers manage their supply chains and that provide visibility into first mile/last mile service

CSXT is a leader in delivering online tools to its customers through its sophisticated software platform, ShipCSX. One of the top priorities for CSXT's customers is supply chain visibility, and in that regard CSXT has developed numerous innovative tools within ShipCSX to communicate with customers and help them manage their supply chains. Last year, CSXT embarked on a multi-year effort to upgrade and rebuild the ShipCSX platform with user-friendly tools and faster quotes, and additional features continue to be rolled out to customers. As it has in the past, CSXT continues to partner with its customers in developing tools and holds customer workshops where it provides training and gathers customer feedback.

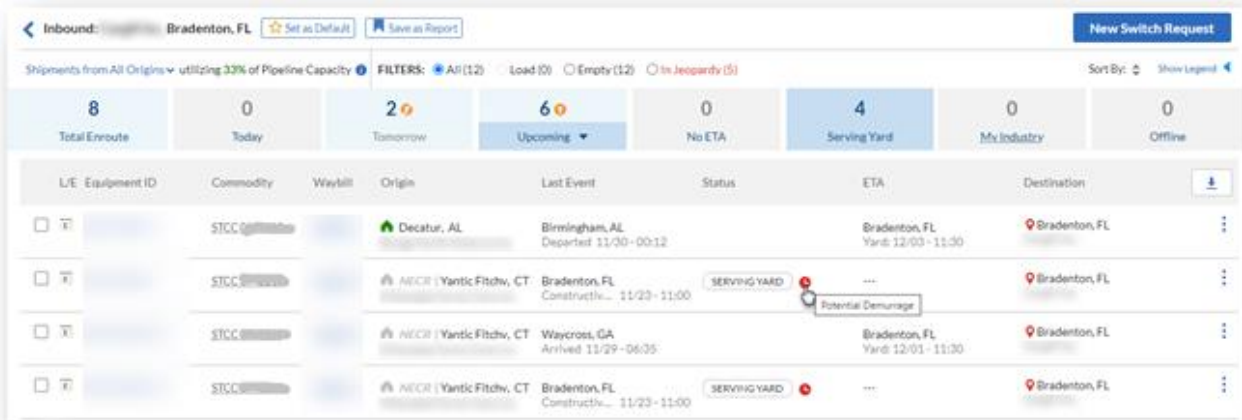
An entire section of the ShipCSX platform is devoted to tools to help customers track and trace their shipments. These tools allow customers to: (i) trace their shipments by equipment ID and location, (ii) view expected inbound and

outbound shipments, (iii) view the history and details associated with a shipment, including last event, (iv) view pipeline capacity, and (v) request actions (such as placement, switching, diversions, etc.). ShipCSX also has tools allowing customers to: (i) easily view, dispute, and pay invoices, (ii) expedite customer service complaint filing and handling, (iii) view bills of lading and provide shipping instructions, and (iv) make price inquiries and lookups, among others. The Trip Plan Performance module (discussed below) provides additional transparency. And in addition to all of these tools available within the platform, ShipCSX also notifies customers directly in a number of circumstances, including pipeline alerts, estimated arrival at customer notifications, and work order and work order exception notifications.

The screenshots below illustrate the kind of information and tools that ShipCSX provides to customers. For example, Figure 1 shows the information and tools available to customers when they choose to trace their shipments by location.¹ Customers are able to view detailed information through this tool. They are able to: (i) filter by loaded, empty, not available, and those in jeopardy of accruing charges, (ii) view total equipment that is en route with details on when the equipment is expected, (iii) view the last event relative to each equipment ID, and (iv) request actions.

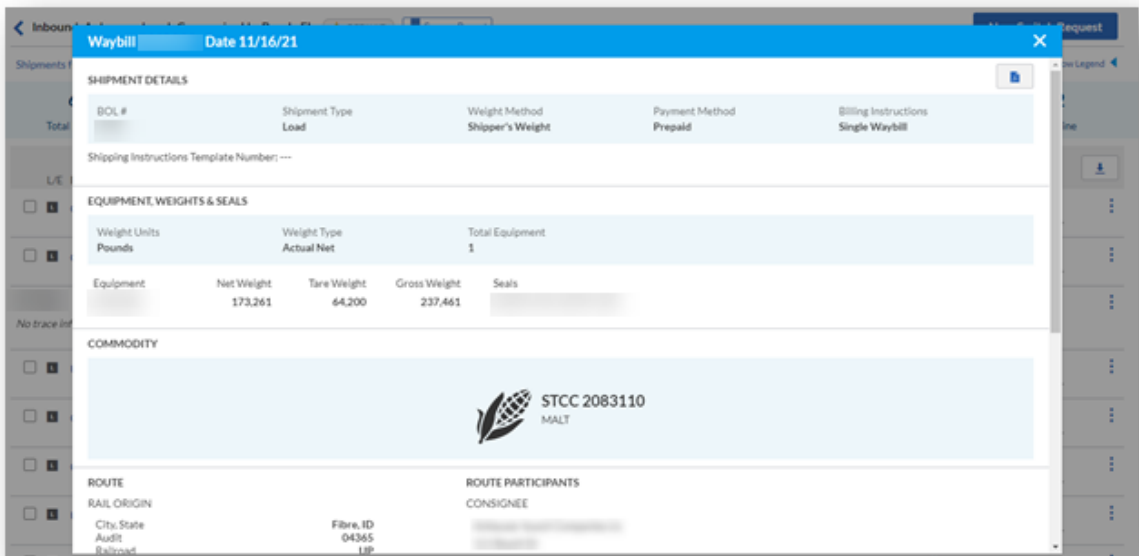
¹ The screenshots provided in Figures 1-5 have been redacted to remove any identifying customer data.

Figure 1 – Track and Trace Overview



Customers are also able to access shipment details by selecting the waybill number. As shown in Figure 2, this allows customers to view the route, route participants, and bill of lading and waybill information per shipment, among other details.

Figure 2 – Track and Trace Waybill Detail



ShipCSX also notifies customers directly in a number of circumstances.

Figure 3 shows an example of a work order notification and the information it provides, including work that is planned and plant capacity.

Figure 3 – Work Order Notification

					
Work Order Notice: 4851412203					
Work Order: WO357470 Rev: 00 11/29/2021 04:03 Train ID: Y19629 Departure: 11/29/2021 07:54					
Inventory Details					
Plant Capacity			Plant Characteristics		
Plant Capacity = 9 Available Plant Capacity = 8 Inventory Summary: Industry = <u>11</u> Yard = <u>1</u> En Route = <u>5</u>			Days of Service: Mo We Fr Your location is "open gate" for all traffic. Definitions: - "Open gate" traffic will be placed directly at your location upon arrival. - "Closed gate" traffic will be constructively placed and requires a placement request to be spotted.		
Switch Summary					
Customer Switch Request			Work Order Summary		
	<u>Loads</u>	<u>Empties</u>		<u>Loads</u>	<u>Empties</u>
Places	0	0	Places	1	0
Pulls	0	1	Pulls	0	1
IntraPlants	0	0	IntraPlants	0	0
Off Spot	0	0	Off Spot	0	0
Work Order: WO357470 Rev: 00 11/29/2021 04:03					
Instruction	Equipment	L/E	Car Type	STCC	Description
PLACE TO INDUSTRY		L	C114	2046715	CORN GERM OR CORN OIL
PULL FROM INDUSTRY		E	C113	0113215	CORN (NOT POPCORN) OR
(*) Denotes car has been added to the Work Order.					

ShipCSX also includes a Trip Plan Performance module. Launched in late 2019, Trip Plan Performance measures success in meeting end-to-end customer

commitments based on the planned estimated time of arrival. CSXT believes it remains the only rail carrier (Class I or otherwise) providing customers with this level of transparency into delivery performance. Trip Plan Performance provides customers with information on how well CSXT is complying with the trip schedules it generates for each container, trailer, and carload shipped by CSXT at the system, location, and lane level. Trip Plan Performance provides unparalleled transparency to customers about service performance. For example, Figure 4 shows the type of performance reports available through Trip Plan Performance. Data is viewable in 30, 60, and 90 day periods and provides information for total shipments and shipments by receiver locations.

Figure 4 – Trip Plan Performance Report

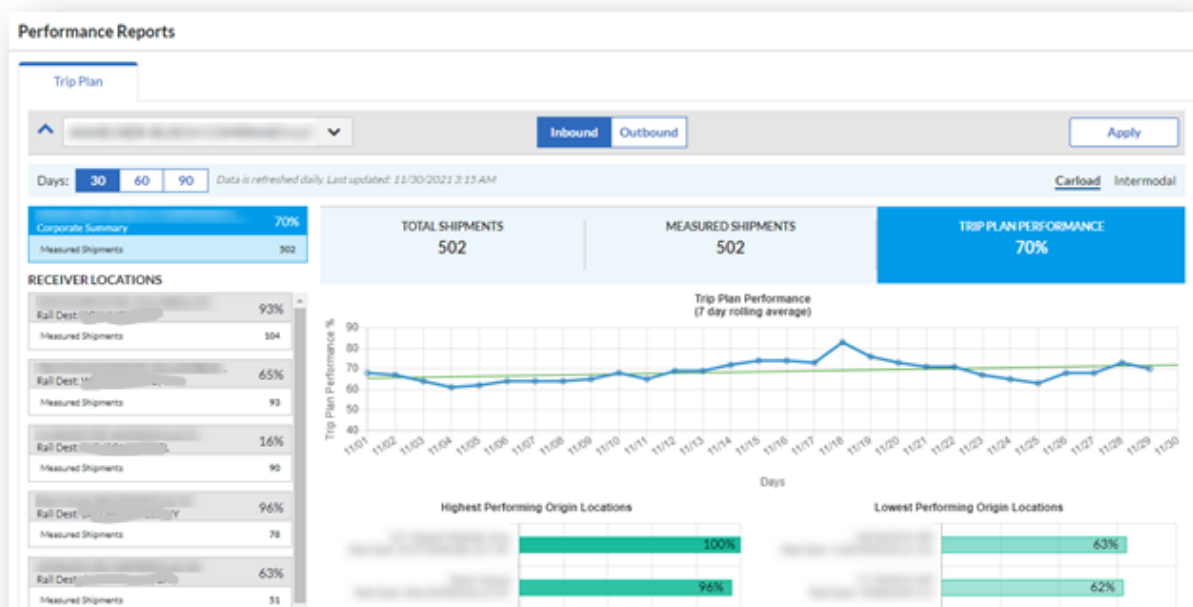
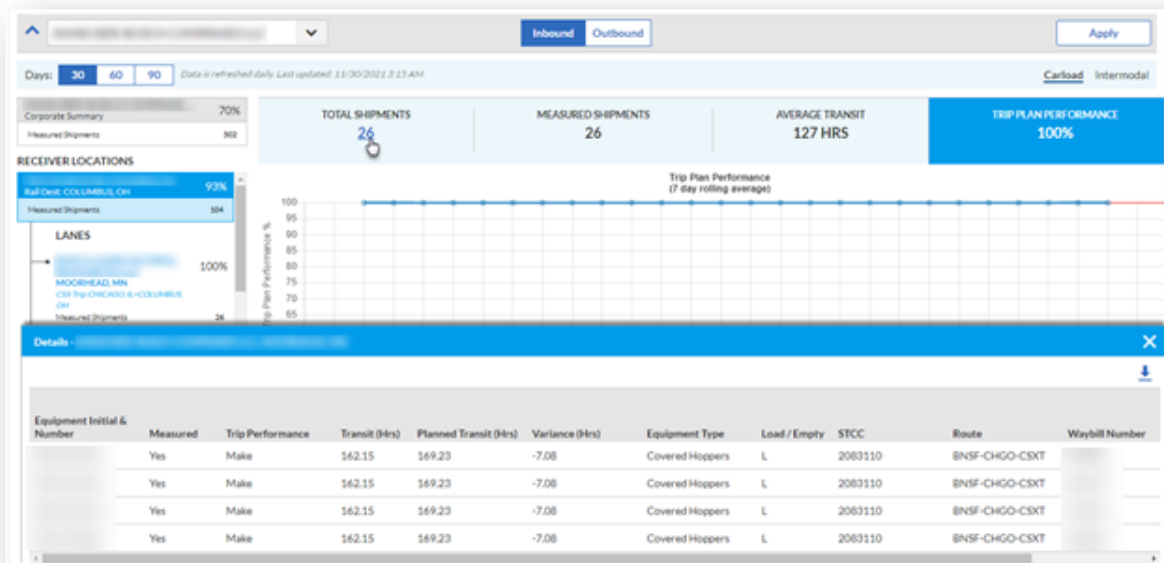


Figure 5 shows the additional level of detail available for each shipment, including the variance between planned transit time and actual transit time.

Figure 5 – Trip Plan Performance Report (Shipment Detail)



Taken together, these tools provide customers with extensive information specific to their facilities and visibility into their service, including first mile/last mile service. CSXT continues to explore and develop tools to provide information and transparency related to CSXT's local service. CSXT provided a tutorial of some recent enhanced features to the Board's Office of Public Assistance, Governmental Affairs, and Compliance earlier this year, and would be pleased to provide a similar demonstration of ShipCSX's features to the Board. Customer service and the provision of service information is one of the many areas in which CSXT competes with other railroads and other modes of transportation. CSXT is committed to continued exploration of ways to enhance its customer tools.

II. Customer-specific information is more useful than aggregated metrics

As discussed above, CSXT provides up-to-date customer-specific information related to first mile/last mile service directly to the customer in a convenient online platform and through direct notifications to customers. That information, provided for each location or railcar individually, is the best source of real time performance data.

Some parties have advocated that the Board adopt some form of aggregated data reporting for first mile/last-mile service, and the Board has appropriately asked those parties to submit more concrete proposals in this proceeding. First mile/last mile service poses many complexities that make it challenging to develop an aggregated data reporting metric that would be a reliable signal of railroad performance. First mile/last-mile performance is often impacted by the actions of others in the supply chain and events outside a railroad's control. And developing a meaningful across-the-board measure is difficult because of variations in customer requirements, such as whether a facility is open or closed, and the different characteristics of merchandise, intermodal, and unit train services. CSXT will review the opening comments with care, and expects to comment on any new reporting proposals in Reply.

III. Conclusion

CSXT appreciates the Board's desire to gain fuller insight into first mile/last mile service, but does not believe that regulation in this area is necessary. CSXT is already providing detailed pipeline management information to its customers and

continues to work with customers to develop new and useful tools. This focus on providing high quality customer service is critical to CSXT's ability to compete, and the Board should allow these market processes to work. CSXT looks forward to reviewing the opening comments from other parties and to addressing those comments on reply.

John P. Patelli
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Respectfully submitted,

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