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April 25, 2022
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April 25, 2022

VIA ELECTRONIC FILING

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

Re: Petition for Leave to File Out of Time and Comments of The Commuter Rail Division
of the Regional Transportation Authority d/b/a Metra in *Wisconsin Central, LTD.*
Interchange with Soo Line Railroad Company, STB Docket No. FD 36397

Dear Ms. Brown:

On behalf of the Commuter Rail Division of the Regional Transportation Authority d/b/a Metra ("Metra"), please find the attached Petition for Leave to File Out of Time and Comments of The Commuter Rail Division of the Regional Transportation Authority d/b/a Metra. If you have any questions regarding this filing, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Charles A. Spitulnik', followed by the printed name 'Charles A. Spitulnik' in a black serif font.

Charles A. Spitulnik

Enclosure

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Finance Docket No. 36397

**WISCONSIN CENTRAL, LTD. INTERCHANGE WITH SOO LINE RAILROAD
COMPANY**

PETITION FOR LEAVE TO FILE COMMENT OUT OF TIME

Communications with respect to this pleading
should be addressed to:

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*Counsel for the Commuter Rail Division of the
Regional Transportation Authority d/b/a Metra*

Dated: April 25, 2022

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Finance Docket No. 36397

**WISCONSIN CENTRAL, LTD. INTERCHANGE WITH SOO LINE RAILROAD
COMPANY**

PETITION FOR LEAVE TO FILE COMMENT OUT OF TIME

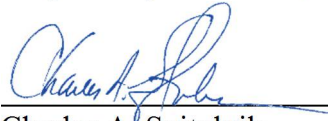
The Commuter Rail Division of the Regional Transportation Authority d/b/a Metra (“Metra”) hereby files this Petition for Leave to File Comment Out of Time with respect to the interchange dispute between Wisconsin Central, Ltd. (“WC”) and Soo Line Railroad Company (“Soo”). Metra respectfully requests that the Surface Transportation Board allow Metra to file the attached Comment in the above-named proceeding.

First, the Board has not yet established a procedural schedule for the submission of evidence or legal argument in this proceeding. Metra seeks leave to file this Comment at this time to the extent that it may be perceived by this Board and the parties as a reply to other pleadings that have been filed since the matter was remanded to the Board by the U.S. Court of Appeals for the Seventh Circuit on December 8, 2021, *Wisconsin Central Ltd. v. STB*, 20 F.4th 292 (7th Cir. 2021).

The attached Comment does not attempt to expand the scope of this proceeding, nor does it raise novel arguments or theories of law. It presents additional evidence related to the impact of the switching arrangements at issue here, and provides important context that Metra believes

the Board will find helpful in making a decision regarding the question of “reasonableness” as it is applied to 49 U.S.C. § 10742.

Respectfully submitted,



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Dated: April 25, 2022

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Finance Docket No. 36397

**WISCONSIN CENTRAL, LTD. INTERCHANGE WITH SOO LINE RAILROAD
COMPANY**

**COMMENTS OF
THE COMMUTER RAIL DIVISION OF
THE REGIONAL TRANSPORTATION AUTHORITY D/B/A/ METRA**

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*Counsel for the Commuter Rail Division of the
Regional Transportation Authority d/b/a Metra*

Dated: April 25, 2022

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Finance Docket No. 36397

**WISCONSIN CENTRAL, LTD. INTERCHANGE WITH SOO LINE RAILROAD
COMPANY**

**COMMENTS OF
THE COMMUTER RAIL DIVISION OF
THE REGIONAL TRANSPORTATION AUTHORITY D/B/A/ METRA**

I. Introduction

The Commuter Rail Division of the Regional Transportation Authority d/b/a Metra (“Metra”) hereby files these Comments with respect to the interchange dispute between Wisconsin Central, Ltd. (“WC”) and Soo Line Railroad Company (“Soo”).¹ For the reasons set forth in this Comment, Metra strongly prefers that the WC-Soo interchange occur at Clearing Yard. Metra’s preference is driven primarily by the fact that interchange at Spaulding has and will continue to cause significant delays to commuter operations along the Milwaukee District West (“MD-W”) line.

II. Background/Procedural History

This dispute was remanded by the U.S. Court of Appeals for the Seventh Circuit on December 8, 2021 in *Wisconsin Central, Ltd. v. STB*, 20 F.4th 292 (7th Cir. 2021). Following that remand decision, WC filed a Post-Remand Brief on February 2, 2022, and on February 14, 2022, Soo submitted a letter to the Board requesting that the Board to strike the WC brief,

¹ Metra is today filing a Motion for Leave to File these Comments out of time and is submitting the Comments together with that Motion in anticipation of a favorable ruling on it.

establish the questions to be addressed in post-remand, and establish a procedural schedule. On February 22, 2022, Metra filed its Reply to Post-Remand Brief of Wisconsin Central, Ltd. and Correspondence from Soo Line Railroad Company, which Metra subsequently withdrew by correspondence dated February 24, 2022. Such correspondence further stated Metra's preference that the interchange occur at the Belt Railway Company of Chicago's ("BRC") Clearing Yard and clarified that Metra is otherwise taking no position as to the merits of the issues remaining to be resolved following remand.

III. Factual Background

Metra's commuter operations on the MD-W Line were negatively impacted by the freight railroads' conduct of interchange of traffic at Spaulding in the past.² Currently, Metra operates 38 commuter trains per weekday along the MD-W line. Additionally, it operates 24 trains on Saturday, and 18 on Sunday.³ Before the COVID-19 pandemic decreased demand for commuter service, Metra operated 54 trains per weekday.⁴ Canadian Pacific Railroad ("CP") currently operates 16 freight trains per day on the line through its subsidiary, Soo.⁵ While Metra owns the MD-W line and operates far more commuter trains over it, CP retains operational and dispatching authority over the line.⁶

As detailed below, the harms Metra has and would suffer as a result of the two freight railroads conducting their interchange of traffic at Spaulding include operational delays, safety issues, and maintenance impacts. Ultimately, such issues are likely to decrease ridership not just on the MD-W line, but across the entire Metra system.

² See VS Oppenheim at p. 3, para. 12-14

³ VS Oppenheim at p. 2, para. 8

⁴ *Id.*

⁵ *Canadian Pacific Railway Limited, et al. – Control – Kansas City Southern, The Kansas City Southern Railway Company, et al.*, STB FD 36500, Railroad Control Application, (filed October 29, 2021), at p. 2-364.

⁶ See VS Oppenheim at p. 3, para. 11

The Verified Statement of Richard Oppenheim attached hereto as Exhibit A, refers to a log that was kept by Metra as a representative sample of the delays suffered by Metra as a result of interchange at Spaulding. *See* Verified statement of Richard Oppenheim, attached hereto as Exhibit A (VS Oppenheim). The log of delays that is attached as Attachment 2 to VS Oppenheim (“VS Oppenheim, Exh. A, Att. 2”) was created and kept as an attempt by Metra to encourage Soo/CP to conduct interchange operations at times when Metra was not operating, or in the alternative, to construct a control point at Bartlett, which would have helped to alleviate the delays caused by the interchange traffic.⁷ The delays captured in the log are directly related to the interchange traffic at Spaulding and range from five minutes to over 30 minutes.⁸ In an effort to mitigate the negative effects of the Spaulding interchange, Metra sought to coordinate with Soo to handle interchange traffic at night when Metra was not operating. However, Soo was inconsistent in its implementation and Metra’s resulting harm continued until interchange operations were moved to BRC’s Clearing Yard in August 2011.⁹

The only relief from this repeated interference with commuter traffic was in August of 2011 when the interchange point was moved from Spaulding to Clearing Yard. After that, the amount of freight traffic on the MD-W line decreased significantly. In addition, Metra has not experienced delays caused by interchange traffic at Clearing Yard since the interchange was moved.¹⁰

In many instances, while interchange activities were taking place at Spaulding, Metra traffic could only use the #1 Main track between the Tower B35 and Roselle West Control Points. This would put eastward Metra trains (inbound toward Chicago) on the opposite

⁷ VS Oppenheim at p. 3, para. 12

⁸ This is not a complete log of all delays experienced between September 2010 and June 2011, but a sample of actual events that caused delays to Metra’s commuter service.

⁹ VS Oppenheim at p. 3, para. 13

¹⁰ *Id.* at p. 3, para. 17.

platform at Bartlett, Hanover Park, and Schaumburg. At each of these locations, the station facilities are all on the #2 Main track side, so that, at minimum, passengers would need to leave the shelter, walk across both tracks on wooden crosswalks, all while anticipating the approach of oncoming trains – a serious safety concern. Often this would be done at the last minute, causing passengers to dash across the tracks as trains approached.¹¹ At Bartlett, the platforms are split – the #2 Main platform is east of Oak Avenue, and the #1 Main platform is west of Oak Avenue. Passengers wishing to board inbound Metra trains at Bartlett not only had to cross tracks, but then walk a good “city block” to get to their train.¹²

In addition, the freight railroads’ interchange of traffic at Spaulding results in additional wear and tear on Metra’s infrastructure. Access to the interchange was through a hand-throw switch on the #2 Main track protected by an electric lock. The electric lock is a sensitive device requiring constant adjustment in order to keep wayside signals clear for through movements on the #2 Main track when interchange was not taking place. This causes additional wear and tear on the switch for which Metra bears the cost.¹³

IV. Significant Impacts to Commuter Rail Traffic Caused by the Interchange at Spaulding is not “Reasonable” Based on the Standard in 49 U.S.C. § 10742.

Metra respectfully submits that the “reasonableness” language in § 10742 requires that the effect that the interchange traffic will predictably have on other rail traffic over this line segment, and those that it feeds, must be taken into account. In fact, this should not be a contentious issue, as CP itself, in its Reply to CN’s Post-Remand Brief, state that “the Board should take into account third party costs in its reasonableness determination.”¹⁴

¹¹ *Id.* at p. 3-4, para. 18

¹² *Id.* at p. 4, para. 19

¹³ *Id.* at p. 4, para. 20

¹⁴ CP’s Reply Brief at 2.

In comparing two competing interchange locations, the Interstate Commerce Commission (“ICC”) rightly considered the effects that the interchange traffic would have on other transportation interests.¹⁵ The DC Circuit affirmed the ICC’s finding in *Black v. ICC* (1988), when it agreed with the ICC finding that it was not reasonable, based on the requirements of § 10742, to interchange traffic at Sullivan instead of Palestine. This was due to the fact that interchanging traffic at Sullivan would have required Illinois Central Railroad to cross several public highways and block a high speed mainline at Sullivan.¹⁶ Clearly, it is not only allowable, but necessary that the impacts to other transportation operations be considered when determining the reasonableness of choosing a certain interchange location.

Choosing an interchange point that would cause major delays and additional costs to other rail traffic would certainly not be considered “reasonable” if an alternative exists that does not, as is the case in this instance with Clearing Yard.

V. Conclusion

Metra, clearly, is very concerned about the deleterious effects that this dispute could have on commuter rail operation on the MD-W line. If interchange operations between Canadian National, through its subsidiary, WC, and CP, through its subsidiary, Soo, were to resume at Spaulding, the negative effects on Metra’s commuter service would resume and would likely worsen as the amount of interchange traffic increases with projected increases in freight traffic that CP projects as part of its proposed acquisition of control of Kansas City Southern.¹⁷ Metra

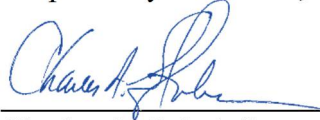
¹⁵ See *Black v. Interstate Commerce Com.*, 837 F.2d 1175 (D.C. Cir. 1988) (“[T]he Commission ruled that the arrangement for interchange at Palestine involving Indiana R.R.’s use of 13.3 miles of Illinois Central’s tracks to reach the interchange point was reasonable and consistent with the requirement in 49 U.S.C. § 10742 that a rail carrier must “provide reasonable, proper and equal facilities for the interchange of traffic.” Attempting to interchange at Sullivan (where there were no interchange facilities) would have created serious problems: backing trains up for a significant distance across a number of public highways . . .”).

¹⁶ *Id.*

¹⁷ See *Canadian Pacific Railway Limited, et al. – Control – Kansas City Southern, The Kansas City Southern Railway Company, et al.*, STB FD 36500, Railroad Control Application, (filed October 29, 2021), at p. 2-364.

urges the Board to consider the significant effects that the interchange traffic will have on Metra's commuter rail operations when determining where the interchange should take place. Metra believes that Clearing Yard is a better option that meets the requirements of § 10742.

Respectfully submitted,



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Dated: April 25, 2022

CERTIFICATE OF SERVICE

I hereby certify that I have on the 25th day of April 2022, caused to be served a copy of the foregoing COMMENTS, upon all parties of record in this proceeding.



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Dated: April 25, 2022

EXHIBIT A

VERIFIED STATEMENT OF RICHARD P. OPPENHEIM

[ATTACHED ON NEXT PAGE]

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

STB Finance Docket No. 36397

**WISCONSIN CENTRAL, LTD. INTERCHANGE WITH SOO LINE RAILROAD
COMPANY**

VERIFIED STATEMENT OF RICHARD P. OPPENHEIM

1. I am Richard P. Oppenheim. I am Director of Operations, Metra Chicago Union Station (“CUS”) District. I have been employed at Metra since June 1997.
2. In my current role my responsibilities include supervising the daily operation of Metra commuter trains on the CUS District, which includes the Milwaukee District – North Line (“MD-N”), Milwaukee District – West Line (“MD-W”), and North Central Service (“NCS”), the latter of which operates over the MD-W line between CUS and Tower B12 at Franklin Park. This encompasses direct supervision of train and engine employees who run the trans, as well as of station and Tower employees. I work closely on a daily basis with Metra mechanical and engineering personnel to ensure that all of the resources necessary to run a safe and on-time operation are available, making adjustments to normal protocols as required. I also work closely with managers and dispatchers at the Canadian Pacific Railway (“CP”), the Canadian National Railway (“CN”), the Union Pacific Railroad Company (“UP”), and the National Railroad Passenger Corporation (“Amtrak”) who handle Metra trains in order to ensure optimum handling of them.
3. Before taking this position, I worked from October 1972 until May 1997 for the Chicago, Milwaukee, St. Paul and Pacific Railroad (“Milwaukee Railroad”), and its successors the Soo

Line Railroad Company (“Soo Line”) and CP as a train dispatcher and chief dispatcher, as well as a brief period as a manager of the Milwaukee Railroad’s Power Bureau. The Milwaukee Railroad/Soo Line/CP territory I handled included Chicago to Milwaukee, Chicago to Kansas City, and Savanna, Illinois to LaCrosse, Wisconsin.

4. A copy of my resume is attached as Attachment 1.
5. I am familiar with Metra’s commuter rail service operations, including on MD-W.
6. Furthermore, I have extensive experience working and interacting with CP and its operation over and dispatching of MD-W, including the interchange operations that took place at Spaulding.

Metra’s Operations on the MD-W

7. MD-W operates between CUS in downtown Chicago and Elgin (Big Timber Road), Illinois, approximately 40 miles west of Chicago’s downtown. The MD-W serves many local communities in the greater Chicagoland area, including Schaumburg and Elgin to the west.¹⁸
8. Before the COVID-19 pandemic, Metra operated 54 trains per weekday over the MD-W, with an additional 24 trains on Saturday, and 18 trains on Sunday. Since the pandemic, however, the number of weekday trains has been decreased to 38 weekday trains (weekend service remains unchanged).
9. Metra expects an eventual return of ridership, and is planning and budgeting accordingly.¹⁹

¹⁸ See Metra, 2020 State of the System Report, (Nov. 2020) (“Metra 2020 Report”) (https://metra.com/sites/default/files/2021-02/2020_State_of_the_System_Report.pdf).

¹⁹ See Metra, 2022 Proposed Operating & Capital Program & Budget (“2022 Metra Budget”) (https://metra.com/sites/default/files/inline-files/Brochure_8.5x11_ProposedBudgetBookElectronic_2022-VFINAL.pdf).

10. In addition to the Metra commuter service, CP, through its Soo Line subsidiary, operates 16 freight trains per day over the MD-W and expects to increase that number to 23 in the future.²⁰
11. While Metra owns the MD-W line, CP retains dispatching and operational authority over the line.

Delays to Metra's Operations Caused by Interchange Traffic at Spaulding

12. Metra began keeping a log of delays caused by CP interchange traffic at Spaulding in September of 2010. The log was kept as a way of gathering evidence to convince CP to either conduct interchange movements at night when Metra is not operating, or to construct a Control Point in Bartlett, which would help alleviate the problem. I have attached a copy of the log of delays to this statement as Attachment 2 ("Delay Log, VS Oppenheim, Att. 2")
13. Metra ceased logging delays in June of 2011 when it became apparent that CP was not going to take either action, regardless of the obvious negative impacts to Metra's operations.
14. The Interchange Delay Log is attached as **Exhibit A**. While it was meant to capture actual delays, caused specifically by the interchange traffic, during the time it was maintained, it is unlikely that ALL delays caused by the interchange traffic were captured. The Interchange Delay Log should be considered a representative sample of the delays caused by the interchange traffic between September of 2010 and June of 2011.
15. Interchange operations between CP and CN were moved to Clearing Yard in August of 2011.
16. After the interchange traffic was moved to Clearing Yard, delays to Metra's operations decreased considerably.

²⁰ *Canadian Pacific Railway Limited, et al. – Control – Kansas City Southern, The Kansas City Southern Railway Company, et al.*, STB FD 36500, Railroad Control Application, (filed October 29, 2021), at p. 2-364.

17. No delays to Metra's services were experienced due to the interchange traffic at Clearing Yard.

Safety and Maintenance Impacts Caused by the CP Interchange Traffic at Spaulding

18. In many instances, while interchange activities were taking place at Spaulding, Metra traffic could only use the #1 Main track between the Tower B35 and Roselle West Control Points. This would put Eastward Metra trains (inbound toward Chicago) on the opposite platform at Bartlett, Hanover Park, and Schaumburg. At each of these stations that station facilities are all on the #2 Main track side, so that passengers would need to leave the shelter, walk across both tracks on wooden crosswalks while anticipating the approach of the train. Often this would be done at the last minute, causing passengers to dash across the tracks as a train approached.

19. At Bartlett, the platforms are split -- the #2 Main track platform is East of Oak Avenue, and the #1 Main track platform is West of Oak Avenue. Passengers wishing to board inbound Metra trains at Bartlett not only had to cross tracks, but then walk a good "city block" to get to their train.

20. Access to the Spaulding interchange was through a hand throw switch on the #2 Main track, which is protected by an electric lock. The electric lock is a sensitive device requiring constant adjustment in order to keep wayside signals clear for through movements on the #2 Main track when interchange operations were not taking place. Interchange traffic also caused additional wear and tear on the switch.

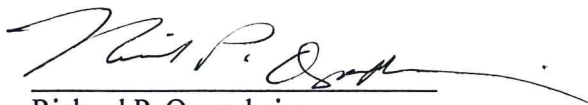
21. Service delays and safety issues tend to convince Metra customers to seek alternative modes of transportation, which places a greater financial burden on Metra.

22. After the interchange was moved to Clearing Yard, the safety and maintenance impacts of the interchange at Spaulding are no longer an issue.

SIGNATURE APPEARS ON NEXT PAGE

I, Richard P. Oppenheim, declare under penalty of perjury that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file this Verified Statement.

Executed on April 22, 2022.

A handwritten signature in black ink, appearing to read "Richard P. Oppenheim", with a long horizontal flourish extending to the right.

Richard P. Oppenheim
Director of Operations
Metra Chicago Union Station District

ATTACHMENT 1 TO EXHIBIT A

RESUME AND WORK HISTORY OF RICHARD P. OPPENHEIM

[ATTACHED ON NEXT PAGE]

Memorandum

June 5, 2020

TO: To Whom It May Concern

FROM: R. P. Oppenheim, Assistant Superintendent

SUBJECT: WORK HISTORY – RICH OPPENHEIM

ERIE LACKAWANNA

Beginning in July 1968, I worked for the Erie-Lackawanna Railway – now a part of New Jersey Transit – as Tower Operator on their New York Division during Summers and Christmas vacations while I was attending Northwestern University. Erie Lackawanna ran a complex Commuter Rail operation similar to Metra's serving the New York metropolitan area. At the time, they had 12 Interlocking Towers in service, and I was qualified in 11 out of the 12.

Approximate employment dates were:

- July to September 1968.
- December 1968 to January 1969.
- June 1969 to September 1969.
- December 1969 to January 1970.
- June 1970 to September 1970.
- December 1970 to January 1971.
- June 1971 to September 1971.
- December 1971 to January 1972.
- June 1972 to September 1972.

MILWAUKEE ROAD (later acquired by SOO LINE, then by CP RAIL)

- Hired as a Tower Operator in October 1972. Qualified and worked in 9 different interlocking Towers in the Chicago and Milwaukee area.
- July 1973 – began training as a Train Dispatcher in the Milwaukee Dispatching office.
- August 28, 1973 began working as an Extra Train Dispatcher in Milwaukee while continuing to work in the Towers when no Dispatcher work was available. Also qualified on Chief Dispatchers position and worked as Chief Dispatcher when vacancies occurred. Dispatching Territory included Suburban train operations on what was to become Metra's Milwaukee North Line.
- May 1978 obtained permanent Dispatcher position in the Milwaukee office.
- March 1979 promoted to Manager of Milwaukee Road Power Bureau in Chicago. Monitored train Operations and handled Locomotive distribution throughout the

Milwaukee Road system between Chicago and Tacoma, Washington, as well as to Louisville, Kentucky.

- May 1, 1980. Milwaukee Road opened the Chicago Dispatching office on the 2nd floor of Union Station. I elected to resume Train Dispatching in the new office. Territory included what later became Metra's Milwaukee West Line (in addition to the North Line). Also handled freight traffic as well as Amtrak traffic between Chicago and Milwaukee as well as freight traffic between Chicago and Savanna Illinois.
- August 1984. Chicago Dispatching office expanded to included Chicago to Kansas City. Worked a position that relieved the Chief Dispatcher on weekends and a desk 3 days during the week (2 of these handling future Metra territory). Worked Chief Dispatcher position whenever regular Chief needed to be off, sometimes for extended periods of time.
- September 1987 to February 1997, worked day Dispatcher position handling both the North and West Suburban lines including to Milwaukee and Savanna.
- February 1997, now CP rail, Chicago Dispatching office was closed with all Dispatching being moved to Minneapolis. February 1997 to May 1997, "commuted" to Minneapolis assisting in the Chicago to Minneapolis relocation while also continuing to handle the C&M (North Line).
- Resigned from CP in May of 1997.

METRA

- Hired in June 1997 (date of Hire 6/16/1997) as "new" employee (i.e. did not carry "Prior Rights" from the Milwaukee). Worked as Extra Tower Clerk protecting Milwaukee District's Tower A2 (both as Leverman and Train Director) and Tower A5.
- January-February 1999, trained at Metra CCF on various Dispatching desks including Rock Island District, Electric District, and Southwest Service. Also Milwaukee District Tower B12.
- February 1999-December 2002. Worked as Extra Dispatcher CCF continuing to handle all territories.
- During 2001-2002 also trained and qualified as Load Dispatcher at Randolph Control on the Electric District. Worked approximately half of the time at Randolph Control and half of time at CCF.
- December 23, 2002. Promoted to Trainmaster on CUS District.
- April 12, 2012. Promoted to Senior Trainmaster on CUS District.
- February 2013. Promoted to Assistant Superintendent on CUS District.
- July 2020 to present. Promoted to Director Operations CUS District.

ATTACHMENT 2 TO EXHIBIT A

REPRESENTATIVE SUMMARY OF DELAYS

[ATTACHED ON NEXT PAGE]

TRAIN #	DELAY	" Late at Destination	REMARKS
2232	4"	OT	Held Tower B35 4 mins for Patrol to clear at Spaulding
2242	7"	7"	Follow Spaulding Patrol Bartlett to Schaumburg
2211	9"	7"	Red signal Spaulding -- Patrol getting in clear
2234	10"	10"	Red signal B35 - then run #1 MT to Spaulding around
			patrol working on #2 MT at Spaulding
2213	10"	10"	Spaulding wait for #2234 to clear #1 MT around patrol
2234	8"	8"	Tower B35 for 2213 to clear running around Splding patrol
2242	19"	16"	Blocked by Spaulding patrol at Spaulding, then followed
			to B17
2219	5"	5"	Spaulding wait for Patrol to clear
2234	10"	10"	Tower B35 for 2213 to clear running around Splding patrol
2250	10"	10"	Following Spaulding Patrol to Roselle W. then use #1 MT
			to B17 around Spaulding Patrol
2713	12"	12"	Blocked by Spaulding patrol at Spaulding
2215	5"	5"	Spaulding Patrol getting in clear.
2252	6"	4"	Stop signal at Wooddale East -- Spaulding Patrol ahead
2242	14"	14"	Following Spaulding patrol from Bartlett to Tower B17
2250	19"	19"	Itasca East - Spaulding patrol ahead died on hrs of svc.
2251	16"	16"	Late turn from 2250 per above
2256	14"	14"	Late turn from 2251 per above
2242	11"	11"	Held at Spaulding waiting for Spaulding patrol to clear
2217	30"	30"	Held at Itasca - Spldg patrol with 4000' attempting to get
			in Clear at Itasca Park did not fit - had to double in.
2250	15"	20"	Held Roselle West - crossover after WBD = Patrol died B17
2251	15"	12"	Late turn CUS off 2250
2256	9"	6"	Late turn Big Timber from 2251
2213	6"	6"	Spaulding Patrol getting in clear.
2248	1'7"	annulled and psgrs	to 2250 acct Patrol got knuckle btn Hanover Pk & Schaumbg
2250	5"		
2245	1'0"	annulled and psgrs	to 2247 at Roselle - 2245 eqpt to CUS for 2249
2247	8"	8"	Meet 2250 at Roselle running around patrol
2251	10"		
2248	14"	10"	following Spaulding patrol
2248	10"	10"	Red signal B35 - Waiting for Patrol to clear
2714	7"	7"	#1 MT B35- W Roselle around patrol
2202	7"	7"	Ran #1 MT B35-Roselle W around patrol
2203	7"	7"	Late turn off 2202

TRAIN #	DELAY	" Late at Destination	REMARKS
2246	13"	7"	Following Spaulding Patrol to B17
2255	12"	12"	Meeting Spaulding Patrol Tower B35
2246	7"	7"	Following Spaulding Patrol to B17
2236	10"	10"	Tower B35 - wait for Patrol to get in clear at Spaulding
2238	10"	10"	Run around Patrol B35-Spaulding - wait for patrol to clear plant
2200	11"	11"	Run #1 B35-Roselle W around patrol - psgrs on wrong side
2207	14"	16"	Roselle W meet #2228 running #1 MT around patrol
2200	9"	9"	Run #1 B35-Roselle W around patrol - psgrs on wrong side
2254	36"	32"	Patrol died East of Spaulding - meet #2251 at Spaulding, back over to #1 MT, run #1 to Roselle W.
2256	20"	20"	Hold Roselle W to meet #2253 run #1 to B17 around patrol
2250	17"	11"	Following Spaulding Patrol Roselle to B17
2246	18"	11"	Following Spaulding Patrol Schaumburg to Bensenville
2247	13"	6"	Late turn CUS off 2246
2254	20"	22"	Follow Spaulding patrol to Roselle W; Run #1 RS W to B17
2255	24"	24"	Late turn CUS off 2254
2206	6"	8"	Blocked by Spaulding Patrol at Spaulding
2208	10"	6"	Following 2206
2205	7"	8"	Late turn CUS off 2206
2228	7"	6"	Late turn Big Timber off 2205
2215	11"	11"	Hold Spaulding for 2236 running #1 around Patrol
2236	8"	6"	Run #1 B35-Spaulding - wait for patrol to clear plant Spaulding