



www.cn.ca

304568

ENTERED
Office of Proceedings
May 18, 2022
Part of
Public Record

Corporate Services

Kathryn J. Gainey
Deputy General Counsel

601 Pennsylvania Avenue NW
North Building, Suite 500
Washington, DC 20004
T: 202-347-7840

Kathryn.Gainey@cn.ca

May 18, 2022

Via E-Filing

Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
395 E Street S.W.
Washington, D.C. 20423

Re: Docket No. EP 770 (Sub-No. 1), *Urgent Issues in Freight Rail Service—
Railroad Reporting*

Dear Ms. Brown:

The U.S. rail operating subsidiaries of Canadian National Railway Company (collectively, "CN") respectfully submit this letter in response to the Board's order served on May 6, 2022, in the above-captioned docket.

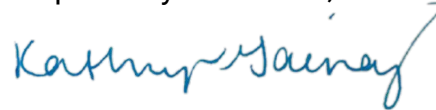
CN is submitting the weekly performance data for new metrics 1 through 7 for Week 19 (measured for the reporting period as Saturday 12:01 a.m. to Friday 11:59 p.m.), as well as a description of CN's reporting methodology for those metrics. There are several instances where the data requests did not provide explicit instructions or definitions. CN will describe in the attached methodology document any assumptions, exclusions, or modifications to its data in order to respond to the requests, including the order's instruction that CN only provide data for its U.S. network. Where possible, CN will provide data consistent with how it measures performance in the normal course of business. Where the Board has requested information that CN does not collect in the normal course of business, CN has made best efforts in the time available to develop a process to report data in response to the Board's request. If CN revises its methodology for any of the metrics, CN will file an updated methodology document in this docket.

CN expects that other Class I railroads will report data differently, based on their own data-keeping systems and operating practices. CN cautions against drawing conclusions across railroads based on these data submissions, just as with the weekly service reporting that was initially commenced in Docket No. EP 724 (Sub-No. 3), and subsequently promulgated in EP 724 (Sub-No. 4) and (Sub-No. 5) at 49 C.F.R. pt. 1250.

The STB provided templates and a technical information document to CN on May 13, 2022. CN is providing its service performance data based on the template provided, in both XLS and CSV format. In the event of any conflict between the technical information document and the template, CN will follow the template.¹

The Board explained in its May 6 decision that, although not all Class I carriers are experiencing service problems to the same degree, it needs to collect this information on a temporary basis for six months so that the Board can assess current service issues across the United States rail network as a whole. CN has worked hard to prepare its methodology to begin reporting the seven new metrics in the time provided. CN's willingness to provide this information to the Board under these circumstances should not be construed as an endorsement of the value or the appropriateness of this information for the Board's stated purpose or for other regulatory purposes, including those that may be explored in other pending proceedings, such as *First-Mile / Last-Mile Service*, Docket No. EP 767.

Respectfully submitted,



Kathryn J. Gainey

Enclosure

¹ CN has used Grand Trunk Corporation ("GTC") as the railroad identifier in the template, as CN's U.S. rail operating subsidiaries are reported to the Board on a consolidated Class I basis under the name GTC. See *Consol. Reporting By Commonly Controlled R.Rs.*, 5 S.T.B. 1050 (2001), codified at 49 C.F.R. § 1201(1-1)(b)(1). They include Illinois Central Railroad Company, Wisconsin Central Ltd., Grand Trunk Western Railroad Company, Bessemer and Lake Erie Railroad Company, and Chicago, Central & Pacific Railroad Company.

GTC's STB EP 770 (SUB-NO. 1) SERVICE METRICS AND ASSOCIATED METHODOLOGY

May 18, 2022

1. Weekly average dwell for 11th through 20th largest U.S. yards

- Follows methodology currently used to report weekly average dwell under 49 C.F.R. pt. 1250 for ten largest yards.
 - Industry dwell used (same as used for AAR performance report).
 - Average elapsed time from entry to exit of cars processed at major yards (excludes cars on through trains).
 - Entry events include train arrival, interchange receipt and customer release.
 - Exit events include train departure, interchange delivery and first placement.
 - Excludes cars placed into hold or bad order.
- The ten yards selected for this report are those which have the next largest number of cars processed as of May 18, 2022 (after the first ten yards reported under 49 C.F.R. pt. 1250).
- This same list of stations will be reported each week during the temporary reporting period.
- Yards are listed in alphabetical order.

2. Weekly average train starts per day (intermodal, grain unit, coal unit, automotive unit, crude oil unit, ethanol unit, other unit, and manifest)

- CN collects this data in the normal course of business.
- Includes U.S. originated trains.
- Includes cross-border trains once they enter the U.S.
- Excludes foreign, haulage, passenger, work, on company service (OCS), and local trains.
- Reported by train types:
 - Intermodal (I/M 100 series)
 - Grain unit (G type)
 - Coal unit (C type)
 - Automotive unit (E type)
 - Crude oil unit (specific train type/symbol)
 - Ethanol unit (specific train type/symbol)
 - Other unit - train types B (potash), S (sulphur), and U (other unit) not explicitly named in ethanol unit or crude oil unit lists
 - Manifest (A/M types and X 200-400 series)

3. Following information for privately-owned, TTX-owned, railroad-owned:
(i) weekly average cars per day in storage, (ii) weekly average number of cars per day in service (no mileage); (iii) weekly average number of cars per day in service with mileage; (iv) weekly average car miles per day; and (v) aggregate car miles per week.

- CN's response uses tools that CN maintains in the normal course of business.
- TTX-ownership identified using Umler.
- Railroad-ownership includes both CN-owned or leased and foreign-owned or leased.
- CN stores privately-owned cars pursuant to storage agreements with its customers.
- Excludes cars that are in heavy bad order status, OCS cars, and cars spotted at customer facilities.
- For (i), cars in storage are designated with codes for long-term storage, stored serviceable, and bulk spares.
- For (ii) and (iii), cars in service in the United States identified as all cars included in CN's Car Velocity System calculations.
- For (ii), "no mileage" is a count of cars with an accrued 24 hours of time, zero miles accumulated in a train movement, and did not move in yard activity.
- For (iii), "with mileage" is a count of cars that traversed more than zero miles. Does not include cars that moved solely in yard activity during the 24 hours.
- For (iv) and (v), car miles calculated based on CN's Car Velocity System.
- For weekly average car miles per day in (iv), the total car miles for the period in the U.S. is divided by 7 for the daily average.

4. Weekly unplanned recreds due to federal hours of service regulations (division and U.S. system) and recrew rate as percentage of total crew starts

- CN monitors recreds in the normal course of business.
- CN has three divisions in the United States: Central, Gulf, and Midwest.
- Percentage is calculated as unplanned recreds divided by total crew starts in the United States, where total crew starts represents all crew starts (road and yard, including recreds).
- Unplanned recreds for reasons other than hours of service are minimal.
- Recrew rate is provided in decimal format and not percentage.

5. Percentage scheduled spots and pulls fulfilled (division and U.S. system)

- Based on CN's Local Service Commitment Performance (LSCP) metric, which CN uses in the normal course of business.
 - Each day that service is performed at a customer facility, CN provides a local service notification to its customer describing the service (spots or pulls) that will be provided that day. If such service is performed, it is counted as fulfilled under LSCP metric. Where CN attempts to fulfill the local service but it cannot be provided due to customer fault (e.g., broken rail on customer track or gates locked), that is counted as fulfillment.
 - LSCP does not include service for manifest traffic in those instances when it is performed by mainline trains.
 - LSCP does not include unit trains and intermodal.
- CN has three divisions in the United States: Central, Gulf, and Midwest.
- Spots and pulls fulfilled is provided in decimal format and not percentage.

6. Weekly average local trains cancelled per day and aggregate local trains cancelled per week (division and U.S. system) and cause (crew, locomotive power, or other)

- CN's focus is the car movement from origin to destination, which is covered through different metrics such as trip plan performance to ETA, yard dwell, and local service performance, which the Board is receiving here in metrics 1, 5 & 7. CN does not systematically collect data on local train cancellations or the cause of the cancellation in the United States in the normal course of business.
- In an effort to report local train cancellations in the United States on a temporary basis for six months, CN will do a manual text search of certain data fields for any language indicating a cancelled local train in the United States.
 - Confirm if the train had any train event and car history data and if so it is not a cancelled local train.
- Local trains may be cancelled for a variety of reasons, including because no work is to be performed or because CN does not have clearance needed from a foreign railroad.
- CN cautions against drawing conclusions from data reported for this metric.

7. (i) For manifest service, percentage cars constructively or actually placed at destination within 24 hours of original ETA; (ii) for the following types of unit trains (grain unit, coal unit, automotive unit, crude oil unit, and ethanol unit), the percentage of trains arriving at destination within 24 hours of original ETA; (iii) for intermodal traffic, the percentage of trains arriving at the terminal within 24 hours of the original ETA.

- CN's response uses tools that CN maintains in the normal course of business.
- Data is provided in decimal format and not percentage.
- For 7(i), cars (manifest)
 - Includes domestic U.S. traffic only (origin and destination in the U.S.).
 - Includes cars moving in manifest trains where the cars were constructively or actually placed at destination within 24 hours of the original ETA or delivered or offered at interchange.
- For 7(ii), unit trains (grain, coal, automotive, crude, and ethanol unit)
 - Calculated based on train event history.
 - Reported by train types:
 - Grain (G type), Coal (C type), and Automotive (E type)
 - Crude oil and ethanol (specific train type/symbol)
 - Excludes trains with U.S. origin and Canadian destination.
 - For domestic U.S. trains only (origin and destination in the U.S.), based on arrival of train at destination within 24 hours of original ETA at destination.
 - For cross-border trains (Canadian origin and U.S. destination), adjust original ETA at U.S. destination based on arrival time at U.S. border crossing in order to provide data only for CN's network in the United States.
 - For unit trains interchanged with other carriers, original ETA is to the location where the train is offered or delivered for interchange.
- For 7(iii), trains (intermodal)
 - Same methodology as above in 7(ii).
 - Limited to intermodal trains (I/M 100 series).