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VIA ELECTRONIC FILING

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May 25, 2022

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

ENTERED
Office of Proceedings
May 25, 2022
Part of
Public Record

**RE: Docket No. EP 770 (Sub No. 1), Urgent Issues in Freight Rail Service—Railroad Reporting.
Revision to May 18, 2022 Filing.**

Dear Ms. Brown:

BNSF respectfully submits the attached weekly performance data for the week of May 16–20 in accordance with the Board's May 6, 2022 decision in the above-referenced proceeding. Additionally, BNSF is submitting a revision to our May 18, 2022 filing setting forth our methodology for capturing the reported data as well as a revision to our May 18 submitted data for the week of May 9–13.

Since filing our initial report on May 18, we discovered two errors that we wish to bring to your attention and correct: first, our description of Items 3(ii) and 3(iii) in our May 18 filing includes a distinction between railroad-controlled and private-controlled cars that we do not intend to capture in our reported data and in fact did not report on May 18; and second, the data included in our report for Items 3(i), 3(ii), and 3(iii) indicate weekly aggregate data, not the weekly average.

In our May 18 reply, we stated the following with respect to Items 3(ii) and 3(iii):

For Items 3(ii) and (iii), a railroad-controlled (either railroad-owned or TTX-owned) car is considered in active service when it is online and not in storage. Private cars that are on spot, constructively placed, or held on a leased track are not considered in active service. Cars log miles when they are in the consist of a train that is moving. These rules inform how BNSF calculates the car velocity metrics we provide in network updates to our customers and are thus consistent with the service data we share with our customers. Our reported metric for these sub items will be the aggregate number of cars with or without miles for each car ownership category, divided by seven.

Our reported data does not reflect a distinction in how railroad-controlled cars are considered in service versus private cars. Accordingly, we have thus revised this definition in the attached methodological explanation to reflect the difference from our internal metric as follows:

For Items 3(ii) and (iii), all cars that are stored, on spot, constructively placed, offered in interchange, or held on a leased track are not considered as in service. Cars log miles when they are in the consist of a train that is moving. Our reported metric for these sub items will be the aggregate number of cars with or without miles for each car ownership category, divided by seven.

Secondly, our reported data for Items 3(i), 3(ii), and 3(iii) from our May 18 report reflect the weekly aggregate numbers for each metric as opposed to the weekly average numbers. We have revised our reported data to divide by seven to reflect the weekly average in the revised report attached to this filing and e-mailed separately to OPAGAC.

We apologize for any confusion and are happy to discuss this in further detail if the Board has any questions.

Sincerely,



Travis Owsley
Senior General Attorney

CC: Mr. Michael Higgins, Office of Public Assistance, Government Affairs, and Compliance

Attachments

- Revised methodology document.
- Revised data for week of May 9–13.
- Data for week of May 16–20.

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. EP 770 (Sub No. 1)

URGENT ISSUES IN FREIGHT RAIL SERVICE—RAILROAD REPORTING

REPLY OF BNSF RAILWAY COMPANY

BNSF Railway Company submits the attached weekly performance data in accordance with the Board's May 6, 2022 decision in the above-referenced proceeding. Pursuant to that decision, please find below an explanation of BNSF's methodology for calculating each of the metrics identified in the temporary weekly performance data requirements. If the Board finds a need for additional context to facilitate its understanding of the reported performance data, we will be happy to provide it, either in a subsequent filing or through the bi-weekly discussions with the Office of Public Assistance, Governmental Affairs and Compliance (OPAGAC) mandated by the Board's decision.

Item 1

The weekly average terminal dwell times, measured in hours, for the carrier's 11th through 20th largest terminals (to augment the system-wide data and the data currently reported for the ten largest terminals under 49 C.F.R. § 1250.2(a)(5)).

BNSF will report this data for the additional ten terminals in a manner consistent with our existing reporting for our ten largest terminals pursuant to 49 C.F.R. § 1250.2(a)(2).¹

¹ See Revised Methodological Report of BNSF Railway Company, *United States Rail Service Issues—Performance Data Reporting*, Ex Parte No. 724 (sub nom 4), at 2 (July 22, 2020).

Item 2

The weekly average number of train starts per day (to augment the weekly average number of trains held per day data currently reported under 49 C.F.R. § 1250.2(a)(5)), sorted by train type (intermodal, grain unit, coal unit, automotive unit, crude oil unit, ethanol unit, other unit, and manifest).

BNSF will report data for each category of listed trains. The aggregate number of train starts for each category in a week will then be divided by seven to provide the weekly average. A “train start” for purposes of this metric means the initial departure of a train from its origin terminal as well as the creation of a new train from the separation of a previously departed train.

Item 3

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

For Item 3(i), BNSF will report the total number of cars appearing in storage each day during the week divided by seven.

For Items 3(ii) and (iii), all cars that are stored, on spot, constructively placed, offered in interchanges, or held on a leased track are not considered as in service. Cars log miles when they are in the consist of a train that is moving. Our reported metric for these sub items will be the aggregate number of cars with or without miles for each car ownership category, divided by seven.

For Item 3(iv), we will provide the weekly average of our car velocity metric, calculated as the total car miles traveled divided by car cycle days. This is consistent with the car velocity

metric we communicate to our customers through our network updates. For Item 3(v), we will report the sum of car miles for each ownership type logged each week divided by seven.

Item 4

With respect to recreds, for each operating division and for the system: (i) the weekly number of unplanned recreds due to compliance with federal hours of service regulations, and (ii) the recrew rate measured as a percentage of total crew starts.

BNSF will utilize data for crew starts coded as relief starts (recrows) and report the metric as specified in the Board's decision.

Item 5

For each operating division and for the system, the percentage of scheduled spots and pulls that were fulfilled. (This is sometimes referred to in the industry as "Industry Spot and Pull.")

In response to this item, BNSF is submitting its Local Service Performance metric, which is a well-known metric that BNSF has made available to its customers since January 2020 and has been addressed in detail in prior BNSF filings in other STB proceedings.² The Local Service Performance metric reflects the system-wide aggregation of an Industry Service Metric that BNSF tracks for each of our individual customer facilities, which is calculated by reference to BNSF's performance against the Base Service Plans for each of those facilities. The Base Service Plan for a given facility includes the following: (1) the days of service; (2) the spot times (i.e., the time a car must be ordered to make same day service on a defined service day or within a specific

² See Opening Comment of BNSF Railway Company, *First-Mile/Last-Mile Service*, Ex Parte No. 767 (Dec. 17, 2021).

processing time); (3) the pull times (i.e., the time a car must be released from placement to make same day service on a defined service day or within a specific processing time); and (4) the “processing time” that BNSF has allotted to complete its work with respect to a specific car.

The Industry Service Metric records a “win” each time a car is pulled or spotted in accordance with the Base Service Plan, and the metric is expressed as a percentage of the number of wins divided by the total number of spots and pulls at the facility. The Local Service Performance Metric reported here is the average of aggregated Industry Service Metrics systemwide and within each division. BNSF’s Local Service Performance Metric applies only to manifest traffic and is being calculated and reported here in a manner consistent with how BNSF has historically calculated and reported it to our customers. Other data reported pursuant to 49 C.F.R. Part 1250 captures service performance in the first and last mile for various types of unit trains, and BNSF does not currently track a metric that reflects a combination of first and last mile service across all manifest and all other traffic types.

Item 6

For each operating division and for the system, the weekly average number of local trains cancelled per day, and the aggregate number of local trains cancelled per week, broken down by cause (crew, locomotive power, or other).

BNSF has not historically collected cause information for cancelled local trains, and BNSF’s systems do not presently support cause codes for cancelled local trains. For this reason, BNSF is reporting all cancelled local trains in the Other category.

Item 7

(i) For rail cars moving in manifest service, the percentage of cars constructively or actually placed at destination within 24 hours of the original estimated time of arrival. (ii) For the following types of unit trains (grain unit, coal unit, automotive

unit, crude oil unit, and ethanol unit), the percentage of trains constructively or actually placed at destination within 24 hours of the original estimated time of arrival. (iii) For intermodal traffic, the percentage of trains that arrive at destination within 24 hours of the original estimated time of arrival.

BNSF's formulation of the OTP metric for purposes of this reporting requirement measures the actual or constructive placement of a unit against the original estimated time of arrival ("ETA"). This metric records a "win" each time a unit is placed within 24 hours of the original estimated time of arrival for the unit. BNSF does not track arrival/placement at a train level for unit trains. Accordingly, for grain, coal, crude, and ethanol unit trains, the metric will be expressed as the percentage of the total number of cars placed within 24 hours of the original ETA divided by the total number of cars of placed for that category of unit train. For intermodal trains, the metric will be expressed as the total number of intermodal units (i.e., containers or trailers) deramped within 24 hours of the original ETA divided by the total number of units deramped. For automotive unit trains, the metric will be expressed as the total number of vehicles deramped divided within 24 hours of the original ETA by the total number of vehicles deramped.

BNSF will report these additional data accrued each week on the following Wednesday during the six-month reporting period along with the service performance data already reported pursuant to 49 C.F.R. Part 1250 and will provide a further narrative update in the event BNSF changes the methodology it uses to compile and calculate the reported metrics.

Respectfully submitted,



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Counsel for BNSF Railway Company

Dated: May 25, 2022