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May 25, 2022

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

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

Dear Ms. Brown:

Pursuant to the order of the Surface Transportation Board (“STB”) dated May 6, 2022, in the above-captioned proceeding, The Kansas City Southern Railway Company (“KCS”) submitted its first data report and an explanation of the methodology for assembling that data on May 18. Pursuant to subsequent discussions with STB staff, KCS submits with this letter an amended initial report and explanation of the changes, plus supplemental explanation of its methodology.

Changes to the Initial Report

In its accompanying amended initial report, KCS made changes to its reporting in Items 2, 4, 5 and 7. In Item 2, KCS corrected the data previously reported – total weekly train starts of the various train types – to average train starts per day of each train type; that is, KCS divided the number initially reported for each train type by 7. In the portions of Items 4, 5 and 7 to be reported as percentages, KCS restated each reported percentage as a number between 0 and 1, as requested by agency staff.

Clarification of Reporting Methodology

With respect to its methodology, KCS had stated that in Items 5 and 6 it would use the four Transportation divisions – North, Speedway, Southeast and Border. However, in running the report, KCS found that on Items 5 and 6, which are based on yard activity, the data available assigns spot and pull percentages and local trains canceled to five divisions – the four Transportation divisions plus the Shreveport division. As Shreveport is where three of the four Transportation divisions come together, KCS cannot readily assign local trains or spot and pull activity based in Shreveport’s Deramus Yard or its support yards to one or another of the Transportation divisions. Hence, for Items 5 and 6, KCS will report data using the Shreveport division in addition to the four Transportation divisions.



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Finally, KCS noted that the data reported May 18 showed higher than expected renews assigned to the Southeast division. KCS determined that the renews that occurred between Beaumont and Kendleton, primarily in transiting Houston, were recorded as occurring in the Southeast division. In the accompanying amended initial report and going forward, renews occurring between Beaumont and Kendleton, as well as south of Kendleton, will be reported in the Border division.

If there are any questions concerning this description or concerning the filings submitted using this methodology, please contact the undersigned.

Sincerely,

DocuSigned by:

David C Reeves

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David C. Reeves