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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Finance Docket No. 36500

CANADIAN PACIFIC RAILWAY LIMITED; CANADIAN PACIFIC RAILWAY
COMPANY; SOO LINE RAILROAD COMPANY; CENTRAL MAINE & QUEBEC
RAILWAY US INC.; DAKOTA, MINNESOTA & EASTERN RAILROAD
CORPORATION; AND DELAWARE & HUDSON RAILWAY COMPANY, INC.

—CONTROL—

KANSAS CITY SOUTHERN; THE KANSAS CITY SOUTHERN RAILWAY
COMPANY; GATEWAY EASTERN RAILWAY COMPANY; AND THE TEXAS
MEXICAN RAILWAY COMPANY

UNION PACIFIC RAILROAD COMPANY'S AMENDMENTS TO COMMENTS

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June 9, 2022

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SURFACE TRANSPORTATION BOARD

Docket No. FD 36500

CANADIAN PACIFIC RAILWAY LIMITED; CANADIAN PACIFIC RAILWAY COMPANY; SOO LINE RAILROAD COMPANY; CENTRAL MAINE & QUEBEC RAILWAY US INC.; DAKOTA, MINNESOTA & EASTERN RAILROAD CORPORATION; AND DELAWARE & HUDSON RAILWAY COMPANY, INC.
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KANSAS CITY SOUTHERN; THE KANSAS CITY SOUTHERN RAILWAY COMPANY; GATEWAY EASTERN RAILWAY COMPANY; AND THE TEXAS MEXICAN RAILWAY COMPANY

UNION PACIFIC RAILROAD COMPANY’S AMENDMENTS TO COMMENTS

Pursuant to Decision No. 18, Union Pacific Railroad Company is submitting this filing to address amendments to its Comments and Request for Conditions, including supporting verified statements, that are necessitated by Applicants’ filing of their “Amended Operating Plan” (CP-47/KCS-34).

Applicants’ amended filing does not require UP to make any substantive changes to its Comments. UP’s Comments show an unconditioned combination of CP and KCS would likely cause a significant loss of competition, especially for traffic moving via the Laredo Gateway. UP’s Comments also show Applicants failed to address the need for investment in certain jointly used infrastructure that is critical to implementing their proposed transaction. Applicants’ amendments do not address either the competitive consequences of the proposed transaction or the gaps in their capacity analysis.

However, Applicants’ amended filing does require UP to make certain technical amendments to its Comments. Applicants added textual material to their operating plan,

which changed certain page, footnote, and table references to materials cited in UP's Comments. Applicants also discovered errors that had caused them to omit trains from their Base Plan and Growth Plan. Correcting those errors changed train counts on some segments, as well as certain operating statistics. *See* Amended Operating Plan at 82–84. UP's Comments referenced train counts and operating statistics that changed as a result of Applicants' corrections, so accounting for those corrections requires amendments to UP's Comments. However, none of the Applicants' corrections materially change UP's use of the train counts and operating statistics in its Comments.

Because Applicants' amended filing does not require UP to make any changes to the substance of its Comments, UP is not filing a full set of amended comments. UP is instead submitting a list of technical amendments to its Comments as Attachment A hereto.

Respectfully submitted,

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June 9, 2022

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of June, 2022, I caused a copy of the foregoing document to be served by email or by first-class mail, postage prepaid, on the Secretary of Transportation, the Attorney General of the United States, Applicants' representatives, Administrative Law Judge Thomas McCarthy, and all other parties of record.

/s/ Michael L. Rosenthal

ATTACHMENT A –TECHNICAL AMENDMENTS

I. Technical Amendments to UP’s Comments

- Page 10, Footnote 33: “APP Vol. 2 at 340, OP Plan ¶ 238” becomes “Am. OP Plan at 120, ¶ 294”
- Page 10, Footnote 34: “APP Vol. 2 at 344, OP Plan ¶ 244” becomes “Am. OP Plan at 125, ¶ 300”
- Page 15: “10 per day” becomes “12 per day”
- Page 15, Footnote 48: “Compare APP Vol. 2 at 452, OP Plan, App. N at 1, with id. at 454, OP Plan, App. O at 1” becomes “Compare Am. OP Plan, App. N at 1, with id., App. O at 1”
- Page 23, Footnote 79: “APP Vol. 2 at 283, OP Plan ¶ 76” becomes “Am. OP Plan at 42, ¶ 98”
- Page 25, Footnote 88: “OP Plan work paper ‘HC – 1.Proposed Final FTI Rail to Rail Diversion Results for Merger Application_matching Finance with Truck to Rail.xlsx’” becomes “Am. OP Plan workpaper ‘1.Proposed Final FTI Rail to Rail Diversion Results for Merger Application_matching Finance with Truck to Rail 10_13_21’”
- Page 31, Footnote 108: “APP Vol. 2 at 317, OP Plan ¶ 162” becomes “Am. OP Plan at 95, ¶ 219”
- Page 51, Footnote 184: “APP Vol. 2 at 340, OP Plan ¶ 238” becomes “Am. OP Plan at 120, ¶ 294”
- Page 52, Footnote 188: “APP Vol. 2 at 340, OP Plan ¶ 237” becomes “Am. OP Plan at 120, ¶ 294”
- Page 53: “\$279 million” becomes “\$276 million”
- Page 53, Footnote 190: “APP Vol. 2 at 340–41, OP Plan ¶¶ 239–40 & Table 8” becomes “Am. OP Plan at 120–22, ¶¶ 295–96 & Table 11”
- Page 53, Footnote 191: “APP Vol. 2 at 276, OP Plan ¶ 52” becomes “Am. OP Plan at 22, ¶ 52”
- Page 54: “CPKC traffic will increase from 7.7 trains per day to 16.8 trains per day, an increase of 9.1 trains per day, or 118%” becomes “CPKC will increase from 7.94 trains per day to 16.25 trains per day, an increase of 8.31 trains per day, or 105%”
- Page 54: “CPKC traffic will increase from 7.7 trains per day to 16.0 trains per day, an increase of 8.3 trains per day, or 108%” becomes “CPKC traffic will

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increase from 8.47 trains per day to 16.04 trains per day, an increase of 7.57 trains per day, 89%”

- Page 54, Footnote 192: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 7”
- Page 54, Footnote 193: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 7”
- Page 55, Footnote 194: “APP Vol. 2 at 337, OP Plan ¶ 231, Fig. 11” becomes “Am. OP Plan at 117, ¶ 287 & Fig. 11”
- Page 58: “more than eight trains per day” becomes “approximately eight trains per day”
- Page 60, Footnote 210: “APP Vol. 2 at 320, OP Plan ¶ 175” becomes “Am. OP Plan at 98, ¶ 231”
- Page 61: “Applicants plan to increase traffic on KCS’s Beaumont Subdivision from 8.9 trains per day to 19.64 trains per day, an increase of 11.4 trains per day, or 128%” becomes “Applicants plan to increase traffic on KCS’s Beaumont Subdivision from 8.67 trains per day to 19.64 trains per day, an increase of 10.97 trains per day, or 127%”
- Page 61, Footnote 213: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 7”
- Page 62: “Applicants plan to increase traffic on CP’s Kansas City Subdivision from 2.9 trains per day to 16.9 trains per day, an increase of 14 trains per day, or nearly 500%” becomes “Applicants plan to increase traffic on CP’s Kansas City Subdivision from 3.62 trains per day to 18.02 trains per day, an increase of more than 14 trains per day, or nearly 400%”
- Page 62, Footnote 221: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 5”
- Page 64: {{ [REDACTED] }}
- Page 64: “increase the number of trains moving through St. Paul, Minnesota, on CP’s River Subdivision, from 11.9 trains per day to 18.1 trains per day, an increase of 6.2 trains per day, or 52%” becomes “increase the number of trains moving through St. Paul, Minnesota, on CP’s River Subdivision, from 13.66 trains per day to 18.25 trains per day, an increase of 4.59 trains per day, or 34%”
- Page 64, Footnote 230: “APP Vol. 2 at 313, OP Plan ¶ 152” becomes “Am. OP Plan at 90, ¶ 208”
- Page 64, Footnote 231: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 2”

- Page 64, Footnote 232: “APP Vol 2. at 337, OP Plan ¶ 231, Fig. 11” becomes “Am. OP Plan at 116, ¶ 287, Fig. 11”
- Page 66, Footnote 235: “APP Vol. 2 at 306, OP Plan ¶ 133” becomes “Am. OP Plan at 72, ¶ 165”

II. Technical Amendments to Rocker/Turner Verified Statement:

- Page 15, Footnote 19 of Rocker/Turner VS: “APP Vol. 2 at 317, OP Plan ¶ 162” becomes “Am. OP Plan at 94–95, ¶¶ 217–219”
- Page 26, Footnote 34 of Rocker/Turner VS: “APP Vol. 2 at 340, 344, OP Plan ¶¶ 238, 244” becomes “Am. OP Plan at 120, 125, ¶¶ 294, 300”
- Page 27 of Rocker/Turner VS: “CPKC traffic will increase from 7.7 trains per day to 16.8 trains per day, an increase of 9.1 trains per day, or 118%” becomes “CPKC traffic will increase 7.94 trains per day to 16.25 trains per day, an increase of 8.31 trains per day, or 104%”
- Page 27, Footnote 35 of Rocker/Turner VS: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 7”
- Pages 27–28 of Rocker/Turner VS: “CPKC traffic will increase from 7.7 trains per day to 16.0 trains per day, an increase of 8.3 trains per day, or 108%” becomes “CPKC traffic will increase from 8.47 trains per day to 16.04 trains per day, an increase of 7.57 trains per day, or 89%”
- Page 28, Footnote 36 of Rocker/Turner VS: “APP Vol. 2 at 364 OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 7”
- Page 28, Footnote 37 of Rocker/Turner VS: “APP Vol. 2 at 337, OP Plan ¶ 231, Fig. 11” becomes “Am. OP Plan at 116, ¶ 287, Fig. 11”
- Page 30 of Rocker/Turner VS: “more than eight trains per day” becomes “more than seven trains per day”
- Page 33 of Rocker/Turner VS: “Applicants plan to increase traffic on KCS’s Beaumont Subdivision from 8.9 trains per day to 20.3 trains per day, an increase of 11.4 trains per day, or 128%” becomes “Applicants plan to increase traffic on KCS’s Beaumont Subdivision from 8.67 trains per day to 19.64 trains per day, an increase of 10.97 trains per day, or 127%”
- Page 33, Footnote 39 of Rocker/Turner VS: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 7”
- Page 34 of Rocker/Turner VS: “Applicants plan to increase traffic on CP’s Kansas City Subdivision from 2.9 trains per day to 16.9 trains per day, an increase of 14 trains per day, or nearly 500%” becomes “Applicants plan to increase traffic on CP’s Kansas City Subdivision from 3.62 trains per day to 18.02 trains per day, an increase of more than 14 trains per day, or nearly 400%”

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- Page 34, Footnote 40 of Rocker/Turner VS: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 5”
- Pages 34–35 of Rocker/Turner VS: “if CPKC operated nearly 17 trains per day over the line” becomes “if CPKC operated more than 18 trains per day over the line”
- Page 35 of Rocker/Turner VS: “will increase the number of trains moving through St. Paul on CP’s River Subdivision from 11.9 trains per day to 18.1 trains per day, an increase of 6.2 trains per day, or 52%” becomes “will increase the number of trains moving through St. Paul on CP’s River Subdivision from 13.66 trains per day to 18.25 trains per day, an increase of 4.59 trains per day, or 34%”
- Page 35, Footnote 41 of Rocker/Turner VS: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 2”
- Page 35, Footnote 42 of Rocker/Turner VS: “APP Vol. 2 at 337, OP Plan ¶ 231, Fig. 11” becomes “Am. OP Plan at 116, ¶287, Fig. 11”
- Page 37 of Rocker/Turner VS: “nearly twelve additional trains per day” becomes “nearly eleven additional trains per day”
- Page 37 of Rocker/Turner VS: “their 300% growth in traffic, from 7.1 trains per day to 21.6 trains per day” becomes “their nearly 200% growth in traffic, from 7.97 trains per day to 22.37 trains per day”
- Page 37, Footnote 43 of Rocker/Turner VS: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 6”
- Page 37, Footnote 44 of Rocker/Turner VS: “APP Vol. 2 at 275, OP Plan ¶ 49” becomes “Am. OP Plan at 59, ¶ 135”
- Page 37, Footnote 45 of Rocker/Turner VS: “APP Vol. 2 at 364, OP Plan, App. A at 1” becomes “Am. OP Plan, App. A at 5”

III. Technical Amendments to Haley Verified Statement:

- Page 5, Footnote 2 of Haley VS: “APP Vol. 2 at 283, OP Plan ¶ 76” becomes “Am. OP Plan at 42, ¶ 98”
- Page 7, Footnote 5 of Haley VS: “APP Vol. 2 at 295, OP Plan ¶ 109” becomes “Am. OP Plan at 61, ¶ 141”
- Page 7, Footnote 6 of Haley VS: “APP Vol. 2 at 311–12, OP Plan ¶¶ 148–49” becomes “Am. OP Plan at 88–89, ¶¶ 204–205”
- Page 7, Footnote 6 of Haley VS: “APP Vol. 2 at 311, OP Plan ¶ 147” becomes be “Am. OP Plan at 88, ¶ 203”

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- Page 7–8, Footnote 6 of Haley VS: “APP Vol. 2 at 296–99, OP Plan ¶¶ 112–16” becomes “Am. OP Plan at 62–65, ¶¶ 144–48”
- Page 8, Footnote 6 of Haley VS: “APP Vol. 2 at 423–24, OP Plan App. F” becomes “Am. OP Plan at 85–86, ¶¶ 197–99 & App. F”
- Page 8, Footnote 7 of Haley VS: “APP Vol. 2 at 300, OP Plan ¶ 120” becomes “Am. OP Plan at 67, ¶ 152”
- Page 7, Footnote 7 of Haley VS: “APP Vol. 2 at 298, OP Plan ¶ 114” becomes “Am. OP Plan at 64, ¶ 146”
- Page 7, Footnote 8 of Haley VS: “APP Vol. 2 at 297, OP Plan ¶ 112, Table 3” becomes “Am. OP Plan at 63, ¶ 144, Table 4”
- Page 9, ¶ 20 of Haley VS: “To put that number into perspective, 75 saved switch handlings is about 1/10th of the 1% of the 56,545 car handlings” becomes “To put that number into perspective, 75 saved switch handlings is about 1/10th of the 1% of the 65,890 car handlings”
- Page 9, ¶ 22 of Haley VS: “Applicants say that they will save 26 hours per car on transit time in Kansas City” becomes “Applicants say that they will save 24 hours per car on transit time in Kansas City”
- Page 9, Footnote 9 of Haley VS: “Applicants identify the number of ‘intermediate handlings’ under their base plan as 22.01 million annually” becomes “Applicants identify the number of ‘intermediate handlings’ under their base plan as 24.05 million annually”
- Page 9, Footnote 9 of Haley VS: “APP Vol. 2 at 287, OP Plan ¶ 86” becomes “Am. OP Plan at 50, ¶ 112, Table 3”
- Page 9, Footnote 10 of Haley VS: “APP Vol. 2 at 283, OP Plan ¶ 75” becomes “Am. OP Plan at 30, ¶ 72”
- Page 9, Footnote 11 of Haley VS: “APP Vol. 2 at 283, OP Plan ¶ 76” becomes “Am. OP Plan at 43, ¶ 98”
- Page 9, Footnote 12 of Haley VS: “APP Vol. 2 at 285, OP Plan ¶ 77” becomes “Am. OP Plan at 42, ¶ 99”
- Page 9, Footnote 13 of Haley VS: “APP Vol. 2 at 284–85, OP Plan ¶ 80, Table 1” becomes “Am. OP Plan at 44, ¶ 102, Table 2”
- Page 9, Footnote 13 of Haley VS: “APP Vol. 2 at 283, OP Plan ¶75 n.4” becomes “Am. OP Plan at 30–39, ¶¶ 72–81”
- Page 9, Footnote 13 of Haley VS: “Applicants appear to use a mix of CP’s 2019 traffic data and KCS’s 2020 traffic data to generate their operating statistics” becomes “Applicants combined traffic data for different years to generate their operating statistics”

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- Page 10, Footnote 14 of Haley VS: “APP Vol. 2 at 300, OP Plan ¶ 120” becomes “Am. OP Plan at 67, ¶ 152”
- Page 10, Footnote 15 of Haley VS: “APP Vol. 2 at 329, OP Plan ¶ 204” becomes “Am. OP Plan at 108, ¶ 260”
- Page 11, ¶ 26 of Haley VS: “It is especially clear in Table 3” becomes “It is especially clear in Table 4”
- Page 11, ¶ 26 of Haley VS: “In Table 3, the only exclusively CP location is Nahant at a scant 16.5 cars per day” becomes “In Table 4, the only exclusively CP location is Nahant at a scant 16.5 cars per day”
- Page 11, ¶ 26 of Haley VS: “This is less than 2% of the Table 3 changes” becomes “This is less than 2% of the Table 4 changes”
- Page 11, Footnote 19 of Haley VS: “APP Vol. 2 at 283, OP Plan ¶ 77” becomes “Am. OP Plan at 42, ¶ 99”
- Page 11, Footnote 20 of Haley VS: “APP Vol. 2 at 297, OP Plan ¶ 112, Table 3” becomes “Am. OP Plan at 63, ¶ 144, Table 4”
- Page 11, Footnote 21 of Haley VS: “OP Plan workpaper ‘HC – Cars Per Day by yard.docx’” becomes “Am. OP Plan workpaper ‘MREE Yard Activity Reports Summary’”
- Page 12, Footnote 22 of Haley VS: “APP Vol. 2 at 406–21, OP Plan App. C–E” becomes “Am. OP Plan, App. C–E”
- Page 13, Footnote 24 of Haley VS: “APP Vol. 2 at 419, OP Plan App. E” becomes “Am. OP Plan, App. E at 3”
- Page 13 Footnote 25 of Haley VS: “APP Vol. 2 at 311–12, OP Plan ¶¶ 148–49” becomes “Am. OP Plan at 88, ¶ 204”
- Page 13, Footnote 26 of Haley VS: “APP Vol. 2 at 338, OP Plan ¶ 234” becomes “Am. OP Plan at 118–19, ¶¶ 290–91”
- Page 15, Footnote 33 of Haley VS: “OP Plan work paper ‘1.Proposed Final FTI Rail to Rail Diversion Results for Merger Application_matching Finance with Truck to Rail.xlsx’” becomes “Am. OP Plan workpaper ‘1.Proposed Final FTI Rail to Rail Diversion Results for Merger Application_matching Finance with Truck to Rail 10_13_21’”
- Page 15, Footnote 34 of Haley VS: “OP Plan work paper ‘1.Proposed Final FTI Rail to Rail Diversion Results for Merger Application_matching Finance with Truck to Rail.xlsx’” becomes “Am. OP Plan workpaper ‘1.Proposed Final FTI Rail to Rail Diversion Results for Merger Application_matching Finance with Truck to Rail 10_13_21’”

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- Page 16, ¶ 40 of Haley VS: “Trains per day increase from 11 to 25 between Kansas City and Shreveport, and from 9 to 20 between Shreveport and Houston” becomes “Trains per day increase from 12 to 26 between Kansas City and Shreveport, and from 10 to 21 between Shreveport and Houston”
- Page 16, ¶ 40 of Haley VS: “Those are 127% and 122% increases, respectively—more than *doubling* the train traffic on these already busy routes” becomes “Those are 117% and 110% increases, respectively—more than *doubling* the train traffic on these already busy routes”
- Page 16, ¶ 42 of Haley VS: “Applicants’ growth plan seeks to approximately double KCS volumes on these segments in three years, to 19–20 trains per day on a base of 9–11 trains per day” becomes “Applicants’ growth plan seeks to approximately double KCS volumes on these segments in three years, to 18–21 trains per day on a base of 9–10 trains per day”
- Page 16, Footnote 36 of Haley VS: “*Compare* APP Vol. 2 at 452, OP Plan App. N, *with id.* at 454, OP Plan App. O” becomes “*Compare* Am. OP Plan at App. N, *with id.* at App. O”
- Page 16, Footnote 37 of Haley VS: “APP Vol. 2 at 337–44, OP Plan ¶¶ 231–44” becomes “Am. OP Plan at 116–121, ¶¶ 287–91”
- Page 16, Footnote 38 of Haley VS: “*Compare* APP Vol. 2 at 452, OP Plan App. N, *with id.* at 454, OP Plan App. O” becomes “*Compare* Am. OP Plan at App. N, *with id.* at App. O”
- Page 16, Footnote 39 of Haley VS: “OP Plan work paper ‘1.Proposed Final FTI Rail to Rail Diversion Results for Merger Application_matching Finance with Truck to Rail.xlsx’” becomes “Am. OP Plan workpaper ‘1.Proposed Final FTI Rail to Rail Diversion Results for Merger Application_matching Finance with Truck to Rail 10_13_21’”
- Page 17, ¶ 44 of Haley VS: “resulting in an increase of 21.3% in total car-miles and an increase of approximately 20% in gross ton-miles” becomes “resulting in an increase of 19.7% in total car-miles and an increase of approximately 20% in gross ton-miles”
- Page 17, ¶ 44 of Haley VS: “Yet total train miles will increase by only 11.6% compared to their *optimized* plan, and by only 7.4% compared to today’s operation” becomes “Yet total train miles will increase by only 7.4% compared to their *optimized* plan, and by 3.9% compared to today’s operation”
- Page 17, ¶ 44 of Haley VS: “Applicants say they will increase train hours by only 1.1% compared to their *optimized* plan, and actually *reduce* train-hours by 3.7” becomes “Applicants say they will increase train hours by only 1.4% compared to their *optimized* plan, and actually *reduce* train-hours by 3.5%”
- Page 17, ¶ 45 of Haley VS: “Applicants plan to handle approximately 20% more traffic with only 3.5% more car handlings” becomes “Applicants plan to handle approximately 20% more traffic with only 3.2% more car handlings”

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- Page 17, Footnote 41 of Haley VS: “APP Vol. 2 at 287, OP Plan ¶ 86, Table 2” becomes “Am. OP Plan at 50, ¶ 112, Table 3”
- Page 17, Footnote 42 of Haley VS: “APP Vol. 2 at 287, OP Plan ¶ 86, Table 2” becomes “Am. OP Plan at 50, ¶ 112, Table 3”
- Page 17, Footnote 43 of Haley VS: “APP Vol. 2 at 287, OP Plan ¶ 86, Table 2” becomes “Am. OP Plan at 50, ¶ 112, Table 3”
- Page 17, Footnote 44 of Haley VS: “APP Vol. 2 at 287, OP Plan ¶ 86, Table 2” becomes “Am. OP Plan at 50, ¶ 112, Table 3”
- Page 18, ¶ 46 of Haley VS: “Applicants reduced total car handlings by 1.8% from their base plan to their optimized plan” becomes “Applicants reduced total car handlings by 1.7% from their base plan to their optimized plan”
- Page 18, ¶ 46 of Haley VS: “driving up gross ton-miles and car miles on the CPKC network by 20% and 21.3%, respectively” becomes “driving up gross ton-miles and car miles on the CPKC network by 19.8 and 19.7%, respectively”
- Page 18, ¶ 48 of Haley VS: “Yet, they say car handlings on the combined network will increase over the base plan level by just 1.6%” becomes “Yet, they say car handlings on the combined network will increase over the base plan level by just 1.5%”
- Page 18, ¶ 48 of Haley VS: “Applicants project accommodating network-wide growth of approximately 20% with 1.6% more car handlings” becomes “Applicants project accommodating network-wide growth of approximately 20% with 1.5% more car handlings”