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June 15, 2022

Via E-Filing

Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
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*

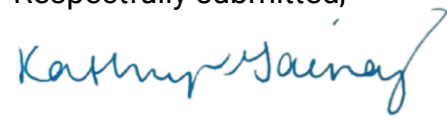
Dear Ms. Brown:

The U.S. rail operating subsidiaries of Canadian National Railway Company (collectively, “CN”) respectfully submit the service data for week 23 and employment data for the month of May pursuant to the Board’s order served on May 6, 2022, in the above-captioned docket. CN is using the revised template received from STB staff on June 14, 2022, for its employment reporting.

CN is also submitting a revised methodology document for its service reporting. The methodology document reflects a change relating to reporting Metric 3(iv), which, under the May 6 order, is “the weekly average number of car miles per day.” On June 3, 2022, Board staff requested that CN modify its reporting for that metric. CN will now report the average number of car miles traveled per day by car ownership type, based on CN’s Car Velocity System. In addition, CN was asked to resubmit service data for Metric 3(iv) for prior weeks 19 through 22, and CN is voluntarily providing that information.

Finally, CN is submitting updated employment data for Metric 8 for the month of April 2022, which adds information related to the employees of The Pittsburgh & Conneaut Dock Company, as indicated in CN’s letter dated May 25, 2022.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kathryn J. Gaaney", with a long, sweeping flourish extending from the end.

Kathryn J. Gaaney

Attachments

CC: service.recovery@stb.gov (including the files in CSV format)

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

June 15, 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 (iv), CN is providing average number of car miles traveled per day by car ownership type.

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).