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BEFORE THE
SURFACE TRANSPORTATION BOARD

STB Ex Parte No. 769

URCS DATA REPORTING

REPLY COMMENTS OF THE ASSOCIATION OF AMERICAN RAILROADS

The Association of American Railroads respectfully submits these reply comments in response to the April 29, 2022 notice of proposed rulemaking of the Surface Transportation Board to collect data from the railroad industry for use in the Uniform Railroad Costing System (“URCS”).¹ On June 13, 2022, AAR filed opening comments in support of the proposal, with one modification and one clarification.² The only other entity to file comments was the Western Coal Traffic League (“WCTL”).³ In general, the AAR reiterates its overall support for the proposal, but files these reply comments to address one matter raised by WCTL.

AAR’s comments explained that AAR will submit tare weight and loss and damage data on behalf of all Class I’s, including the Canadian railroads’ U.S. operating subsidiaries.⁴ As the Board notes, AAR has voluntarily collected and provided tare weight and loss and damage data for decades to the Board in an aggregated form.⁵ While the Notice proposes that individual

¹ Notice of Proposed Rulemaking, *URCS Data Reporting*, EP 769 at 1 (STB served Apr. 29, 2022) (“Notice”).

² See AAR Comments, *URCS Data Reporting*, EP 769 (June 13, 2022) (“AAR Comments”).

³ See WCTL Comments, *URCS Data Reporting*, EP 769 (June 13, 2022) (“WCTL Comments”).

⁴ See AAR Comments at 3-4.

⁵ Notice at 2-3.

railroads may provide the data individually, it leaves the option available for Class I railroads to continue to provide tare weight and loss and damage data through AAR.⁶

WCTL, however, suggests that the Board should require the information be provided at the individual carrier level only. There are good reasons to maintain the Notice's two options. First, providing the information in the aggregate through AAR is more efficient for the Board. As it has for decades, AAR will collect, calculate, and aggregate the data for the Board. Requiring the railroads to provide the data individually will necessarily mean the Board will have to collect, calculate, and aggregate the data for URCS, utilizing valuable staff time and resources.

Second, the intent of the data collection is for use in URCS, which is the industry-wide, uniform system for railroad costing. The purpose of URCS is to generate system-averages—in other words, aggregated data. In suggesting the Board require the data be collected only individually, WCTL admits its alternative motive for its proposal—the collection of data to monitor railroad operating practices.⁷ That is simply not the purpose of this data collection.⁸ The Board should reject WCTL's suggestion and maintain the Notice's two options for submitting the tare weight and loss and damage data.

⁶ Notice at 3.

⁷ WCTL Comments at 3 (suggesting that higher loss and damage for one carrier might indicate “unsound adoption of Precision Scheduled Railroading principles”).

⁸ See Notice at 15 (in describing the need and use of the collection, “[t]his collection will be used by the Board in the Uniform Railroad Costing System (URCS).”).

Conclusion

AAR reiterates its support of the Board's proposal with the modification and clarification suggested in its opening comments.

Respectfully submitted,



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