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American Association of
Grain Inspection and Weighing
Agencies

June 29, 2022

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U.S. Surface Transportation Board
395 E Street, SW
Washington, DC 20423

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Office of Proceedings
June 29, 2022
Part of
Public Record

IN RE: STB Docket EP 770
Urgent Issues in Freight Rail Service – Railroad Reporting

Dear Sirs:

The American Association of Grain Inspection and Weighing Agencies (AAGIWA) hereby submits comments urging that rail carriers be directed to provide more timely information on shuttle train arrivals. AAGIWA represents those businesses (both publicly and privately owned) who provide official grain inspection and weighing services in domestic commerce.

The lack of reliable information from rail carriers on the arrival times of shuttle trains creates an undue hardship on our members. The current unpredictable nature of shuttle arrivals result in inspection crews being placed “on call” for long hours before they actually report to work. This lack of accurate and dependable information creates disruptions in our industry’s ability to hire and retain staff. We see annual turnover rates in some cases of over 40 percent, with two-thirds of those exiting who cite unpredictable works schedules as a reason to leave the job.

We ask the STB to implement the following steps that would result in rail carriers providing more accurate arrival times:

- Direct rail carriers to implement shuttle train tracking with real time data to provide to grain elevators and other customers, allowing them a more accurate snapshot for predicting train arrivals (thus proper personnel scheduling). This should be in a common and easily recognizable format across all railroad operators.
- Direct rail carriers to provide complete power, staffing and movement plans for all shuttle movements into a facility. This should include expected daily movement by milestone including crew/power limitations, maintenance windows and congestion delays. This should already be occurring by the railroads in how they arrive at an expected arrival date/time to provide to customers but is kept internal to the railroad so any divergence from the plan is not known by the customer until the railroad provides an update, typically daily. This should be in a common and easily recognizable format across all railroad operators.
- Implement penalties against the railroad to the customer for shuttle arrival times varying by 6 hours or more in the final 24 hours of estimated arrival. These penalties would incentivize the railroads to accurately predict and perform while also providing compensation to the grain

P.O. Box 26426
Kansas City, MO 64196
Phone (816) 447-1105
www.aagiwa.org

companies and inherently their support service staff (such as grain inspectors) for additional on call hours and relief workers.

- Implement automatic adjustments to the spot times for shuttles arriving to customers with a variance of 6 hours or more against the final 24 hours of estimated arrival. This will allow for grain companies and their support service staff (such as grain inspectors) to be released from on-call status and compensated as they await a train's arrival while allowing a necessary rest period until a known time (next day/morning), without penalty or loss of incentive to the grain company for the delayed loading/release of the train.

We appreciate your consideration of our request.

Respectfully,

A handwritten signature in black ink that reads "Brent Hibbets". The signature is written in a cursive, flowing style.

Brent Hibbets
President