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306559

April 27, 2023

Mr. William Brennan
ATTN: Alexander Dusenberry
Office of Economics
Surface Transportation Board
395 E. Street SW
Washington, DC

ENTERED
Office of Proceedings
May 4, 2023
Part of
Public Record

I am writing you to request access to the confidential waybill sample under 49 CFR 1244.9 (c) Other Users, in support of research being conducted by contractor WSP on behalf of the Lehigh Valley Planning Commission/Lehigh Valley Transportation Study Metropolitan Planning Organization (LVPC). I am the Executive Director. This study is being advanced by the Eastern Pennsylvania Freight Alliance, a consortium that includes LVPC, the Reading Area Transportation Study (RATS), Lebanon County Metropolitan Planning Organization (LEBCO MPO), Lackawanna/Luzerne MPO, and Northeastern Pennsylvania Alliance (NEPA). I am requesting this data on behalf of the Alliance and its partner agencies.

The data is to be applied to the Eastern Pennsylvania Freight Infrastructure Plan to comply with various federal regulations for metropolitan planning organizations, including understanding rail activity in the region, the markets railways connect to and interconnectivity of freight modes. The Federal Highway Administration's Freight Analysis Framework (FAF) data is unable to cover rail volumes at a granular enough detail to facilitate regional analysis of rail, so a more detailed source is being sought. Public versions of the Surface Transportation Board Waybill are too aggregate and suppressed to enable rigorous analysis of localized rail movements and their role in the local economy, necessitating this request.

The critical variables needed are as follows:

- Origin - Destination County region sufficient to cover freight activity in and around:
 - o Lehigh County, Pennsylvania
 - o Northampton County, Pennsylvania
 - o Berks County, Pennsylvania
 - o Lebanon County, Pennsylvania
 - o Carbon County, Pennsylvania
 - o Schuylkill County, Pennsylvania
 - o Monroe County, Pennsylvania
 - o Pike County, Pennsylvania
 - o Lackawanna County, Pennsylvania
 - o Luzerne County, Pennsylvania

- Expanded tonnage
- International harmonized system code/ STCC commodity classification
- Year-1 year (2021): sufficient for understanding volumes of rail activity

We are requesting access to the masked data to try and represent the most accurate depiction of goods movement as possible without unnecessary detail involving sensitive cost/price. The data itself would not be published - any results stemming from the analysis would not be circulated subject to any concerns you might have on divulging information in accordance with the requirements of Title 49 USC §1244 of the Surface Transportation Board.

The names and contact information of staff who will be utilizing this data are:

- Stephen Chiaramonte, WSP
- Sebastian Guerrero, WSP
- Shashank Pulikanti, WSP
- Patrick Osei, LVPC
- David Jan, LVPC
- Brian Hite, LVPC

Thank you in advance as the data is crucial to our transportation planning efforts. If you have any questions I may be reached at (610) 264-4544 or bbradley@lvpc.org. You may also contact our consultant team Project Manager, Stephen Chiaramonte, at (609-) 865-3930 or s.chiaramonte@wsp.com.

Sincerely,



Becky A. Bradley, AICP
Executive Director, Lehigh Valley Planning Commission
Secretary, Lehigh Valley Transportation Study

