

PUBLIC VERSION – REDACTED – TO BE PLACED ON PUBLIC FILE

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PUBLIC VERSION

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VIA E-FILING

Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. NOR 42175, Complaint and Petition of the National Railroad Passenger Corp. under 49 U.S.C. § 24308(f) for Substandard Performance of Amtrak's Sunset Limited Trains 1 and 2

Dear Ms. Brown:

Enclosed for e-filing in the above-referenced proceeding is a Public version of BNSF's Appendix A—Part IV submission, with appropriate redactions that the Board can place in its docket. We are concurrently filing a highly confidential version of the submission to be filed under seal.

The entire Public version has been stamped with a page header stating "PUBLIC VERSION – REDACTED – TO BE PLACED ON PUBLIC FILE". A slip sheet has been inserted indicating the pages that have been redacted from the Public version. The redacted pages include BNSF-SUNSET-0002273 to BNSF-SUNSET-0004952.

Please contact me with any questions.

Respectfully submitted,

/s/ Peter W. Denton

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BEFORE THE
SURFACE TRANSPORTATION BOARD

DOCKET NO. NOR 42175

COMPLAINT AND PETITION OF THE NATIONAL RAILROAD
PASSENGER CORP. UNDER 49 U.S.C. § 24308(f) FOR SUBSTANDARD
PERFORMANCE OF AMTRAK'S SUNSET LIMITED TRAINS 1 AND 2

BNSF'S RESPONSE TO THE BOARD'S INTERROGATORIES AND
DOCUMENT REQUIREMENTS; APPENDIX A – PART IV

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Dated: September 25, 2023

**BNSF’S RESPONSE TO THE BOARD’S INTERROGATORIES AND
DOCUMENT REQUIREMENTS; APPENDIX A – PART IV**

Pursuant to the Surface Transportation Board’s (“Board”) July 11, 2023 Decision (“*Decision*”), BNSF Railway Company (“BNSF”) hereby provides the information sought in Appendix A – Part IV of the *Decision*.

REQUEST NO. 1: Sharing arrangements. *Regarding each segment of the Line in which your company shares ownership, operation, dispatching, maintenance, and/or other responsibilities with one or more other railroads, provide a detailed explanation of the division of responsibilities among the carriers during the relevant period.*

RESPONSE TO REQUEST NO. 1: The *Sunset Limited* operates along an approximately 1,997-mile route between New Orleans, Louisiana and Los Angeles, California. BNSF and Union Pacific Railroad Company (“UP”) are the joint owners of the “50/50 Line,” a portion of the Route between Live Oak, La. (MP C14.95) and Dawes, Tex. (MP E353.0). BNSF and UP each operate over the entire 50/50 Line. As discussed further below in response to Request No. 30, BNSF and UP jointly dispatch the 50/50 Line from a dispatching center in Spring, Tex.

While BNSF and UP jointly own, operate, and dispatch the 50/50 Line, BNSF and UP have divided the line into two segments for the purposes of certain responsibilities. The eastern segment of the 50/50 Line extends east-to-west from Live Oak, La. (MP C14.95) to Iowa Junction, La. (MP C205.4). The western segment of the 50/50 Line extends east-to-west from Iowa Junction, La. (MP C205.4) to Dawes, Tex. (MP E353.0). On the approximately 200 mile-long eastern segment, referred to as BNSF’s Lafayette Subdivision, BNSF is responsible for maintenance, BNSF joint dispatchers have primary dispatching responsibility (described further below in response to Request No. 30), and BNSF serves as the host railroad for

Amtrak's *Sunset Limited* service.¹ On the western segment, UP is responsible for maintenance, UP joint dispatchers have primary dispatching responsibility, and UP serves as the host railroad for Amtrak's *Sunset Limited* service.

REQUEST NO. 2: Delay causes. *To the extent that you track Amtrak and/or freight train delays and their causes, explain the process(es) for gathering, categorizing, recording, and storing train delay causes. Provide all relevant standard operating procedures, employee training manuals, guidelines, instructions, and other relevant material.*

RESPONSE TO REQUEST NO. 2: BNSF has a number of metrics that it uses to regularly assess the health of its network. These metrics include velocity, dwell times, on time performance ("OTP"), maintenance window compliance, slow orders, average train speed, active inventory per load, intermodal transit hours, unit miles per day, coal loading per day, car cycle, inventory turnover, trains per day, cars arrived, classified, and departed per day by terminal, train miles, gross-ton miles, unit miles, train starts, and trains held. BNSF publishes various key performance indicator scorecards to track its successes and focus on specific operational opportunities for improvement. BNSF has a rigorous process to quickly address any circumstances that negatively impact the railroad's performance.

Additionally, BNSF actively monitors Amtrak train delays and their causes, including by reviewing Amtrak delay codes in certain circumstances. When Amtrak trains encounter a delay, the Amtrak conductor records the event and attributes its cause to one of several delay codes. Amtrak then sends to BNSF the raw delay data

¹ Louisiana & Delta Railroad also operates pursuant to overhead trackage rights on this BNSF-hosted segment between LDRR RR JCT (Raceland) (MP C41.2) to Iowa Junction, La. (MP C205.3).

recorded by Amtrak conductors through an Electronic Data Interchange (“EDI”) feed.

Review of delay codes is a laborious manual task and Amtrak generates a large volume of delay data even for on-time trains. Therefore, BNSF typically reviews delay codes when there is a service disruption, or when the delays impact BNSF’s performance in connection with the OTP metric set out in the Amtrak/BNSF Operating Agreement² (“Contractual OTP”). Contractual OTP measures delays within BNSF’s control and has long been used to determine significant financial components of the Amtrak/BNSF Operating Agreement.

If BNSF did not meet the Contractual OTP standards with respect to a specific train or train segment, the BNSF Passenger Operations Team will work with other BNSF operating teams to investigate an Amtrak-recorded delay and determine a root cause. This investigation may result in BNSF disagreeing with Amtrak’s delay coding. For example, BNSF may determine that the root cause of an Amtrak delay was congestion from a drawbridge opening rather than simply freight train interference (“FTI”). BNSF then has the ability to contest the disputed delay coding with Amtrak.

The Federal Railroad Administration (“FRA”) reports disputed “Host-Railroad Responsible Train Delay Minutes” in its Quarterly Report on the Performance and Service Quality of Intercity Passenger Train Operations. BNSF understands that the “Disputed Delay Minutes” in these quarterly reports capture those instances where BNSF has challenged a delay coding using the process described above, but where Amtrak has refused to revise the delay coding. Because

² The “Amtrak/BNSF Operating Agreement” is the Agreement between National Railroad Passenger Corporation and Burlington Northern Railroad Company and the Atchison, Topeka and Santa Fe Railway Company, dated September 1, 1996.

BNSF tends to review the small subset of Amtrak-recorded delay codes that affect Contractual OTP, and because Amtrak often revises the delay codes when BNSF raises a dispute, these FRA reports are necessarily limited in scope.

REQUEST NO. 3: Train scheduling process. *Produce all standard operating procedures, employee training manuals, guidelines, instructions, and other relevant material that explain your train scheduling process. To the extent that any portion of the scheduling process is computerized, provide an explanation of the rule(s)/algorithm(s) programmed.*

RESPONSE TO REQUEST NO. 3: BNSF uses a Transportation Service Plan (“TSP”) to designate how individual trains should operate in any particular geographic area on BNSF’s network. The TSP is a timetable that includes the schedules for each train in the particular area. Each train on a TSP has a Base Train Schedule and an Active Train Schedule, as described further below. BNSF uses a computer application, Transportation Support System (“TSS”), to maintain or edit Base Train Schedules and Active Train Schedules. The scheduling process itself is not, however, automated by TSS. Instead, BNSF’s Service Design & Performance Team creates a Base and Active Train Schedule for each train. Each train is designated in the TSP by a train identifier (“train ID”).³

Base Train Schedules. A Base Train Schedule is a skeleton of the train operating plan and defines all rules governing how a train is scheduled to be run.⁴ It lists the stations any given train will travel through, the arrival and departure day

³ See SS 101 Design Training slide deck at BNSF-SUNSET-0002972.

⁴ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004931.

of week/times, passing points, refueling points, crew change locations, etc.⁵ It does not contain actual calendar dates, but has the days of the week that the train is to be run.⁶ A TSP for any particular geographic area contains all Base Train Schedules for the trains operating in that area. On the TSP page for Base Train Schedules, trains are depicted by train IDs that consist of train type, symbol, section, schedule ID, and alternate schedule, *e.g.*, H-BARGAL9-A1.⁷

To build the Base Train Schedule, the BNSF Service Design Team designs a scenario based upon data, observed trends, and customer or field requests.⁸ The Service Design Team then tests the impact of the scenario with the affected field teams to determine if the scenario will work.⁹ If, after testing, a change is agreed upon, it is then activated and becomes the base schedule.¹⁰

Active Train Schedule. In contrast to a Base Train Schedule, an Active Train Schedule is the actual train operating plan. It is copied from the Base Train Schedule or from another Active Train Schedule.¹¹ Active Train Schedules “exist for [seventeen] days into the future for Base Trains that have Day of Week service.”¹²

⁵ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004931.

⁶ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004914.

⁷ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004931.

⁸ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004932.

⁹ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004932.

¹⁰ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004932.

¹¹ See SS 101 Design Training slide deck at BNSF-SUNSET-0002985.

¹² See SS 101 Design Training slide deck at BNSF-SUNSET-0002985.

The Active Train Schedule contains actual calendar dates with scheduled estimated times of departure and arrival. As train events are reported, the times are updated.¹³ On Active Train Schedules, train IDs are made up of train type, symbol, section, day and priority, *e.g.*, M-MISLAU1-06A.

Service Design Team. The Service Design Team is assigned the following responsibilities: (1) designing schedule networks according to volume, capacity, and the needs of BNSF customers; (2) balancing the schedule needs with Division/Terminal specific constraints; (3) maintaining service groups of customers based on interactions with the Operating Team; and (4) interacting with other departments at BNSF for “common-contact” with regard to the service plan.¹⁴

BNSF tasks the Service Design Team with creating both the Base Train Schedule and the Active Train Schedule for any particular train. Within the Service Design Team is the Assistant Vice President of Merchandise and the Assistant Vice President of Bulk Operations.¹⁵ Beneath the Assistant Vice Presidents are the various Directors of Service Design by Region (*e.g.*, North Region, South Region, *etc.*).¹⁶ Those Directors, “look[] for opportunities to make the operation on the division more efficient.”¹⁷

To fulfill these responsibilities, the Service Design Team operates in both strategic and tactical roles when creating the Base and Active Train Schedules.

¹³ See SS 101 Design training slide deck at BNSF-SUNSET-0002985.

¹⁴ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004920.

¹⁵ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004916.

¹⁶ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004917.

¹⁷ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004918.

That team identifies any trends that conflict with the current TSP, runs hypothetical scenarios against the Base Train Schedule to identify efficiency opportunities and gaps, resolves trip plan failures, and responds to service interruptions.¹⁸

Software Applications. As discussed above, BNSF’s scheduling process during the Relevant Period was not computerized, but certain software applications assisted the Service Design Team during the scheduling process. TSS software is used to build and modify the Base and Active Train Schedule in a digitized format.¹⁹

Another program, Enhanced Service Design Studio (“ESD”), compares a current TSP to a proposed TSP and reflects any impacts to train movement and arrival/departure times based on changes to the TSP.²⁰ ESD uses data from the past twenty-eight days to run various simulations using the base and scenario TSP data. ESD then calculates, “miles, volume, crews, handling, locomotive utilization, etc.”²¹ The Service Design Team submits various “Objectives” as inputs into the program and ESD annualizes the cost impact of those new inputs.²² The “Objectives” represent trains eliminated from the schedule, trains added to the schedule, and

¹⁸ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004921.

¹⁹ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004925.

²⁰ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004926.

²¹ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004926.

²² See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004926.

modifications to the TSP.²³ The Service Design Team also uses Visual Train Scheduler, a visual mapping tool that depicts the train routes and “identifies key TSP attributes like crew change points, refueling points, inspections, etc.”²⁴

In response to this Request, BNSF is producing the following collection of materials that illustrates the life cycle of any given BNSF train schedule, which begins and ends with BNSF’s Service Design Team:

- ATJS [Active Schedule] System Appreciation Document (BNSF-SUNSET-0003223),
- BTJS [Base Schedule] System Appreciation Document (BNSF-SUNSET-0003268),
- Train Schedule Life Cycle (BNSF-SUNSET-0003315),
- Train Origination Request (TOR) Handbook (BNSF-SUNSET-0003160),
- Crew Map (BNSF-SUNSET-0002960),
- ESD Training Manual (BNSF-SUNSET-0003307),
- Extra Merchandise Instructions, dated July 24, 2014 (BNSF-SUNSET-0003312),
- BNSF Service Design Team FLS Technology Day – SD 101 addendum, dated June 3, 2019 (BNSF-SUNSET-0004912),
- SS 101 Design Training slide deck (BNSF-SUNSET-0002969),
- Service Design Studio – ESD/IBO/ITO slide deck, dated March 2012 (BNSF-SUNSET-0003198),
- TJSREQ for ReRoute via Xpress (BNSF-SUNSET-0003071),
- TJSREQ for SCH EXT via Xpress (BNSF-SUNSET-0003074), and
- Dispatcher Leadership Workshop, dated April 12, 2022 (BNSF-SUNSET-0002961).

²³ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004926.

²⁴ See BNSF Service Design Team, FLS Technology Day – SD 101 addendum slide deck at BNSF-SUNSET-0004927.

REQUEST NO. 4: Sunset Limited Schedule. Describe your role in creating the schedule skeleton. Identify any parts of the current schedule skeleton with which you disagree and explain why you disagree.

RESPONSE TO REQUEST NO. 4: The *Sunset Limited* Schedule for Trains 1 and 2 has been in place for many years. Any adjustments to the Schedule have been minor. BNSF has agreed to those changes.

REQUEST NO. 5: Certified schedules. Explain why no “certified schedule” (as defined by 49 C.F.R. § 273.3) has been created for Train 1 or Train 2.

RESPONSE TO REQUEST NO. 5: Amtrak schedule certification occurs on a host-by-host basis. BNSF has certified its portion of the existing schedules for Amtrak’s *Sunset Limited* Trains 1 and 2. Consistent with the FRA’s rule regarding schedule certification, BNSF has not been involved in the certification process between Amtrak and other host railroads on this Route.

REQUEST NO. 6: Proposed revised schedules using current scheduled run time. Provide all schedules proposed to Amtrak after December 16, 2020, that use either the current overall scheduled running time of the trains or a lesser amount of run time.

RESPONSE TO REQUEST NO. 6: BNSF does not have any documents responsive to this Request, as it has not proposed any revised schedules to Amtrak after December 16, 2020.

REQUEST NO. 7: Proposed revised schedules that are greater than the current scheduled run time. Provide all schedules proposed to Amtrak after December 16, 2020, that extend the overall scheduled running time of the trains beyond the current overall schedule run time.

RESPONSE TO REQUEST NO. 7: BNSF does not have any documents responsive to this Request, as it has not proposed any revised schedules to Amtrak after December 16, 2020.

REQUEST NO. 8: Train schedules. *Produce all schedules and operating plans that you had for freight operations using the portion(s) of the Sunset Limited's route that you hosted, owned, operated, dispatched, served, or leased during the Relevant Period, and the dates such schedules and plans were in effect. To the extent practicable, provide these in a machine-readable format.*

RESPONSE TO REQUEST NO. 8: BNSF's response to Request No. 3 discusses how BNSF creates and maintains its Base and Active Train Schedules for individual trains. In response to Request No. 8, BNSF is producing two documents that contain the Base Train Schedules and Active Train Schedules for BNSF trains operating via the Iowa Junction, Louisiana control point during the Relevant Period (with days of service active between October 1, 2021 and December 8, 2022):

- IOWJCT Base Sch 2021-10-01 to 2022-12-08 (BNSF-SUNSET-0004951); and
- IOWJCT Act Sch 2021-10-01 to 2022-12-08 (BNSF-SUNSET-0004952).

REQUEST NO. 9: Scheduling and Amtrak. *When scheduling freight trains, what steps are taken to avoid conflicts with the Sunset Limited?*

RESPONSE TO REQUEST NO. 9: BNSF's response to Request No. 3 discusses generally how BNSF schedules its trains. Amtrak's departure and arrival times are the foundation of BNSF's scheduling process for the *Sunset Limited*. As discussed more fully below in response to Request No. 22, BNSF uses a hierarchy of priorities for each train that runs on its system. The first step in the scheduling process is to create a Base Train Schedule for each individual train. When building

a Base Train Schedule for any particular train, the priority of the train plays a key role. Because Amtrak trains have the highest priority, the schedule is built to preserve Amtrak's requested departure and arrival times. The Base Train Schedules for all non-passenger trains are built around Amtrak's departure and arrival times, so as to not impact them. As a result, BNSF's TSP is made up of Base Train Schedules that are designed to prioritize Amtrak.

BNSF works to avoid any freight movements on the BNSF Lafayette Subdivision that would conflict with or delay the *Sunset Limited*, although much of the freight traffic introduced to the BNSF Lafayette Subdivision is impacted by the timing of hand-offs from other carriers on the western and eastern ends of the Subdivision. Furthermore, BNSF intentionally schedules maintenance operations (both routine and major capital projects) when it would least disrupt Amtrak operations.

Even during unforeseen events, BNSF has collaborative procedures in place to accommodate and prioritize passenger trains. After receiving a notification of an unanticipated event, BNSF communicates with Amtrak to allow Amtrak to alert its operations and passengers. Amtrak and BNSF collaborate on contingency plans to minimize passenger disruption. If passenger trains are adjusted or detoured, BNSF will modify freight trains schedules accordingly. If Amtrak's departure time changes, BNSF dispatchers make best efforts to adjust freight train schedules to prioritize Amtrak. Accommodating Amtrak in this scenario is a collaborative process among multiple BNSF operating units, including BNSF's Passenger Operations Team, BNSF's Network Operations Center ("NOC", discussed further below) and division leadership in the field, as well as Amtrak personnel.

REQUEST NO. 10: Unscheduled trains. Describe your protocols for introducing unscheduled trains onto your rail system.

RESPONSE TO REQUEST NO. 10: BNSF's network contains a mix of "scheduled" and "unscheduled" freight trains. For BNSF, the main difference between these two types of trains is the timing of when a train becomes scheduled. The Base Train Schedule (discussed further above in response to Request No. 3) for a "scheduled" train lists the specific times and days of week that the train will operate.²⁵ "Unscheduled" trains operate similarly to the scheduled network, but they may not operate at the same time each day or week. Instead, "unscheduled" trains run as necessary to meet customer demand and operate "as needed," often in a cycle between fixed origin and destination points.²⁶ While these trains may be referred to as "unscheduled," they are routine and frequent.

There are two typical ways for an unscheduled train to become scheduled on BNSF's network. First, an unscheduled train can become a scheduled train based on normal cycling from an inbound train nearing destination to "bounce" back to its original origin after loading/unloading. An example of this would be a coal unit train that cycles from the mine to the destination. Second, the scheduling process for an unscheduled train can begin when a customer submits a train request through the Train Origination Request ("TOR") interface. The TOR system allows customers to submit and manage train requests.²⁷ To request a train, a user

²⁵ These scheduled trains are often "merchandise" or intermodal trains. A merchandise train is a freight train transporting freight other than bulk goods and can be made up of mixed railcars (box cars, tank cars, etc.).

²⁶ These "unscheduled" trains are often comprised of bulk commodities such as coal, grain, rock, crude, etc.

²⁷ See Train Origination Request (TOR) Handbook at BNSF-SUNSET-0003162. Using TOR, customers can: (1) view status and up-to-date information on all train requests; (2) access a historical view of train requests; and (3) access up-to-date information on train requests including symbol and permit information. *Id.*

provides certain inputs, including the train's origin, destination, and volume.²⁸ The TOR system then sends a notification to BNSF that a new train has been requested.²⁹

BNSF regularly assigns unscheduled trains active status and incorporates them into the existing schedule for any particular BNSF geographic region (the TSP described more fully above in the response to Request No. 3). The introduction of previously unscheduled trains onto BNSF's network has no effect on BNSF's prioritization of Amtrak trains. The Service Design Team, during ordinary operating conditions, incorporates those trains into the existing TSP so as to not impact Amtrak's arrival and departure times.

REQUEST NO. 11: Maps. *Produce a clear, detailed map or set of maps of the portion(s) of the Sunset Limited that you host, own, operate, dispatch, serve, or lease, which were in effect during the Relevant Period, as well as the most current version(s) if the map(s) have been updated since the Relevant Period. You must produce a map in a static format such as a PDF, but also, if available, produce a computer-readable version in a format such as a .kml, .kmz, or ESRI shapefile file type. These map(s) should identify:*

- a. Mileposts (following the Uniform Milepost Numbers described in Part II of this appendix).*
- b. Subdivision.*
- c. Stations (as defined in the "definitions" section of this Appendix).*
- d. Where your involvement with the Sunset Limited begins and ends.*
- e. Single-track territory with mileage identified.*
- f. Double-track territory with mileage identified.*
- g. Passing sidings on single-track territory, including the length of each siding.*

²⁸ See Train Origination Request (TOR) Handbook at BNSF-SUNSET-0003163.

²⁹ See Train Origination Request (TOR) Handbook at BNSF-SUNSET-0003163.

h. Passing sidings on double-track territory, including the length of each siding.

RESPONSE TO REQUEST NO. 11: In response to this Request, BNSF is producing maps with the requested information both in PDF (BNSF-SUNSET-0002260) and ESRI shapefile format (filed in native format).

REQUEST NO. 12: Track charts. *Submit all track charts for portion(s) you host, own, operate, dispatch, serve, or lease of the Sunset Limited, which were in effect during the Relevant Period, as well as the most current version(s) if the map(s) have been updated since the Relevant Period.*

RESPONSE TO REQUEST NO. 12: In response to this Request, BNSF is producing fifteen track charts, dated October 12, 2021 through December 9, 2022, with the most current version dated June 27, 2023. Those track charts are located at:

- BNSF-SUNSET-0002519 (October 12, 2021);
- BNSF-SUNSET-0002582 (November 19, 2021);
- BNSF-SUNSET-0002645 (December 1, 2021);
- BNSF-SUNSET-0002708 (January 12, 2022);
- BNSF-SUNSET-0002771 (February 23, 2022);
- BNSF-SUNSET-0002834 (March 16, 2022);
- BNSF-SUNSET-0002897 (April 11, 2022);
- BNSF-SUNSET-0003316 (May 25, 2022);
- BNSF-SUNSET-0003379 (July 6, 2022);
- BNSF-SUNSET-0003442 (August 5, 2022);
- BNSF-SUNSET-0003505 (August 30, 2022);
- BNSF-SUNSET-0003568 (September 14, 2022);
- BNSF-SUNSET-0003631 (October 28, 2022);
- BNSF-SUNSET-0003694 (December 9, 2022); and
- BNSF-SUNSET-0002456 (June 27, 2023).

REQUEST NO. 13: Employee Timetables. *Produce all Employee Timetables, general orders, general track bulletins and special instructions for portion(s) you host, own, operate, dispatch, serve, or lease of the Sunset Limited, which were in effect during the Relevant Period, as well as the most current version(s) if the map(s) have been updated since the Relevant Period. This includes all train handling instructions and fuel conservation instructions.*

RESPONSE TO REQUEST NO. 13: In response to this Request, BNSF is producing two Employee Timetables:

- 0800 Central Continental Time from April 22, 2020 – April 19, 2022 (BNSF-SUNSET-0002274); and
- 0800 Central Continental Time from April 27, 2022 – July 11, 2023 (BNSF-SUNSET-0002360).

BNSF is also producing four System General Orders:

- BNSF-SUNSET-0002226 dated July 28, 2022;
- BNSF-SUNSET-0000481 dated September 28, 2022;
- BNSF-SUNSET-0002220 dated November 23, 2022; and
- BNSF-SUNSET-0002244 dated November 23, 2022.

BNSF is also producing fifteen System Special Instructions in effect from August 4, 2021 – December 1, 2022:

- BNSF-SUNSET-0000827;
- BNSF-SUNSET-0000893;
- BNSF-SUNSET-0000959;
- BNSF-SUNSET-0001025;
- BNSF-SUNSET-0001091;
- BNSF-SUNSET-0001157;
- BNSF-SUNSET-0001353;
- BNSF-SUNSET-0001421;

- BNSF-SUNSET-0001489;
- BNSF-SUNSET-0001687;
- BNSF-SUNSET-0001757;
- BNSF-SUNSET-0001824;
- BNSF-SUNSET-0001891;
- BNSF-SUNSET-0001958; and
- BNSF-SUNSET-0002153.

REQUEST NO. 14: Passing Sidings. *On a map, identify all passing sidings on portion(s) of the Sunset Limited’s route that you hosted, owned, operated, dispatched, served, and/or leased the during the Relevant Period. Identify any passing siding that was not long enough to one or more train(s) that traveled past that passing siding during the Relevant Period.*

RESPONSE TO REQUEST NO. 14: The below table sets forth all passing sidings on the BNSF Lafayette Subdivision, from Live Oak, La. (MP C14.95) to Iowa Junction, La. (MP C205.4).³⁰ These are also identified on the map provided in response to Request No. 11. Freight train lengths are captured at the automatic equipment identification (“AEI”) reader locations along this segment of the Route. As measured based on the length of the freight train recorded at the available AEI location most immediately prior to the siding, each siding listed below could not accommodate at least one freight train that traveled past it during the Relevant Period.

³⁰ As discussed above in response to Request No. 1, BNSF and UP jointly own, operate, and dispatch the segment of the Route from Iowa Junction, La. (MP C205.4) to Dawes, Tex. (MP E353.0). As a result of the division of responsibilities between BNSF and UP discussed above in response to Request No. 1, BNSF does not have immediate access to data that UP manages in order to include the western segment of the 50/50 Line within the scope of BNSF’s response to Request Nos. 14, 15, 16, 18, 19 and 20.

Siding	Length (in feet)	Mile Posts
Roanoke Siding	9947	C190.4 - C192.4
Crowley Siding	10690	C163.9 - C166.0
Cade Siding	8127	C130.8 - C132.6
New Iberia Siding	10500	C125.5 - C127.6
Baldwin Siding	10300	C105.3 - C107.3
Bayou Siding	10500	C95.7 - C97.8
Berwick Siding	8749	C80.9 - C82.5
Schriever Siding	7760	C54.2 - C55.7
Raceland Siding	10828	C40.0 - C42.2
Salix Siding	9773	C18.3 - C20.3

REQUEST NO. 15: Sidings and train length. *How many freight trains traveled on portion(s) of the Route you hosted, owned, operated, dispatched, served, or leased during the Relevant Period, that could not fit into passing sidings that the train traveled past?*

RESPONSE TO REQUEST NO. 15: 4,618 freight trains traveled on at least some portion of the Route between Iowa Junction and Live Oak during the Relevant Period. As discussed above in response to Request No. 14, BNSF can determine from AEI reader data the length of each of those 4,618 freight trains at the AEI reader location immediately prior to when the train passed the siding. Based on this data, BNSF determined that 308 of those trains could not fit into at least one passing siding that the train travelled past.³¹

³¹ On other portions of BNSF's network where Amtrak operates, BNSF may have been able to use data from its signal system to respond to Request Nos. 14, 15, 16, 19, and 20. As described in response to Request No. 22, BNSF uses a Track Warrant Control ("TWC") to dispatch all but the western-most 3.7 miles (under two percent) of the BNSF Lafayette Subdivision. Under TWC, a dispatcher provides verbal authorization for train movements using radio, phone, or other electronic transmission. The TWC portions of BNSF's network do not generate detailed On Station ("OS") data. Therefore, BNSF used data from AEI readers to respond to these requests.

REQUEST NO. 16: Amtrak delays and siding length. *List each instance during the Relevant Period, where passing siding length resulted in an Amtrak train being stopped or slowed (i.e., when a freight train could not fit onto passing siding due to a lack of length) on portion(s) of the Route that you host, own, operate, dispatch, serve, or lease. Identify the schedule skeleton segment or skeleton-station involved, the duration of the delay to the Amtrak train, and the Amtrak train number affected, with its date of departure from origin terminal.*

RESPONSE TO REQUEST NO. 16: BNSF does not directly track instances where passing siding length resulted in the delay of an Amtrak train. In order to respond to this request, BNSF undertook the following analysis:

1. First, BNSF identified delay instances reported by Amtrak on the BNSF Lafayette Subdivision during the Relevant Period.
2. Second, BNSF narrowed that set of delay instances to those categorized by Amtrak as FTI.
3. Third, BNSF narrowed that set of FTI delay instances to those instances that may have corresponded to a situation where at least one freight train may have been too long to fit into at least one passing siding. To do this, BNSF used available AEI data and Amtrak train data to find those FTI delay instances where: (a) a passing siding is either within the segment where Amtrak reported the delay or the next passing siding on either side of this segment; and (b) a freight train could have been travelling by this passing siding within an hour before or after when the Amtrak train was within the segment where Amtrak reported the delay.
4. Fourth, BNSF analyzed that more narrow set of 44 FTI delay instances to determine those instances where the delay reason provided by Amtrak referenced a lead locomotive of a freight train that was too long to fit into at least one of the passing sidings the train was travelling past.

That analysis yielded a list of 15 instances during the Relevant Period where passing siding length may have resulted in an Amtrak train being stopped or slowed (i.e., when a freight train could not fit onto a passing siding due to a lack of length) on the BNSF Lafayette Subdivision. The requested details for each such instance are provided in the BNSF document

“Data_Dictionary_and_Templates_NOR_42175_BNSF_9_25_RESPONSE.xlsm”, at tab “bnsf_amtrak_delays_siding_leng”.

REQUEST NO. 17: Passing sidings or double-track removed. *Between October 1, 2016, and December 8, 2022 (i.e., the Relevant Period and five years prior), did you remove or shorten any passing sidings or double-track segments on portions of the Sunset Limited that you host, own, operate, dispatch, serve, or lease? If so, provide the uniform milepost number associated with such sidings or double-track segments, the sidings’ or double-track segment’s original length (and new length, if shortened), and the circumstances leading to their removal.*

RESPONSE TO REQUEST NO. 17: BNSF did not remove or shorten any passing sidings or double-track segments on the BNSF Lafayette Subdivision between October 1, 2016 and December 8, 2022.³²

REQUEST NO. 18: Passing sidings blocked or unavailable. *Provide a list of each instance during the Relevant Period where a passing siding on a portion of the Sunset Limited that you hosted, owned, operated, dispatched, served, and/or*

³² As discussed above in response to Request No. 1, UP is responsible for maintenance (and is the host for Amtrak) on the segment of the Route from Iowa Junction, La. (MP C205.4) to Dawes, Tex. (MP E353.0). As a result, BNSF cannot determine whether any passing sidings or double-track segments were removed on that segment of the Route during the period identified by the Board in this Request No. 17.

leased was unavailable for meeting or passing trains for five consecutive days or longer. This list should clearly identify each passing siding with a uniform milepost number. The list should also include the date range that each passing siding was blocked or otherwise unavailable, and a reason for the unavailability; for example, stored cars causing a blockage, maintenance, or track condition.

RESPONSE TO REQUEST NO. 18: The requested list is provided in the BNSF document, “Data_Dictionary_and_Templates_NOR_42175_BNSF_9_25_RESPONSE.xlsx”, at tab “bnsf-sidings_blocked_or_unavail”. The list includes the nature and reason for the unavailability of the siding if BNSF had that information.

REQUEST NO. 19: Schedule skeleton segment data. *Provide schedule skeleton segment data for the portion(s) of the Route that you host, own, operate, dispatch, serve, or lease in a table. The list should be in a machine-readable table; it should include the following as separate data fields:*

- a. Skeleton Schedule Segment.*
- b. Skeleton Schedule Segment Road Mileage.*
- c. Mileage of single-track territory.*
- d. Mileage of sidings on single-track territory.*
- e. Mileage of sidings on single-track territory under or equal to 10,000 feet,*
- f. Mileage of double-track territory.*
- g. Mileage of sidings on double-track territory.*
- h. Mileage of sidings on double-track territory under or equal to 10,000 feet.*
- i. Freight train-miles, by direction and in total from 10/1/2021 through 12/8/2022.*

RESPONSE TO REQUEST NO. 19: In response to this Request, BNSF is producing a BNSF document entitled, “Data_Dictionary_and_Templates_NOR_42175_BNSF_9_25_RESPONSE.xlsx”, at

tab “bnsf_schedule_skeleton_segments” with this data for the portion of the Sunset Limited Route that BNSF hosts.

REQUEST NO. 20: Freight train speeds. *For each of your segments where the Sunset Limited operates, provide the actual average freight train speed between each successive pair of control points during the Relevant Period. Provide notation of any equalization calculations used with any calculations.*

RESPONSE TO REQUEST NO. 20: In response to this Request, BNSF is producing a document entitled, “Data_Dictionary_and_Templates_NOR_42175_BNSF_9_25_RESPONSE.xlsm”, at tab “bnsf_freight_train_speed”. Average freight train speeds are calculated using timestamp information from the AEI event data and engineering distances between the AEI readers. Speed is calculated as the difference in the event times recorded at two adjacent AEI reader locations for the same train, divided by the engineering distance between those two AEI reader locations. Average freight train speed over a given AEI-to-AEI segment is calculated using the simple average speed of all individual freight trains that were captured at both AEI readers on that segment.

REQUEST NO. 21: Plans for improving passenger OTP. *Provide a narrative and any relevant documents explaining any measures or plans you have for improving passenger service and on-time performance of Amtrak trains.*

RESPONSE TO REQUEST NO. 21: BNSF values the collaborative relationship it has developed with Amtrak and takes seriously the responsibility of hosting Amtrak’s intercity passenger rail service. BNSF has a dedicated team of leaders that operate, manage, and provide oversight of passenger operations including Amtrak and commuter rail. BNSF recognizes that the on-time performance is important to rail passengers and BNSF views its Amtrak hosting

responsibility as an integral part of the process of transporting passengers to their destinations in a timely manner.

First and foremost, BNSF prioritizes passenger trains throughout its national rail network and has emphasized the importance of passenger service throughout the company. For example, the 2022 Transportation Team Key Objectives—a two-page summary that is distributed to all BNSF transportation managers and their supervisors—outlines key objectives for BNSF for 2022, including “Amtrak Customer OTP of 80% or better” and “‘A’ Grade on Amtrak Host Report for delay avoidance.”³³ BNSF also strives to carefully balance the needs of its freight customers and its Amtrak hosting responsibilities.

The Amtrak and BNSF passenger teams meet regularly to address and coordinate on a diverse range of topics in an effort to increase passenger rail performance. These teams have made progress on improving on-time performance of passenger service and Amtrak trains. BNSF collaborates with Amtrak to improve on-time performance on BNSF-hosted lines in a multi-front effort, centered around collaborative solution-based meetings to coordinate overall network recovery efforts and weekly passenger operations scorecards that are shared with key BNSF and Amtrak stakeholders.

BNSF values its partnership with Amtrak and the two railroads collaborate at various levels of their organizations. At the CEO level, Amtrak and BNSF meet every other month to discuss the network and review performance. The BNSF passenger operations team – including an Assistant Vice President, Director, Assistant Director, and multiple Managers – regularly meet with Amtrak to discuss performance, including at Amtrak and BNSF headquarters, field locations, and on BNSF- and Amtrak-sponsored train trips. BNSF’s NOC Team leads continuous

³³ See 2022 Transportation Team Key Objectives (BNSF-SUNSET-0003159).

round-the-clock coverage dedicated to the oversight of Amtrak trains while on BNSF-hosted rail lines.

BNSF plans to improve Amtrak on-time performance by continuing its policy and practice of prioritizing passenger trains and by improving network velocity for all train groups—freight and passenger—across its interconnected national rail network. BNSF creates targeted issue resolution plans (IRPs) for challenged trains or locations on the network, identified through feedback from Amtrak or from BNSF's internal passenger performance scorecard. Through the IRPs, cross-functional departments identify a specific performance issue and rally around removing barriers to improve passenger train performance. Because of the importance of passenger operations, BNSF conducts bi-monthly executive level reviews of passenger rail performance. BNSF plans to continue all of these efforts in a constant effort to improve Amtrak on-time performance.

BNSF meets with Amtrak quarterly to review maintenance activities on the network and potential impacts to passenger trains. While BNSF works to minimize the disruption to Amtrak by scheduling routine windows outside of passenger schedules, delays are possible due to disturbed track slow orders or residual congestion from prior windows. To offset some of these impacts, BNSF programs certain activities during the night to limit Amtrak delays.

As described above, Amtrak and BNSF regularly hold collaborative meetings, which allow BNSF to address the measures it has taken to improve passenger service and on-time performance of Amtrak trains. Two specific examples of this type of meeting are summarized below:

May 3, 2023 BNSF Performance – Executive Review³⁴: A jointly-held Amtrak and BNSF Performance Executive Meeting where multiple topics were discussed, including disaster-level weather events; network momentum; recovery from supply chain challenges; 2023-line expansion projects; and Customer OTP, including OTP by responsible party on certain Amtrak lines.

March 31, 2022 Amtrak/BNSF Operations Update³⁵: A jointly held in-person meeting in Washington D.C. where BNSF leaders met with Amtrak leaders, to discuss a wide range of operations and engineering matters. During this meeting, BNSF shared its 2022 goals with Amtrak, which included discussion of network system goal alignment between BNSF and Amtrak, Amtrak’s weekly “report card” of BNSF’s performance, BNSF’s targeted IRPs for challenged locations on BNSF-hosted Amtrak routes, and joint collaboration on schedules and delay analysis.³⁶ The collaborative meeting also included discussion of recent severe weather and BNSF’s weather-related service recovery action levers in place to mitigate the effects of extreme weather.³⁷ BNSF also discussed with Amtrak the current state of the BNSF network and some of the actions taken to increase velocity on the network, including aggressively hiring Train, Yard, and Engine personnel; drawing down of non-productive railcar inventory; increasing locomotive supply; establishing issue resolution plans for challenged corridors; increasing coordination calls

³⁴ See BNSF Performance – Executive Review, Amtrak/BNSF Meeting (May 3, 2023) (BNSF-SUNSET-0000520).

³⁵ See Amtrak/BNSF Operations Update (Mar. 31, 2022) (BNSF-SUNSET-0000542).

³⁶ See Amtrak/BNSF Operations Update (Mar. 31, 2022) at BNSF-SUNSET-0000543.

³⁷ See Amtrak/BNSF Operations Update (Mar. 31, 2022) at BNSF-SUNSET-0000544).

between the Amtrak and BNSF teams to accelerate recovery; and aiming to relentlessly attack non-planned stop events and service interruptions on the network. Other topics discussed during this joint meeting included BNSF's 2022 capital investment goals, estimated at \$3.55 billion, and planned capital work, including removing and replacing the track ballast (also called undercutting) on BNSF's portion of the *Sunset Limited* Route, and the Customer OTP metrics for certain Amtrak services.³⁸ This meeting is an example of the way BNSF has been collaborating with Amtrak.

In response to this Request, BNSF is producing the following:

- BNSF Performance – Executive Review, Amtrak/BNSF Meeting (May 3, 2023) (BNSF-SUNSET-0000520);
- Amtrak/BNSF Operations Update (Mar. 31, 2022) (BNSF-SUNSET-0000542); and
- 2022 Transportation Team Key Objectives (BNSF-SUNSET-0003158)

REQUEST NO. 22: Dispatching protocols. *Explain your dispatching protocols on the portion(s) of the Route for which you provide dispatching. Produce documentation about your dispatching procedures used during the Relevant Period. Include standard operating procedures, employee training manuals, guidelines, instructions, and other relevant material.*

RESPONSE TO REQUEST NO. 22: BNSF is committed to the safe and efficient movement of trains over the portions of the *Sunset Limited* Route that BNSF hosts. BNSF's dispatching protocols for train movement are guided by two overarching principles: "[t]o the extent possible, give priority trains preference, and

³⁸ See Amtrak/BNSF Operations Update (Mar. 31, 2022) at BNSF-SUNSET-0000547-552.

delay no trains unnecessarily.”³⁹ Dispatching protocol, therefore, is governed hierarchically by train type.⁴⁰

Train Dispatcher Duties. The duties of a BNSF train dispatcher include: (1) authorizing the safe and efficient movement of trains, crew, and equipment over assigned territory, (2) maximizing the utilization of maintenance work groups, (3) complying with all dispatching rules, and (4) maintaining detailed and accurate records of train movement and train activity.⁴¹ Dispatchers issue mandatory directives to authorize train movements.⁴² Those mandatory directives include track warrants, track bulletins, track permits, and radio speed restrictions.⁴³

Train Priority. BNSF trains its dispatchers to prioritize passenger trains above all other train types. The following slide is included in the first module of BNSF’s New Hire Training Materials, showing that passenger trains receive the highest priority in BNSF’s priority grouping system:⁴⁴

³⁹ See Train Dispatcher’s and Control Operator’s Manuals dated November 1, 2020, including updates through October 1, 2022 at BNSF-SUNSET-0000016.

⁴⁰ See Train Dispatcher New Hire Training Materials, Module 1, at BNSF-SUNSET-0003785.

⁴¹ See Dispatching & Signal Communication Railroad 101 materials from Spring 2022, at BNSF-SUNSET-0004879.

⁴² See General Code of Operating Rules, effective April 1, 2020, at BNSF-SUNSET-0000614.

⁴³ See General Code of Operating Rules, effective April 1, 2020, at BNSF-SUNSET-0000614.

⁴⁴ See Train Dispatcher New Hire Training Materials, Module 1, at BNSF-SUNSET-0003785.

Train Types & Priorities

SG 1-8

Passenger

Intermodal

High Priority Freight

Coal/Oil

Grain

Locals/Lower Priority Freight



After passenger trains, freight trains are classified into five categories, as shown in the slide above.⁴⁵

BNSF dedicates a portion of its Train Dispatcher's and Control Operator's Manual to passenger train operations. That manual explicitly requires that dispatchers "[d]o not delay passenger trains for freight trains or maintenance work unless approved by the Chief Dispatcher."⁴⁶ Dispatchers must also plan in advance to avoid delay to passenger trains.⁴⁷ All passenger train delays are to be reported to the Chief Dispatcher.⁴⁸

⁴⁵ See Train Dispatcher New Hire Training Materials, Module 1, at BNSF-SUNSET-0003785.

⁴⁶ See Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022, at BNSF-SUNSET-0000020.

⁴⁷ See Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022, at BNSF-SUNSET-0000020.

⁴⁸ See Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022, at BNSF-SUNSET-0000020.

Method of Dispatching. BNSF uses TWC to authorize train movements on all but the western-most portion—approximately 3.7 miles—of the BNSF Lafayette Subdivision, the portion of the *Sunset Limited* Route that BNSF hosts.⁴⁹ Under TWC, a dispatcher provides verbal authorization for train movements using radio, phone, or other electronic transmission. TWC authorizes train movement on a specific segment of mainline track for a specific period of time. A dispatcher sends a track warrant (written authority for access to a section of track) to a crew via radio, phone, or electronic transmission. The crew then operates pursuant to the track warrant.⁵⁰ In issuing track warrants to freight and passenger trains, the dispatcher works to construct a free, uninhibited route for passenger trains. Where unexpected events occur that disrupt track activity, BNSF trains its dispatchers to minimize any impact on passenger train movement. Regardless of the dispatching technology, the dispatcher receives the same training and applies the same dispatching priorities outlined in the material provided in response to this request.

In response to this Request, BNSF is producing its:

- Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022 (BNSF-SUNSET-0000097 (September 1, 2021); BNSF-SUNSET-0000193 (January 1, 2022); BNSF-SUNSET-0000289 (April 1, 2022); BNSF-SUNSET-0000385 (August 1, 2022); BNSF-SUNSET-0000001 (October 1, 2022));
- Train Dispatcher New Hire Training Materials (BNSF-SUNSET-0003077, BNSF-SUNSET-0003120, BNSF-SUNSET-0003757, BNSF-SUNSET-0003792-BNSF-SUNSET-0004873);

⁴⁹ Because UP has primary dispatching responsibility (and is the contractual host) over the portion of the Route from Iowa Junction, Louisiana (MP C205.4) to Dawes, Texas (MP E353.0), as discussed above in response to Request No. 1, UP is better positioned to address the dispatching protocols on this segment of the Route.

⁵⁰ See Dispatching & Signal Communication Railroad 101 Materials from Spring 2022, at BNSF-SUNSET-0004910.

- Dispatching & Signal Communication Railroad 101 Materials from Spring 2022 (BNSF-SUNSET-0004874);
- General Code of Operating Rules, effective April 1, 2020 (BNSF-SUNSET-0000554);
- Maintenance of Way Operating Rules dated January 1, 2018, (including updates through December 1, 2022) (BNSF-SUNSET-0000699 (October 1, 2021); BNSF-SUNSET-0001225 (March 1, 2022); BNSF-SUNSET-0001559 (July 1, 2022); BNSF-SUNSET-0002025 (December 1, 2022)); and
- Train Dispatcher Job Safety Briefing dated April 20, 2022 (BNSF-SUNSET-0002273).

BNSF is also producing fifteen System Special Instructions in effect from August 4, 2021 – December 1, 2022:

- BNSF-SUNSET-0000827;
- BNSF-SUNSET-0000893;
- BNSF-SUNSET-0000959;
- BNSF-SUNSET-0001025;
- BNSF-SUNSET-0001091;
- BNSF-SUNSET-0001157;
- BNSF-SUNSET-0001353;
- BNSF-SUNSET-0001421;
- BNSF-SUNSET-0001489;
- BNSF-SUNSET-0001687;
- BNSF-SUNSET-0001757;
- BNSF-SUNSET-0001824;
- BNSF-SUNSET-0001891;
- BNSF-SUNSET-0001958; and
- BNSF-SUNSET-0002153.

REQUEST NO. 23: Computer/automated dispatching. Produce documentation about any computer assisted dispatching used during the Relevant Period on the portion(s) of the Route for which you provide dispatching. This

includes automated dispatching and any time a computer provided a recommendation.

RESPONSE TO REQUEST NO. 23: BNSF did not use any computer-assisted dispatching during the Relevant Period on the portion of the Route that BNSF hosts, and for which BNSF has primary dispatching responsibility: BNSF's Lafayette Subdivision.

BNSF utilizes Train Management and Dispatching System ("TMDS") as a software tool that assists with the tracking of trains, maintenance, and the creation/delivery of mandatory directives. But TMDS does not include automated dispatching or any computer-generated recommendations.

In response to this Request, BNSF is producing eleven documents that illustrate the TMDS tool:

- BNSF-SUNSET-0003077;
- BNSF-SUNSET-0001025;
- BNSF-SUNSET-0003897;
- BNSF-SUNSET-0003980;
- BNSF-SUNSET-0004183;
- BNSF-SUNSET-0004320;
- BNSF-SUNSET-0004416;
- BNSF-SUNSET-0004448;
- BNSF-SUNSET-0004473;
- BNSF-SUNSET-0004654; and
- BNSF-SUNSET-0004706.

REQUEST NO. 24: Dispatching algorithms. Explain the rule(s)/algorithm(s) programed into any computer system that either determines dispatching or recommends dispatching solutions; include a decision tree explaining how the program makes its decisions.

RESPONSE TO REQUEST NO. 24: As explained in its response to Request No. 23, BNSF does not use computer-assisted dispatching technology that determines dispatching or recommends dispatching solutions on the portion of the *Sunset Limited* Route that BNSF hosts. As a result, there is no algorithm or computer system that determines dispatching or recommends dispatching solutions for that segment during the Relevant Period.

REQUEST NO. 25: Train length and priority. To what extent, if any, does train length impact a train's priority under your dispatching protocols?

RESPONSE TO REQUEST NO. 25: As noted above, BNSF's dispatching protocols for train movement are guided by two overarching principles: dispatchers are to give priority trains preference, and delay no trains unnecessarily.⁵¹ Passenger trains are designed to receive the highest priority status regardless of the length of freight trains operating on the same track. BNSF's dispatching protocols remain the same: dispatchers should not delay passenger trains for freight trains unless approved by the Chief Dispatcher.⁵² Of course, dispatchers must consider many factors – including the length of other trains – when planning a path for a passenger train. As a result, dispatchers are trained to locate holding areas for longer trains so as to not delay passenger trains. If a passing siding is not long enough to accommodate a freight train, dispatchers use other techniques to minimize any passenger train delay, such as moving the passenger train in front of the freight train via a passing siding.

⁵¹ See Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022, at BNSF-SUNSET-0000016.

⁵² See Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022, at BNSF-SUNSET-0000020.

REQUEST NO. 26: *Expiring crews.* *Explain how you plan for freight crew expiration (pursuant to 49 U.S.C. § 21103(a)(2)).*

RESPONSE TO REQUEST NO. 26: BNSF dispatchers are trained to manage all track and crew activities to facilitate the efficient operations of all trains on its network, including on BNSF’s portion of the *Sunset Limited* Route. Train dispatchers receive specific training on hours of service law and are well aware that employees may not exceed hours of service without proper authority.

A train crew may be on duty for up to twelve hours and then must be given at least ten hours off duty.⁵³ However, under the Hours of Service Act, a train crew may be allowed to remain or go on duty for an additional four hours “when an emergency exists and the work of the crew is related to the emergency.”⁵⁴ An “emergency” for purposes of wreck or relief service may be a less extraordinary or catastrophic event than an “unavoidable accident or Act of God” under section 5(d) of the Act.⁵⁵

Section 40.17 of BNSF’s Train Dispatcher’s and Control Operator’s Manual provides the general protocol for crews relieved on hours of service. Those rules state that train dispatchers must provide a relief or short-term crew with a general track bulletin, “addressed to the train symbol of the train the crew will relieve” before that relief crew leaves the initial terminal.⁵⁶ Section 43.10.2 of that manual, and the Train Dispatcher New Hire Training Materials, state that train dispatchers must submit and issue a such a track bulletin no less than twelve hours prior to the

⁵³ See Train Dispatcher New Hire Training Materials, Module 2, Part 2, at BNSF-SUNSET-0003871.

⁵⁴ 49 U.S.C. § 21103(d).

⁵⁵ See 49 C.F.R. Part 228, App. A.

⁵⁶ See Train Dispatcher’s and Control Operator’s Manuals dated November 1, 2020, including updates through October 1, 2022, at BNSF-SUNSET-0000019.

crew hours of service limitation unless approved by the Chief Dispatcher.⁵⁷ BNSF mandates this time frame so as to prevent any unnecessary delay that may occur as a result of dispatching a relief crew.

The specific plans for how train dispatchers handle freight crew expiration differ by dispatching territory. On the BNSF Lafayette Subdivision, the Joint Corridor Manager is responsible for recording each crews' hours of service, communicating each crews' hours of service to the train dispatchers on this segment, and requesting a relief crew if needed.

REQUEST NO. 27: Expiring crews on mainline track. *When a freight crew expires while their train is on mainline track, what considerations, if any, do you give to Amtrak trains that will be impacted?*

RESPONSE TO REQUEST NO. 27: The expiration of a freight crew on a mainline track is a rare exception to BNSF's standard operating procedures. Such expiration could occur as the result of an act of nature, mechanical issue, track failure, trespasser strike, bridge strike, blockage of an at-grade crossing issue, or extreme weather event.

BNSF dispatchers are responsible for understanding the restrictions applicable to train crews and for relieving those crews on hours of service.⁵⁸ Dispatchers are careful to ensure that crews do not expire on the mainline in the ordinary course of operations.

⁵⁷ See Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022, at BNSF-SUNSET-0000049; Train Dispatcher New Hire Training Materials, Module 5, Part 2, at BNSF-SUNSET-0004093.

⁵⁸ See Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022, at BNSF-SUNSET-0000019.

Even during extraordinary circumstances, BNSF dispatchers work to prevent crews from expiring on the mainline. BNSF trains its dispatchers to react efficiently. For example, a dispatcher understands a crew's timetable and can move an expiring crew off the mainline track and into a siding well before expiration. If the mainline track is blocked, the dispatcher can reroute passenger trains if an available alternate route would minimize any delay to the passenger train and preserves the route. If the mainline track remains blocked with no nearby alternative routes, BNSF will prioritize resolving the issue (e.g., moving the failed locomotive) in a manner that minimizes delay to passenger trains.

Additionally, a crew could remain on duty on the mainline track for a period in excess of the window authorized by the Hours of Service Act as a consequence of an unexpected event that impacts track conditions. Such unexpected circumstances may qualify as an "emergency" under the Hours of Service Act. Therefore, the crew on duty would not truly "expire" and could continue operating on the mainline track.

REQUEST NO. 28: Request 28 was not directed to BNSF.

REQUEST NO. 29: Request 29 was not directed to BNSF.

REQUEST NO. 30: Coordination with other railroads. Describe the procedures used to coordinate the handoff of Amtrak trains on the Sunset Limited to other railroads.

RESPONSE TO REQUEST NO. 30: In 1998, UP and BNSF established the Consolidated Dispatching Center (the "Center"), a joint regional dispatching center located in Spring, Tex., within UP's Spring regional office. From the joint dispatching center, UP and BNSF conduct joint dispatching for the 50/50 Line,

which is discussed further above in response to Request No. 1. BNSF and UP personnel engaged in joint dispatching physically sit in their respective offices at the Center and are supervised by a neutral joint director that is hired by both railroads.

To ensure that the BNSF Lafayette Subdivision operates efficiently, each morning a meeting occurs between the Joint Director of Operations for BNSF, the Assistant Joint Director, the Joint Corridor Managers (three BNSF and two UP employees) and the two dispatchers (one BNSF joint dispatcher and one UP joint dispatcher) on duty that day. The Joint Director of Operations reviews a list of projected trains that will operate across the corridor in order to determine whether any of the freight trains scheduled are of such a length that the train could potentially create a delay to Amtrak. If there is a train of such length, the Joint Director of Operations must review the request and authorize that train to run during a time frame that will not interfere with a scheduled passenger train.

BNSF joint dispatchers have primary dispatching responsibility for the eastern segment of the 50/50 Line, extending east-west from Live Oak, La. (MP C14.95) to Iowa Junction, La. (MP C205.4). UP joint dispatchers have primary dispatching responsibility for the western segment of the 50/50 Line, extending east-to-west from Iowa Junction, La. (MP C205.4) to Dawes, Tex. (MP E353.0). The UP and BNSF dispatchers that sit at the Center also dispatch their respective lines along the entire Gulf Coast region, radiating north and south from Houston.

With respect to specific dispatching handoff procedures, the westbound *Sunset Limited* train – Train 1 – enters the portion of the Route that BNSF hosts at Live Oak, La. (MP C14.95). A UP dispatcher hands off Train 1 at Live Oak to the BNSF joint dispatcher who has primary dispatching responsibility for the Live Oak

to Iowa Junction, La. segment of the 50/50 Line.⁵⁹ The BNSF joint dispatcher then follows the train from Live Oak to Iowa Junction. The BNSF joint dispatcher then hands off Train 1 to the UP joint dispatcher who has primary dispatching responsibility for the Iowa Junction to Dawes, Tex. segment of the 50/50 Line. For this transfer the BNSF joint dispatcher and the UP joint dispatcher are typically working side-by-side at the Consolidated Dispatching Center. The dispatchers can coordinate in person to effectuate the handoff.

For the eastbound *Sunset Limited* train, Train 2, the BNSF joint dispatcher with primary dispatching responsibility for the eastern segment of the 50/50 Line receives the train from the UP joint dispatcher with primary dispatching responsibility for the western segment of the 50/50 Line. Much as with the handoff of Train 1, the BNSF joint dispatcher and the UP joint dispatcher can coordinate in person to effectuate the handoff of dispatching at Iowa Junction. The BNSF joint dispatcher continues with Train 2 until it arrives at Live Oak. At Live Oak, the BNSF joint dispatcher hands off Train 2 to a UP dispatcher.⁶⁰

⁵⁹ See Amtrak Compl., App. A Schedule Skeleton. At times, Train 1 moves over BNSF mainline or yard track in and around Avondale Yard from West Bridge Junction (MP B10.5) to Live Oak (MP C14.95), despite BNSF not hosting the *Sunset Limited* for this portion of the Route. BNSF is the sole owner, operator, and dispatcher of that track segment, with an exception of a cross-over track between Avondale Yard and the 50/50 Line that spans less than a mile (from MP C14.10 to MP C14.95). The same BNSF employee that serves as the BNSF joint dispatcher west of Live Oak (MP C14.95) under the 50/50 Line joint dispatching arrangement with UP also serves as the BNSF dispatcher for the BNSF West Bridge Junction to Live Oak segment. If and when Train 1 moves onto BNSF track at West Bridge Junction (MP B10.5), a UP dispatcher hands off Train 1 to the BNSF dispatcher at that point. That same BNSF dispatcher becomes the BNSF joint dispatcher under the 50/50 Line joint dispatching arrangement once Train 1 enters the BNSF Lafayette Subdivision at Live Oak (MP C14.95).

⁶⁰ Train 2 sometimes moves over BNSF mainline or yard track in and around Avondale Yard from Live Oak (MP C14.95) to West Bridge Junction (MP B10.5), despite BNSF not hosting the *Sunset Limited* for this portion of the Route. See

Respectfully submitted,

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Dated: September 25, 2023

supra note 59. If and when Train 2 moves onto BNSF track at Live Oak (MP C14.95), the same BNSF employee that serves as the BNSF joint dispatcher for the segment west of Live Oak serves as the BNSF dispatcher for the BNSF Live Oak to West Bridge Junction segment. That BNSF dispatcher then hands-off Train 2 to a UP dispatcher when Train 2 passes West Bridge Junction.

BEFORE THE
SURFACE TRANSPORTATION BOARD

DOCKET NO. NOR 42175

COMPLAINT AND PETITION OF THE NATIONAL RAILROAD PASSENGER
CORP. UNDER 49 U.S.C. § 24308(f) FOR SUBSTANDARD PERFORMANCE OF
AMTRAK'S SUNSET LIMITED TRAINS 1 AND 2

VERIFICATION

I, James Tylick, hereby certify that I am authorized to sign this verification on behalf of BNSF Railway Company.

I have read all answers in **BNSF's Response to the Board's Interrogatories and Document Requirements; Appendix A – Part IV ("Response")**. While I do not have personal knowledge of all of the facts recited therein, I have been informed that the Response is based on information collected by others at or on behalf of BNSF, and is therefore necessarily limited to the records and information in existence, presently collected, and thus far discovered in the course of the preparation of the Response.

I reserve the right to make any changes to the Response if it appears at any time that omissions or errors have been made therein or that more accurate information is available.

Subject to the limitations set forth therein, I affirm that the Response is true to the best of my knowledge, information and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on September 25, 2023, in Fort Worth, Texas.

/s/ James Tylick
James Tylick

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing Appendix A – Part IV of BNSF Railway Company submission to be served electronically or by first-class mail, postage pre-paid, on all parties of record in this proceeding.

/s/ Onika K. Williams
Onika K. Williams

Attorney for BNSF Railway Company

September 25, 2023

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	Description of File	Begin Bates	End Bates	Responsive to Question(s)	File Name
1	Data Dictionary and Templates _NOR_42175_BNSF_9_25_RESP ONSE			RFP 14 – Passing Sidings; RFP 15 – Sidings and train length; RFP 16 – Amtrak delays and siding length; RFP 18 – Passing sidings blocked or unavailable; RFP 19 – Schedule skeleton segment data; RFP 20 – Freight train speeds	BNSF_PUBLIC_REDACTED_Data_Dictionary_and_Templates_NOR_42175_BNSF_9_25_RESPONSE; BNSF_CONFIDENTIAL_Data_Dictionary_and_Templates_NOR_42175_BNSF_9_25_RESPONSE.xlsx
2	ESRI Shapefiles			RFP 11 – Maps	BNSF_NativeMapESRIShapefiles.zip
3	Request 14_15_16 Workpaper			RFP 14 – Passing Sidings; RFP 15 – Sidings and train length; RFP 16 – Amtrak delays and siding length;	BNSF_Request_14_15_16_Workpaper_Conf.xlsx
4	Request 19 and 20 Workpaper			RFP 19 – Schedule skeleton segment data; RFP 20 – Freight train speeds	BNSF_Request_19_20_Workpaper_Conf.xlsx
5	Train Dispatcher’s and Control Operator’s Manuals dated November 1, 2020, including updates through October 1, 2022 (October 1, 2022)	BNSF-SUNSET-0000001	BNSF-SUNSET-0000096	RFP 22 – Dispatching protocols; RFP 25 – Train length and priority; RFP 26 – Expiring crews; RFP 27 – Expiring crews on mainline track	BNSF_PUBLIC_ProductionPartI_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartI_PartIV_20230925.pdf

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6	Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022 (September 1, 2021)	BNSF-SUNSET-0000097	BNSF-SUNSET-0000192	RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartI_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartI_PartIV_20230925.pdf
7	Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022 (January 1, 2022)	BNSF-SUNSET-0000193	BNSF-SUNSET-0000288	RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartI_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartI_PartIV_20230925.pdf
8	Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022 (April 1, 2022)	BNSF-SUNSET-0000289	BNSF-SUNSET-0000384	RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartI_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartI_PartIV_20230925.pdf
9	Train Dispatcher's and Control Operator's Manuals dated November 1, 2020, including updates through October 1, 2022 (August 1, 2022)	BNSF-SUNSET-0000385	BNSF-SUNSET-0000480	RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartI_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartI_PartIV_20230925.pdf
10	System General Orders dated September 28, 2022	BNSF-SUNSET-0000481	BNSF-SUNSET-0000519	RFP 13 – Employee Timetables	BNSF_PUBLIC_ProductionPartI_PartIV_20230925.pdf; BNSF_PUBLIC_ProductionPartII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartI_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartII_PartIV_20230925.pdf

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11	BNSF Performance – Executive Review, Amtrak/BNSF Meeting (May 3, 2023)	BNSF-SUNSET-0000520	BNSF-SUNSET-0000541	RFP 21 – Plans for improving passenger OTP	BNSF_PUBLIC_ProductionPartII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartII_PartIV_20230925.pdf
12	Amtrak/BNSF Operations Update (Mar. 31, 2022)	BNSF-SUNSET-0000542	BNSF-SUNSET-0000553	RFP 21 – Plans for improving passenger OTP	BNSF_PUBLIC_ProductionPartII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartII_PartIV_20230925
13	General Code of Operating Rules, effective April 1, 2020	BNSF-SUNSET-0000554	BNSF-SUNSET-0000698	RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartII_PartIV_20230925
14	Maintenance of Way Operating Rules dated January 1, 2018, (including updates through December 1, 2022) (October 1, 2021)	BNSF-SUNSET-0000699	BNSF-SUNSET-0000826	RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartII_PartIV_20230925
15	System Special Instructions (October 1, 2021)	BNSF-SUNSET-0000827	BNSF-SUNSET-0000892	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartII_PartIV_20230925
16	System Special Instructions (November 1, 2021)	BNSF-SUNSET-0000893	BNSF-SUNSET-0000958	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartII_PartIV_20230925

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17	System Special Instructions (November 4, 2021)	BNSF-SUNSET-0000959	BNSF-SUNSET-0001024	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartII_PartIV_20230925.pdf; BNSF_PUBLIC_ProductionPartIII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartII_PartIV_20230925; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIII_PartIV_20230925.pdf
18	System Special Instructions (November 11, 2021)	BNSF-SUNSET-0001025	BNSF-SUNSET-0001090	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIII_PartIV_20230925.pdf
19	System Special Instructions (December 1, 2021)	BNSF-SUNSET-0001091	BNSF-SUNSET-0001156	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIII_PartIV_20230925.pdf
20	System Special Instructions (January 1, 2022)	BNSF-SUNSET-0001157	BNSF-SUNSET-0001224	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIII_PartIV_20230925.pdf
21	Maintenance of Way Operating Rules dated January 1, 2018, (including updates through December 1, 2022) (March 1, 2022)	BNSF-SUNSET-0001225	BNSF-SUNSET-0001352	RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIII_PartIV_20230925.pdf

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22	System Special Instructions (April 1, 2022)	BNSF-SUNSET-0001353	BNSF-SUNSET-0001420	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIII_PartIV_20230925.pdf
23	System Special Instructions (May 1, 2022)	BNSF-SUNSET-0001421	BNSF-SUNSET-0001488	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIII_PartIV_20230925.pdf
24	System Special Instructions (June 3, 2022)	BNSF-SUNSET-0001489	BNSF-SUNSET-0001558	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIII_PartIV_20230925.pdf; BNSF_PUBLIC_ProductionPartIV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIV_PartIV_20230925
25	Maintenance of Way Operating Rules dated January 1, 2018, (including updates through December 1, 2022) (July 1, 2022)	BNSF-SUNSET-0001559	BNSF-SUNSET-0001686	RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIV_PartIV_20230925
26	System Special Instructions (July 1, 2022)	BNSF-SUNSET-0001687	BNSF-SUNSET-0001756	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIV_PartIV_20230925.pdf

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27	System Special Instructions (August 1, 2022)	BNSF-SUNSET-0001757	BNSF-SUNSET-0001823	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIV_PartIV_20230925.pdf
28	System Special Instructions (August 1, 2022)	BNSF-SUNSET-0001824	BNSF-SUNSET-0001890	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIV_PartIV_20230925.pdf
29	System Special Instructions (September 1, 2022)	BNSF-SUNSET-0001891	BNSF-SUNSET-0001957	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIV_PartIV_20230925.pdf
30	System Special Instructions (October 1, 2022)	BNSF-SUNSET-0001958	BNSF-SUNSET-0002024	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartIV_PartIV_20230925.pdf; BNSF_PUBLIC_ProductionPartV_PartV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartIV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartV_PartV_20230925.pdf
31	Maintenance of Way Operating Rules dated January 1, 2018, (including updates through December 1, 2022) (December 1, 2022)	BNSF-SUNSET-0002025	BNSF-SUNSET-0002152	RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartV_PartV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartV_PartV_20230925.pdf

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32	System Special Instructions (December 1, 2022)	BNSF-SUNSET-0002153	BNSF-SUNSET-0002219	RFP 13 – Employee Timetables; RFP 22 – Dispatching protocols	BNSF_PUBLIC_ProductionPartV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartV_PartIV_20230925.pdf
33	System General Orders dated November 23, 2022	BNSF-SUNSET-0002220	BNSF-SUNSET-0002225	RFP 13 – Employee Timetables	BNSF_PUBLIC_ProductionPartV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartV_PartIV_20230925.pdf
34	System General Orders dated July 28, 2022	BNSF-SUNSET-0002226	BNSF-SUNSET-0002243	RFP 13 – Employee Timetables	BNSF_PUBLIC_ProductionPartV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartV_PartIV_20230925.pdf
35	System General Orders dated November 23, 2022	BNSF-SUNSET-0002244	BNSF-SUNSET-0002259	RFP 13 – Employee Timetables	BNSF_PUBLIC_ProductionPartV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartV_PartIV_20230925.pdf
36	Map	BNSF-SUNSET-0002260	BNSF-SUNSET-0002272	RFP 11 – Maps	BNSF_PUBLIC_ProductionPartV_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartV_PartIV_20230925.pdf
37	Train Dispatcher Job Safety Briefing dated April 20, 2022	BNSF-SUNSET-0002273	BNSF-SUNSET-0002273	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf

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38	0800 Central Continental Time from April 22, 2020 – April 19, 2022	BNSF-SUNSET-0002274	BNSF-SUNSET-0002359	RFP 13 – Employee Timetables	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
39	0800 Central Continental Time from April 27, 2022 – July 11, 2023	BNSF-SUNSET-0002360	BNSF-SUNSET-0002455	RFP 13 – Employee Timetables	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
40	Lafayette Track Chart - June 27, 2023	BNSF-SUNSET-0002456	BNSF-SUNSET-0002518	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
41	Lafayette Track Chart - October 12, 2021	BNSF-SUNSET-0002519	BNSF-SUNSET-0002581	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
42	Lafayette Track Chart - November 19, 2021	BNSF-SUNSET-0002582	BNSF-SUNSET-0002644	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
43	Lafayette Track Chart - December 1, 2021	BNSF-SUNSET-0002645	BNSF-SUNSET-0002707	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf

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44	Lafayette Track Chart - January 12, 2022	BNSF-SUNSET-0002708	BNSF-SUNSET-0002770	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
45	Lafayette Track Chart - February 23, 2022	BNSF-SUNSET-0002771	BNSF-SUNSET-0002833	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
46	Lafayette Track Chart - March 16, 2022	BNSF-SUNSET-0002834	BNSF-SUNSET-0002896	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
47	Lafayette Track Chart - April 11, 2022	BNSF-SUNSET-0002897	BNSF-SUNSET-0002959	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
48	Crew Map	BNSF-SUNSET-0002960	BNSF-SUNSET-0002960	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
49	Dispatcher Leadership Workshop, dated April 12, 2022	BNSF-SUNSET-0002961	BNSF-SUNSET-0002968	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf

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50	SS 101 Design Training Slide Deck	BNSF-SUNSET-0002969	BNSF-SUNSET-0003070	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
51	TJSREQ for ReRoute via Xpress	BNSF-SUNSET-0003071	BNSF-SUNSET-0003073	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
52	TJSREQ for SCH EXT via Xpress	BNSF-SUNSET-0003074	BNSF-SUNSET-0003076	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf
53	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0003077	BNSF-SUNSET-0003119	RFP 22 – Dispatching protocols; RFP 23 – Computer/automated dispatching	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVI_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
54	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0003120	BNSF-SUNSET-0003157	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf

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55	2022 Transportation Team Key Objectives	BNSF-SUNSET-0003158	BNSF-SUNSET-0003159	RFP 21 – Plans for improving passenger OTP	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
56	Train Origination Request (TOR) Handbook	BNSF-SUNSET-0003160	BNSF-SUNSET-0003197	RFP 3 – Train scheduling process; RFP 10 – Unscheduled trains	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
57	Service Design Studio – ESD/IBO/ITO Slide Deck	BNSF-SUNSET-0003198	BNSF-SUNSET-0003222	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
58	ATJS [Active Schedule] System Appreciation Document	BNSF-SUNSET-0003223	BNSF-SUNSET-0003267	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
59	BTJS [Base Schedule] System Appreciation Document	BNSF-SUNSET-0003268	BNSF-SUNSET-0003306	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
60	ESD Training Manual	BNSF-SUNSET-0003307	BNSF-SUNSET-0003311	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf

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62	Train Schedule Life Cycle	BNSF-SUNSET-0003315	BNSF-SUNSET-0003315	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
63	Lafayette Track Chart - May 25, 2022	BNSF-SUNSET-0003316	BNSF-SUNSET-0003378	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
64	Lafayette Track Chart - July 6, 2022	BNSF-SUNSET-0003379	BNSF-SUNSET-0003441	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
65	Lafayette Track Chart - August 5, 2022	BNSF-SUNSET-0003442	BNSF-SUNSET-0003504	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
66	Lafayette Track Chart - August 30, 2022	BNSF-SUNSET-0003505	BNSF-SUNSET-0003567	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf

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67	Lafayette Track Chart - September 14, 2022	BNSF-SUNSET-0003568	BNSF-SUNSET-0003630	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
68	Lafayette Track Chart - October 28, 2022	BNSF-SUNSET-0003631	BNSF-SUNSET-0003693	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
69	Lafayette Track Chart - December 9, 2022	BNSF-SUNSET-0003694	BNSF-SUNSET-0003756	RFP 12 – Track charts	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
70	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0003757	BNSF-SUNSET-0003791	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
71	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0003792	BNSF-SUNSET-0003855	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
72	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0003856	BNSF-SUNSET-0003896	RFP 22 – Dispatching protocols; RFP 26 – Expiring crews	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf

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	Description of File	Begin Bates	End Bates	Responsive to Question(s)	File Name
73	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0003897	BNSF-SUNSET-0003951	RFP 22 – Dispatching protocols; RFP 23 – Computer/automated dispatching	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
74	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0003952	BNSF-SUNSET-0003979	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
75	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0003980	BNSF-SUNSET-0004012	RFP 22 – Dispatching protocols; RFP 23 – Computer/automated dispatching	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf
76	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004013	BNSF-SUNSET-0004055	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVII_PartIV_20230925.pdf; BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
77	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004056	BNSF-SUNSET-0004090	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf

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	Description of File	Begin Bates	End Bates	Responsive to Question(s)	File Name
78	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004091	BNSF-SUNSET-0004137	RFP 22 – Dispatching protocols; RFP 26 – Expiring crews	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
79	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004138	BNSF-SUNSET-0004182	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
80	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004183	BNSF-SUNSET-0004246	RFP 22 – Dispatching protocols; RFP 23 – Computer/automated dispatching	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
81	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004247	BNSF-SUNSET-0004260	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
82	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004261	BNSF-SUNSET-0004305	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
83	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004306	BNSF-SUNSET-0004319	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf

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84	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004320	BNSF-SUNSET-0004345	RFP 22 – Dispatching protocols; RFP 23 – Computer/automated dispatching	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
85	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004346	BNSF-SUNSET-0004415	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
86	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004416	BNSF-SUNSET-0004447	RFP 22 – Dispatching protocols; RFP 23 – Computer/automated dispatching	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
87	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004448	BNSF-SUNSET-0004472	RFP 22 – Dispatching protocols; RFP 23 – Computer/automated dispatching	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
88	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004473	BNSF-SUNSET-0004509	RFP 22 – Dispatching protocols; RFP 23 – Computer/automated dispatching	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
89	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004510	BNSF-SUNSET-0004528	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf

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90	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004529	BNSF-SUNSET-0004613	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
91	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004614	BNSF-SUNSET-0004653	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
92	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004654	BNSF-SUNSET-0004705	RFP 22 – Dispatching protocols; RFP 23 – Computer/automated dispatching	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
93	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004706	BNSF-SUNSET-0004735	RFP 22 – Dispatching protocols; RFP 23 – Computer/automated dispatching	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
94	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004736	BNSF-SUNSET-0004744	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
95	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004745	BNSF-SUNSET-0004792	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf

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96	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004793	BNSF-SUNSET-0004833	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
97	Train Dispatcher New Hire Training Materials	BNSF-SUNSET-0004834	BNSF-SUNSET-0004873	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
98	Dispatching & Signal Communication Railroad 101 materials from Spring 2022	BNSF-SUNSET-0004874	BNSF-SUNSET-0004911	RFP 22 – Dispatching protocols	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
99	BNSF Service Design Team FLS Technology Day – SD 101 addendum, dated June 3, 2019	BNSF-SUNSET-0004912	BNSF-SUNSET-0004950	RFP 3 – Train scheduling process	BNSF_HIGHLYCONFIDENTIAL_ProductionPartVIII_PartIV_20230925.pdf
100	IOWJCT Base Sch 2021-10-01 to 2022-12-08	BNSF-SUNSET-0004951	BNSF-SUNSET-0004951	RFP 8 – Train schedules	BNSFSUNSET0004951_HC.xlsx
101	IOWJCT Act Sch 2021-10-01 to 2022-12-08	BNSF-SUNSET-0004952	BNSF-SUNSET-0004952	RFP 8 – Train schedules	BNSFSUNSET0004952_HC.xlsx