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VIA ELECTRONIC FILING

October 6, 2023

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

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Office of Proceedings
October 6, 2023
Part of
Public Record

RE: Docket No. EP 770 (Sub No. 1), Urgent Issues in Freight Rail Service

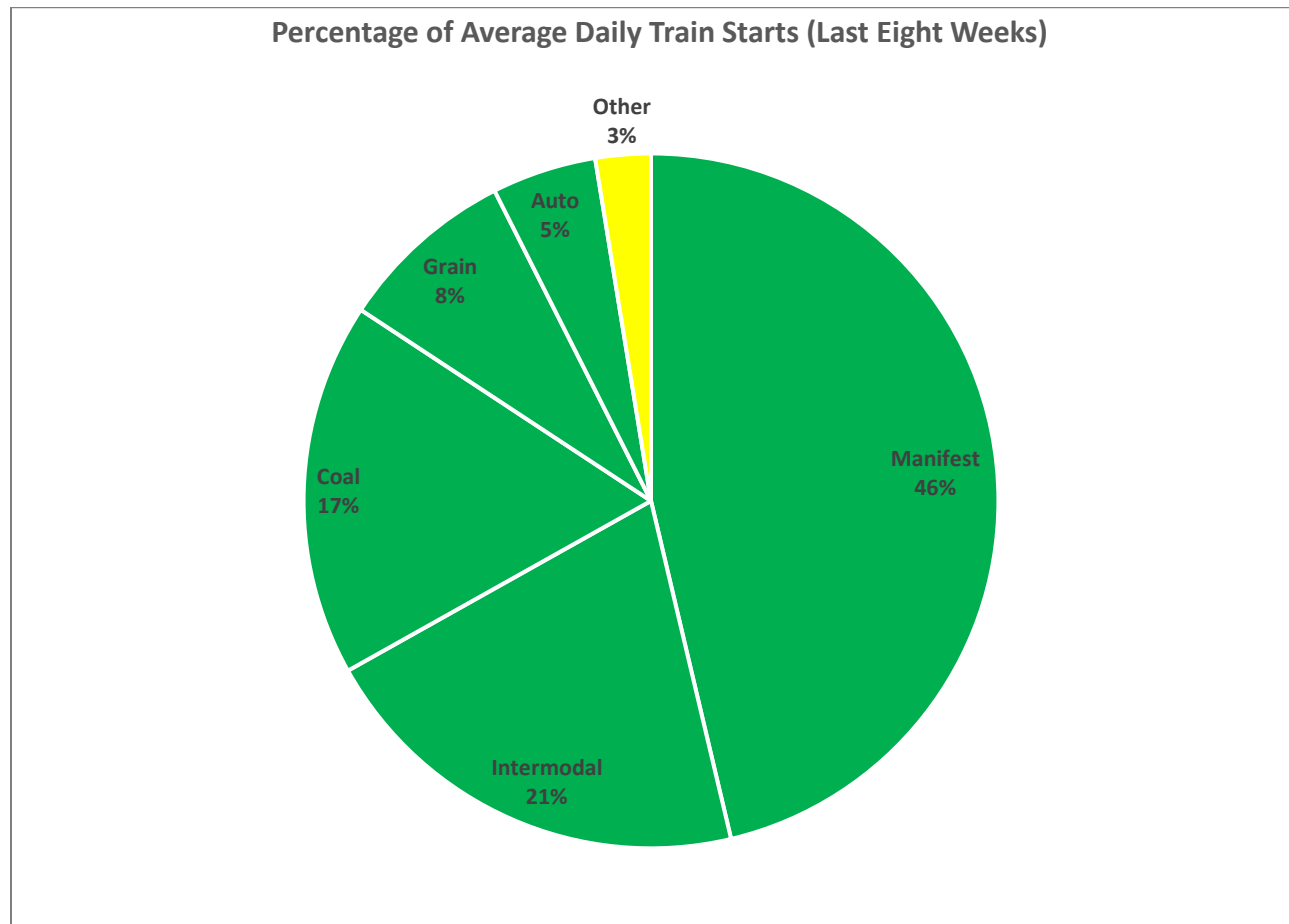
Dear Ms. Brown:

BNSF respectfully submits this update on the status of our service recovery plan filed on May 20, 2022, as modified in accordance with the Board's June 16, 2022 decision. The data in this report reflects BNSF's service performance during the week ending September 29. Last week BNSF achieved target for nine of our twelve KPIs, with one additional KPI within 95% of target. The following chart reflects our performance against our KPI targets over the past eight weeks:

	32	33	34	35	36	37	38	39	8 Week Avg
Train Speed	100%	101%	101%	101%	103%	101%	103%	102%	102%
Dwell	98%	100%	100%	103%	105%	104%	104%	104%	102%
Trains Holding	133%	148%	139%	151%	142%	153%	146%	147%	145%
Local Service	101%	100%	100%	102%	102%	101%	101%	102%	101%
Overall OTP	113%	117%	117%	116%	120%	120%	117%	115%	117%
Intermodal OTP	117%	120%	121%	120%	119%	118%	116%	116%	118%
Coal OTP	104%	107%	103%	103%	104%	109%	110%	107%	106%
Merch OTP	95%	98%	102%	103%	116%	120%	111%	108%	107%
Grain OTP	98%	107%	109%	88%	116%	108%	104%	91%	103%
Crude OTP	84%	86%	86%	81%	106%	95%	91%	87%	90%
Auto OTP	114%	116%	115%	113%	124%	121%	116%	109%	116%
Ethanol OTP	59%	76%	43%	110%	102%	101%	109%	97%	87%

To fully understand what BNSF's performance against the above OTP targets means to our overall customer base, it is important to consider how much volume each train type represents. The five train types for which BNSF's average performance over the past eight weeks has achieved target account for 97.4% of BNSF's average daily train starts over that period. The two train types for which BNSF's average performance has not achieved target—crude and ethanol—collectively account for only 2.6% of BNSF's average daily train

starts over that period. BNSF has thus achieved target for nearly all of the traffic moving on our network, which is also reflected by the sustained positive performance for the overall on-time performance number we report.



The Board has recently acknowledged that on-time performance against an original estimate time of arrival is a less effective measure for evaluating service performance for unit trains.¹ As evidenced by BNSF’s prior comments in this and other proceedings, BNSF agrees with that conclusion, particularly with respect to ethanol traffic.² Thus, while BNSF is pleased that our on-time performance has consistently achieved target for the vast majority of our traffic—and is trending positively for those train types that have

¹ *Reciprocal Switching for Inadequate Service*, Ex Parte No. 711 (Sub. 2), at 16 (Sept. 7, 2023).

² Service Recovery Plan of BNSF Railway Company, *Urgent Issues in Rail Service—Railroad Reporting*, Ex Parte No. 770 (sub. 1), at 7 n. 1 (May 20, 2022) (“BNSF believes that the Board’s formulation of OTP is problematic given its reliance on an original estimated time of arrival. BNSF has consistently expressed concerns about the use of original ETA as a reference point for any service metric.”); Interim Update of BNSF Railway Company, *Urgent Issues in Rail Service—Railroad Reporting*, Ex Parte No. 770 (sub. 1), at 4 (Dec. 2, 2022) (“As the disconnect between the calculation of Ethanol OTP as required by the Board and how our ethanol network actually operates still exists, our new target remains simply a good faith attempt to be responsive.”); Comments of BNSF Railway Company, *Demurrage Billing Requirements*, Ex Parte No. 759, at 16–18 (June 5, 2020) (“ETAs are, by definition, no more than estimates of expected movement across a system that is highly variable. Innumerable characteristics could cause changes to the original ETA of a particular movement, including industry behavior at origin or destination (if cars must be held en route).”)

not yet consistently achieved target—we encourage the Board in this proceeding and others to consider these metrics as only one part of the broader picture of our customers’ market-based service needs.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Adam Weiskittel', with a stylized, cursive script.

Adam Weiskittel
AVP & Associate General Counsel, Operations

CC: Mr. Michael Higgins, Office of Public Assistance, Government Affairs, and Compliance



BNSF Service Recovery Plan

Key Performance Indicators

	Baseline (March 4, 2022)	Current ¹	Progress Against Baseline	Target
Overall Velocity	24.4 mph	26.4 mph	+8.2% 	26 mph
Terminal Dwell	28.8 hrs	24.4 hrs	-15.3% 	25.5 hrs
Local Service Performance	87.6%	93.0%	+6.2% 	91%
Overall On Time Performance	62.4%	80.8%	+29.5% 	70%
Average Trains Holding	147.3	50.6	-65.6% 	95

¹ The data in this column reflects the data BNSF reported on October 4, which reflects performance in the week ending September 29.



BNSF Service Recovery Plan

Key Performance Indicators

	Baseline	Current	Progress Against Baseline	Target
Intermodal	66.9%	86.7%	+19.8pp 	75%
Coal Unit	66.6%	80.0%	+13.4pp 	75%
Merchandise	46.9%	70.5%	+23.6pp 	65%
Grain Unit	62.7%	68.1%	+5.4pp 	75%
Crude Unit	46.1%	60.8%	+14.7pp 	70%
Auto Unit	52.0%	76.6%	+24.6pp 	70%
Ethanol Unit	18.0%	48.6%	+30.6pp 	50%

TYE Unavailability and Cause

	9/17/23	9/18/23	9/19/23	9/20/23	9/21/23	9/22/23	9/23/23	9/24/23	9/25/23	9/26/23	9/27/23	9/28/23	9/29/23	9/30/23
Availability	59.1%	68.9%	72.9%	74.3%	74.3%	69.5%	61.4%	63.0%	71.7%	74.6%	75.9%	75.6%	70.6%	61.8%
Agreement	410	514	464	392	353	406	409	362	485	461	374	358	397	429
Absences	1,013	718	554	503	594	731	723	696	554	524	538	556	739	724
Company Business	32	79	95	125	110	60	38	54	101	143	141	98	36	17
FMLA/Medical Leave	399	287	215	191	176	255	296	297	224	173	166	150	194	289
Furloughed	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Miscellaneous	43	31	28	31	30	26	23	24	29	20	21	19	16	12
Training	12	49	78	73	47	14	4	12	38	70	61	47	10	3
Vacation/Paid Leave	1,241	1,091	981	983	1,027	1,200	1,307	1,229	1,056	940	935	1,002	1,136	1,251