

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. NOR 42175

ENTERED
Office of Proceedings
June 4, 2024
Part of
Public Record

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

**UNION PACIFIC RAILROAD COMPANY'S RESPONSES
TO THE SURFACE TRANSPORTATION BOARD'S REQUEST
FOR ROOT CAUSE ANALYSES REGARDING DELAYS
TO AMTRAK'S SUNSET LIMITED TRAIN 1**

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Pursuant to the Board's decision served February 13, 2024, as modified by the Board's decision served May 5, 2024, Union Pacific is submitting narrative explanations regarding root causes of the "Host-Responsible Delays on a Run-by-Run Basis" listed in Part I of the Appendix to the Board's February 13 Decision, where the "Host RR" was identified as "UP," for sixteen of the twenty runs of Amtrak's Sunset Limited Train 1. These narratives address more than 409 individual delays reported by Amtrak. Union Pacific will submit narrative explanations for the reported delays associated with the four remaining Train 1 runs on a rolling basis.

Union Pacific is providing narratives for the first sixteen trains in a file named "Host-Responsible Delays AMT1 11-09-21 to 09-02-22 - Highly Confidential.pdf," which is within the accompanying file "UP_Prod_060424_01_HC.zip."

The narratives reflect Union Pacific's diligent efforts to identify root causes of reported delays that occurred years ago by compiling and reviewing data from a variety of sources and consulting with dispatching personnel familiar with the operations and territories at issue to understand factors that would cause the observed outcomes.

Union Pacific is also providing documents containing supporting information for the root-cause explanations contained in the narratives. The documents can be found in folders identified by the Amtrak train designation (*i.e.*, AMT1) and train date within the accompanying files “UP_Prod_060424_01_HC.zip” and “UP_Prod_060424_02_HC.zip.”

Pursuant to the Board’s May 24 Decision, Union Pacific will produce any additional supporting data, documents, and other material underlying the narrative explanations by August 8, 2024.

Respectfully submitted,

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June 4, 2024

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2024, I caused a copy of the foregoing document to be served by email on Administrative Law Judge McCarthy and all parties of record in Docket No. NOR 42175.

/s/ Michael L. Rosenthal