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June 14, 2024
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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

**UNION PACIFIC RAILROAD COMPANY'S ADDITIONAL 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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On June 4, 2024, Union Pacific submitted narrative explanations regarding the 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 identified in the Appendix. With this filing, Union Pacific is submitting narrative explanations regarding the root causes of the remaining four trains.

Union Pacific is providing narratives for the four trains in a file named "Host-Responsible Delays AMT1 09-20-22 to 10-11-22 - Highly Confidential.pdf," which is within the accompanying file "UP_Prod_061424_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 file “UP_Prod_061424_HC.zip.”

Union Pacific was in the unfortunate position of being able to produce narrative explanations for only sixteen of twenty runs of Amtrak’s Sunset Limited Train 1 on June 4, 2024. We apologize for that. As Union Pacific explained in seeking an extension of time until July 24, 2024, and as the volume of its submissions demonstrates, its process of developing root-cause analyses is exceptionally labor intensive and time consuming. Union Pacific again invites the Board to consider, especially in view of the additional analyses and supporting data submitted on June 4, whether modifications of the process would be appropriate to narrow the scope or types of information requested.

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 14, 2024

CERTIFICATE OF SERVICE

I hereby certify that on this 14th 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