

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 RESPONSES
TO THE SURFACE TRANSPORTATION BOARD'S REQUEST
FOR ROOT CAUSE ANALYSES REGARDING DELAYS
TO AMTRAK'S SUNSET LIMITED TRAIN 2**

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July 24, 2024

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Pursuant to the Board's decision served February 13, 2024, as modified by the Board's decision served May 24, 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 the runs of Amtrak's Sunset Limited Train 2.

Union Pacific is providing the narrative explanations in a file named "Host-Responsible Delays AMT2 - Highly Confidential.pdf," which is within the accompanying file "UP_Prod_072424_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.*, AMT2) and train date within the

accompanying files “UP_Prod_072424_01_HC.zip” and
“UP_Prod_072424_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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July 24, 2024

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of July, 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