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September 25, 2024

BY ELECTRONIC FILING

The Honorable Cynthia T. Brown
Chief, Section of Administration, Office of Proceedings
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings
September 25, 2024
Part of
Public Record

Re: Ex Parte 711 (Sub-No 2) - *Reciprocal Switching for Inadequate Service*

Dear Ms. Brown:

The U.S. rail carrier affiliates of Canadian Pacific Kansas City, Limited (collectively “CPKC”) are submitting, pursuant to the Board’s Final Rule served April 30, 2024, and its Decision served August 23, 2024, files reporting CPKC’s data for the first two reporting weeks (September 7, 2024 through September 20, 2024) as required by 49 C.F.R. § 1145.8(b).¹ As requested in the Instructions provided by Board Staff, CPKC is also providing in the Appendix hereto a description of the operating divisions for which the ISP metric is being reported.

In the remainder of this letter, we explain to the Board and the public that the metrics being reported herewith should not be compared with those reported pursuant to Ex Parte No. 770, which CPKC is continuing to report in its monthly data submissions in Finance Docket No. 36500 (Sub-No. 6). The EP 711 Final Rule established methodologies for calculating both the on-time performance (“OETA”) metric and the industry spot and pull (“ISP”) metrics that are different in many respects from those underlying the EP 770 metrics.

Thus, while the levels of the EP 711 metrics may appear lower than those CPKC has previously reported, the differences do not reflect any decline in the level of CPKC’s service

¹ CPKC is filing publicly a version of each data file that omits the employee contact information sought by the Staff’s template, and CPKC is filing complete versions of those files under seal. CPKC requests that the Board maintain the contact information as confidential for the Board’s use only.

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performance. Figure 1 below shows OETA performance based on both sets of metrics, demonstrating that when measured using a consistent methodology there has been no decline.²

FIGURE 1
COMPARISON OF EP 770 AND EP 711 CPKC OETA METRICS

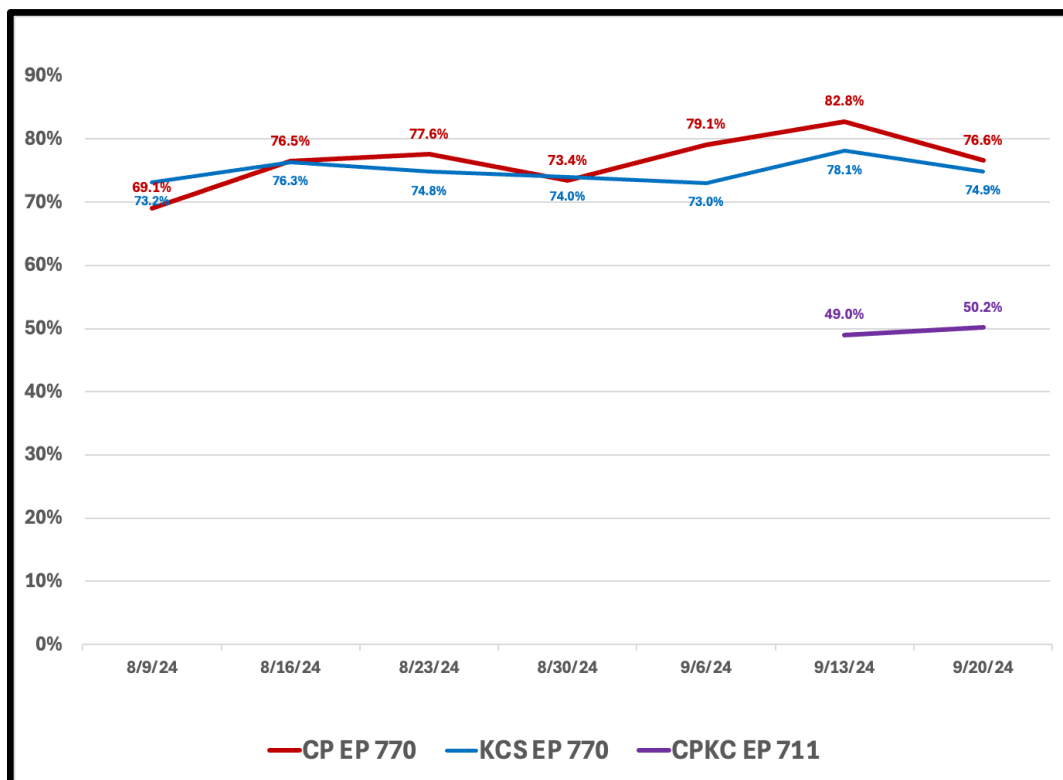
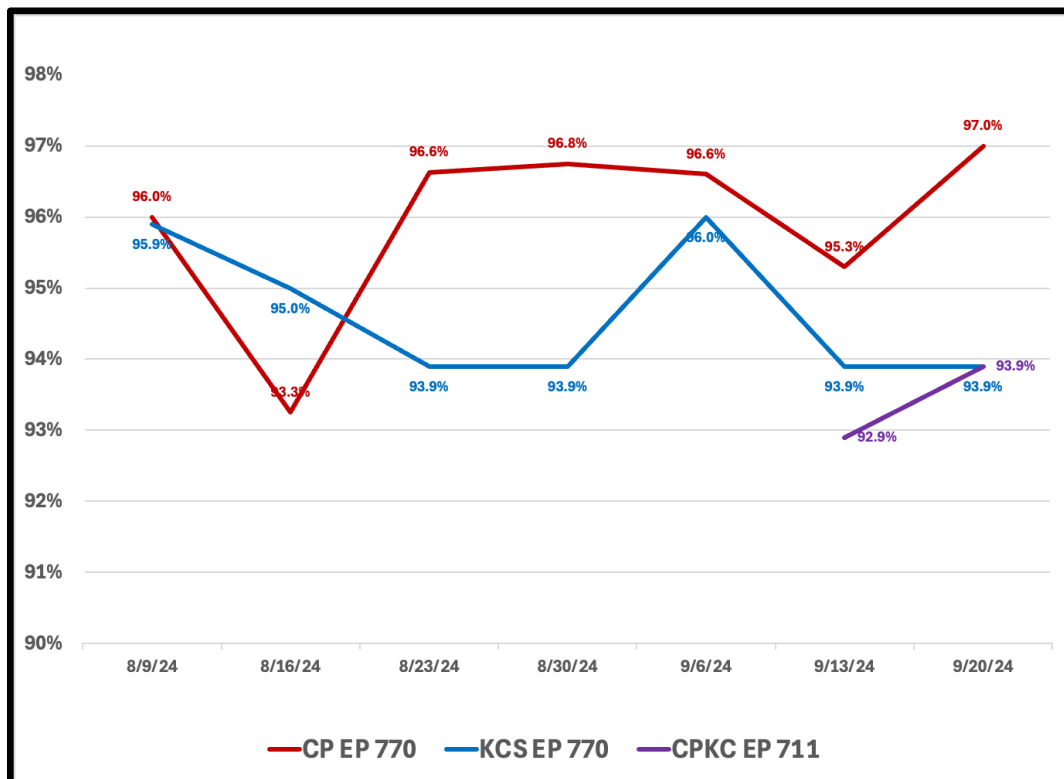


Figure 2 presents the same comparison of CPKC's ISP metrics, demonstrating that there has been no decline in performance when applying a consistent methodology.

² In compliance with the Final Rule, CPKC is reporting in this docket data for the full CPKC U.S. network. As the Board is aware, CPKC's reporting of EP 770 metrics in FD 36500 (Sub-Non. 6) continues to be for the separate CP/Soo and KCSR networks. CPKC will in due course transition to reporting on a CPKC network basis in FD 36500 (Sub-No. 6) as well.

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FIGURE 2
COMPARISON OF EP 770 AND EP 711 CPKC ISP METRICS



Please contact me with any questions.

Respectfully submitted,

David L. Meyer

*Attorney for Canadian Pacific
Kansas City Limited*

APPENDIX

DESCRIPTION OF CPKC OPERATING DIVISIONS FOR WHICH ISP DATA IS BEING REPORTED PURSUANT TO 49 C.F.R. §1145.8(B)

CPKC is reporting using the operating divisions described below. These divisions are different from the breakdowns used by CP/Soo and KCSR in their separate submissions pursuant to Ex Parte No. 770, including the continuing reporting that CPKC is providing in Finance Docket No. 36500 (Sub-No. 6). The seven CPKC divisions reflect the actual operating subdivisions of CPKC's U.S. network. The 15 total CP/Soo and KCSR breakdowns were typically smaller than an operating division and inappropriate for continued reporting for purposes of a CPKC network-wide submission.

Below is a map showing the territorial extent of the CPKC U.S. Operating Divisions described further below.



Operating Division

Description

NEUS (Northeast United States)

Territory labeled 1 in the map above. The NEUS Division encompasses CPKC's lines in the Northeast United States, including the former D&H lines as well as the U.S. portion of the former CMQ.

U.S. West

Territory labeled 2 in the map above. The US West Division encompasses CPKC lines between St. Paul, MN and the Canadian border crossings at

	Noyes, MN and Portal, ND; between River Junction, MN and Ottumwa, IA; and between Sabula Junction, IA and Randall Road, IL (west of Chicago, IL). Does not include CPKC lines between St. Paul, MN and River Junction or between River Junction and Chicago, IL via Milwaukee, WI (which are part of U.S. East).
U.S. East	Territory labeled 3 in the map above. The US East Division encompasses CPKC lines between St. Paul, MN and River Junction, MN and between River Junction and Chicago, IL via Milwaukee, WI.
Midwest	Territory labeled 4 in the map above. The Midwest Division encompasses CPKC lines between Ottumwa, IA and Shreveport, LA (via Kansas City) and between Kansas City and St. Louis.
Shreveport	Territory labeled 5 in the map above. The Shreveport Division encompasses CPKC lines between Shreveport Yard and Beaumont/Port Arthur, TX.
South East	Territory labeled 6 in the map above. The South East Division encompasses CPKC lines between Shreveport, LA and Dallas, TX; between Shreveport and Meridian, MS; and between Shreveport and New Orleans, LA. Excludes Shreveport Yard.
South West	Territory labeled 7 in the map above. The South West Division encompasses CPKC lines between Beaumont, TX and the International Bridge in Laredo, TX.