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

Re: Docket No. EP 711 (Sub-No. 2), *Reciprocal Switching for Inadequate Service*,
Submission of CSX Transportation, Inc.'s ("CSX") Data Reports and Reporting Methodology

Dear Ms. Brown:

Pursuant to the Board's orders served April 30, 2024 (the "Final Rule") and August 23, 2024 in the above-captioned proceeding, filed concurrently today please find: 1) CSX's weekly reports of the system-wide percentage of manifest shipments delivered within 24 hours of the Original Estimated Time of Arrival ("OETA"), as defined by the Final Rule, for the weeks ending Friday, September 13 and Friday, September 20; 2) CSX's weekly reports of the percentage (both system-wide and by operating division) of planned service windows during which CSX successfully performed industry spot and pull ("ISP"), as defined by the Final Rule, for the weeks ending Friday, September 13 and Friday, September 20; and 3) CSX's Explanation of Methodology for the metrics to be reported to the Board in this docket.

CSX's Explanation of Methodology provides clarity on our development of the metrics. It also describes a number of important differences between CSX's measurements for service reliability (i.e., Trip Plan Compliance, or "TPC") and local service (i.e., Customer Switch Data, or "CSD"), which are provided to customers via ShipCSX and formed the basis of CSX's service recovery reporting in EP 770-1¹, and the OETA and ISP metrics created by the Final Rule. Those differences create a significant disparity between CSX's TPC and CSD metrics and the ISP and OETA metrics CSX is now required to report to the Board:

Week	STB OETA	CSX TPC	STB ISP	CSX CSD
Sept 7 - 13	41.2%	79.8%	87.7%	94.0%
Sept 14 - 20	41.2%	78.7%	87.1%	93.6%

¹ As noted in CSX's Explanation of Methodology for EP 770-1, CSX's reported EP 770-1 data for system-wide manifest trip plan compliance reflected CSX's TPC measurement plus 24 hours for shipments scheduled to placement and arrival, excluding shipments destined for interchange. For EP 770-1 industry spot and pull, CSX utilized its CSD measurement, excluding intra-plant switches and cars planned to an interchange junction.

For OETA and TPC, the primary driver of the metric disparity is that cars arriving more than 24 hours early are counted as an OETA “miss.” As an example, assume a customer whose normal service day is Tuesday, and has a trip scheduled to end at 7:00pm Tuesday evening. If CSX places the customer’s cars at the customer facility or serving yard (as applicable) at 6:59pm on Monday evening, this would be an on-time delivery for TPC purposes, but would be counted as a miss for OETA purposes.²

Customer exceptions, as described in CSX’s Methodology Document, are another driver of the OETA/TPC discrepancy. The most frequent customer exception involves cars that are waybilled but not actually available for pull when CSX arrives. As an example, the customer clerk issuing a bill of lading may not be involved with the actual operations, meaning cars can be waybilled even though the customer’s operations team is not yet ready to release them. For TPC purposes, CSX would reset the OETA for any car that was not yet ready to pull, and code the reason for the reset as a customer exception, but CSX cannot reset the OETA for STB reporting purposes.

With respect to ISP and CSX’s CSD metric, the primary difference is that CSD is a car-level measurement for each service window, meaning each planned *car* is evaluated on an individual basis. Conversely, ISP is a service-window measurement, which captures all-or-nothing performance during a service window. As an example, if a customer requested a pull of 10 cars and CSX pulled 9 during the planned service window, CSD would consider this service window a 90% success rate. For ISP purposes, however, the success rate would be 0%.

CSX provides the above information as important context for the Board as we strive to foster understanding and be a part of the solution, as well as for customers and other third parties viewing CSX’s TPC and CSD metrics side-by-side with the OETA and ISP metrics submitted in this docket.

We would be glad to answer any questions the Board might have about our Explanation of Methodology or the OETA and ISP results submitted today.

Sincerely,

A handwritten signature in blue ink that reads "John P. Patelli". The signature is fluid and cursive, with a small dot at the end.

John P. Patelli

² Note that under CSX’s demurrage program, the customer’s demurrage clock will not start until 12:01am on the next scheduled service day after CSX places a railcar or notifies customers of constructive placement (i.e., Tuesday in this example).

CSX Explanation of Methodology EP 711-2

September 25, 2024

1. ***Original Estimated Time of Arrival (OETA):*** *The percentage of shipments on the carrier's system that moved in manifest service and that were delivered within 24 hours of OETA, out of all shipments on the carrier's system that moved in manifest service during that week. 49 C.F.R. § 1145.8(b).*

CSX will provide a weekly report of the percentage of loaded manifest shipments that planned to move in manifest service and that were delivered to destination within 24 hours (*i.e., shipments more than 24 hours early or more than 24 hours late would count as misses*) of the first OETA generated by CSX. For purposes of the weekly report, individual movements will be measured as follows:

Consistent with CSX's internal trip plan system, CSX will generate an OETA when a shipment creates a waybill in the CSX system or has been delivered to CSX in interchange.¹

- Diversions, or similar changes to the waybill itself, will create a new OETA when the destination is updated.

¹ Until creation of a valid waybill, CSX does not have sufficient information to initiate a shipment and CSX operating rules prohibit CSX's operations team from doing so. Accordingly, CSX's data systems do not allow it to create a trip plan and start the measurement of customer-originated shipments with the customer Bill of Lading (BOL). Instead, CSX processes are programmed to trigger upon creation of a valid waybill. The BOL provides information that is used to create a waybill, but the BOL must go through a verification process to ensure all necessary information is valid before a waybill can be created. The elapsed time between receipt of the BOL to the creation of the waybill is typically 10-15 minutes. However, in the event BOL information is incomplete, it will go into a suspense status and require resolution (*i.e., the resubmission of a corrected BOL*). The CSX system creates a waybill (and thus an OETA for the applicable trip) once the BOL has been validated and a route can be determined. Any change to that starting point would require a system overhaul that would take a substantial amount of time and could impact other internal processes. Accordingly, CSX's OETA measurement for customer-originated shipments will start at the waybill creation event, just as it does for CSX's train plan compliance measurement. However, for purposes of providing individualized OETA data, CSX will capture and record timestamps for both BOL and waybill creation events and will provide that data to eligible customers upon request in accordance with 49 CFR 1145.8(a).

Similarly, with respect to interchange, a foreign road's report of delivery to CSX, which is recorded as an EDI 418 message, requires verification in CSX's system before a trip plan is created. On occasion, CSX receives an EDI report of delivery even though the foreign road has not actually delivered the cars in interchange. Accordingly, CSX compares the EDI "deliver to" event to the inbound AEI scan (if available) when the shipment has passed through the designated AEI reader for delivery to CSX in interchange (often, but not always, the EDI "deliver to" message and the AEI scan are contemporaneous). Because there are times when one or both of these inputs are either missing or incorrect, the EDI "deliver to" and AEI timestamps are compared to other validating events to verify that interchange traffic was delivered. Based on the available inputs, CSX's system creates a "received in interchange" event. The posting of the "received in interchange" event triggers the CSX system to build a route to destination with a train schedule and an OETA. Accordingly, CSX's OETA measurement for interchange shipments will start at the "received in interchange" event.

- OETA will not update or reset for any other reason, including customer exceptions² and bad ordered cars.³

Population: CSX will measure loaded manifest shipments. The population excludes MoW equipment, intermodal, unit trains, manifest cars that are waybilled on unit trains, empty shipments, and shipments for which there is insufficient data to measure OETA performance.⁴

2. ***Industry Spot and Pull (ISP):*** *For each of the carrier's operating divisions and for the carrier's overall system, the percentage of planned service windows during which the carrier successfully performed the requested local service, out of the total number of planned service windows on the relevant division or system for that week. 49 C.F.R. § 1145.8(b).*

Measurement: CSX will measure ISP utilizing its Customer Switch Data (CSD), which measures locals, switchers, and yard jobs that switch merchandise customers. CSD compiles the planned customers, service days, and customer windows based on the operating plan for each train. It then produces a Switch Planning Tool that identifies the customers and cars that are planned for that service day for the assigned CSX crew.

Service Window: CSX's service window is based off the planned trains' on duty time, plus 12 hours. The planned on duty times are static and do not fluctuate based on when the crew comes on duty; the train has a planned duty time and serves as the basis of the service window. For example, if a first shift job's on duty time is profiled as 7:00am, the planned service window is 7:00am to 7:00pm.

Makes and Misses: CSX will calculate makes/misses for each service window as follows:

- If all planned cars are placed/pulled on a customer's scheduled service day within the planned service window, CSX will count that service window as a make.
- If any planned car is not pulled/placed on a customer's scheduled service day within the planned window, and CSX is responsible for that car not being pulled/placed, CSX will count that service window as a miss (even if only one car is not pulled/placed, and even if other cars are not pulled/placed for a customer-related reason).

² The most common customer exception occurs when a customer notifies CSX that it has released cars for CSX to pull, but the cars are not actually available to be pulled when CSX services the facility. Other examples include, but are not limited to, the presence of a blue flag or derail at the customer facility that prevents CSX from providing service. In CSX's internal trip plan system, CSX would reset the OETA for any car that was not yet ready to pull, and code the reason for the reset as a customer exception. However, in compliance with the weekly reporting requirements of 49 CFR 1145.8(b), CSX will not reset the OETA for customer exceptions.

³ In CSX's internal trip plan system, a car's trip (and the corresponding ETA for the shipment) resets when the car enters bad order status. When the car has been repaired, a new trip and ETA are created. However, in compliance with the weekly reporting requirements of 49 CFR 1145.8(b), CSX will not reset the OETA for cars entering bad order status.

⁴ An example of insufficient data would be a shipment missing placement or timestamp events (such as where placement of a car was never recorded, with the next recorded event being the car's release). This is an uncommon data issue, but one that would prevent CSX from measuring the OETA.

- If some cars are pulled/placed on a customer's scheduled service day within the planned service window, and only the customer is responsible for the cars not pulled/placed, CSX will count that service window as a make.
- If any planned service on a customer's scheduled service day is completed outside of the planned service window, CSX will count that service window as a miss.
- If no planned cars are pulled/placed on a customer's scheduled service day within the planned service window, and only the customer is responsible for the cars not being pulled/placed, CSX will not count the service window as either a make or a miss.
- Any switch performed on a non-scheduled service day will not be counted as either a make or a miss as it was not performed on a scheduled day of service.

Operating Divisions: Pursuant to the Board’s EP 711-2 reporting template and instructions, CSX will report weekly ISP results for the following operating divisions:

Midwest – North
Midwest – South
Northeast – North
Northeast – South
Southeast – North
Southeast – South
Southwest – North
Southwest – South
Offline/Other⁵

For purposes of EP 711-2 reporting, CSX has simplified its operating divisions by breaking the network into four distinct regions, with subcategories for North and South. This structure also reflects operating changes that have occurred since CSX identified its operating divisions for EP 770-1 reporting purposes. In addition, the Northeast-North region now includes the former Pan Am territory, which was not included in EP 770-1 reporting.

For convenience, a map depicting the operating divisions is attached, and a comparison chart between the EP 770-1 and EP 711-2 operating divisions is included below:

EP 770-1 Operating Division	EP 711-2 Operating Division
Midwest - North	Midwest - North
Midwest - Great Lakes East	Midwest - North
Midwest - Great Lakes West (minus Avon zone)	Midwest - North
Midwest - Great Lakes West (Avon zone only)	Midwest - South
Midwest - Central	Midwest - South
Northeast - North	Northeast – North (now includes former Pan Am)
Northeast - Central	Northeast - South
Northeast - South	Northeast - South
Southeast - East	Southeast - North
Southeast - South	Southeast - South
Southeast - Central	Southeast - South
Southeast - North	Southwest - North
Midwest - South	Southwest - North
Southeast - West	Southwest - South

⁵ Offline/Other locations are points off the CSX network where CSX has the right to operate (such as via trackage or exclusive freight easement rights) and perform delivery, but does not control or dispatch.