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UNIVERSITY OF HOUSTON

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Dr. Kristen Monaco
Director, Office of Economics
Surface Transportation Board
395 E Street SW
Washington, DC 20423

ENTERED
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Re: Waybill Request WB25-13

March 28th, 2025

Dear Dr. Monaco:

I am writing to request access to specific data from the Confidential Carload Waybill Sample (CCWS) for academic research purposes. As a UH Bauer DBA candidate and Professor of Project Logistics at the University of Houston's Cullen School of Engineering, I am conducting doctoral research on specialized railcar fleet capacity for heavy power equipment transportation in North America to support economic analysis of delivering power generation and transformer equipment on time to AI Data Center construction.

RESEARCH PURPOSE AND OBJECTIVES:

My academic research aims to analyze the current and future adequacy of specialized railcar fleets in supporting critical U.S. infrastructure development. Specifically, my research objectives are to:

1. Analyze utilization patterns and capacity constraints of specialized multi-axle railcars (specifically 8-axle, 12-axle, 16-axle, 18-axle, 24-axle, and 32-axle configurations) used for transporting oversized and overweight components
2. Develop forecasting models to estimate future specialized railcar needs based on projected growth in data center construction and other critical infrastructure
3. Identify potential transportation bottlenecks that could impact national economic development
4. Contribute to academic literature on transportation logistics with policy implications for infrastructure planning

DATA REQUESTED:

To achieve these research objectives, I am requesting access to the following specific data from the Confidential Carload Waybill Sample for the past 10-15 years (2010-2025 or as available):

1. Records for shipments utilizing specialized flat car equipment (STCC 37-422-XX series), with particular focus on:
 - 8-axle railcars
 - 12-axle railcars



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- 16-axle railcars
 - 18-axle railcars
 - 24-axle railcars
 - 32-axle railcars
2. Geographic origin-destination pairs for these movements (BEA economic areas)
 3. Car type information for these specific multi-axle equipment configurations
 4. Temporal data (quarter of movement) to identify seasonal patterns
 5. Weight information to identify oversize/overweight movements
 6. Revenue data (masked format is acceptable)

PRELIMINARY WORK AND JUSTIFICATION FOR CONFIDENTIAL DATA:

As preliminary work for this research, I have compiled an Excel spreadsheet using open source information on specialized railcars that documents the various configurations, specifications, and AAR allowed usage periods for 8, 12, 16, 18, 24, and 32-axle equipment. This open-source compilation demonstrates both the limited public information available on these assets and the need for more comprehensive data to conduct meaningful academic analysis.

The Public Use Waybill Sample is insufficient for this academic research because:

1. It does not provide the necessary granularity to identify specific multi-axle railcar movements (8, 12, 16, 18, 24, and 32-axle) due to aggregation of equipment types
2. The geographic aggregation prevents analysis of specific transportation corridors essential to the research methodology
3. The research requires identification of specialized heavy haul movements that can only be discerned through detailed equipment and commodity data
4. Historical data spanning 10-15 years is necessary to identify long-term trends in specialized railcar utilization, particularly given the extended life cycles and limited quantity of these specific multi-axle assets

My research methodology employs econometric modeling that necessitates this level of detail across an extended timeframe to produce statistically valid results. The longer time series is especially important given that many of these specialized railcars (particularly in the 8, 12, 16, 18, 24, and 32-axle configurations) have AAR allowed usage periods that are expiring, creating potential capacity constraints that can only be identified through longitudinal analysis.

CONFIDENTIALITY ASSURANCES:

I fully understand the sensitive nature of this data and will comply with all confidentiality requirements in 49 C.F.R. § 1244.9. Specifically:

1. The data will be used solely for the academic research purpose described above



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2. All analysis will aggregate shipper data to include at least three shippers in compliance with confidentiality provisions
3. No data identifying individual railroads will be disclosed
4. The data will be stored securely on University of Houston encrypted servers
5. Access will be limited exclusively to me as the researcher
6. The data will be destroyed or returned upon completion of the research or expiration of the agreement
7. All research findings will be submitted to the STB for review prior to publication

RESEARCH WALL OF SEPARATION:

I acknowledge that I also serve as Chief Operating Officer at UTC Overseas. To ensure complete separation between my academic research and professional activities:

1. This request is made exclusively in my capacity as a doctoral researcher and professor at the University of Houston
2. No CCWS data will be shared with, or accessible to, any UTC Overseas personnel
3. The University of Houston will maintain strict oversight of data handling protocols
4. All published research will be made publicly available through academic channels

This strict separation will ensure that the data is used solely for academic research purposes with no commercial application. I understand that any violation of these terms could result in sanctions under 49 C.F.R. § 1244.9(g).

Thank you for your consideration of this academic research request. I would be happy to provide any additional information about my research methodology or data security protocols, including sharing the open-source specialized railcar inventory spreadsheet I have developed.

Sincerely,

DocuSigned by:

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Marco Poisler

Adjunct Professor, Project Logistics / UH Bauer DBA Candidate
Supply Chain, Transportation, & Logistics Program
Cullen School of Engineering
University of Houston
Houston, Texas 77004
mapoisle@central.uh.edu
+1 (646) 235-0384

Cc: Dr. Johannes Habel / UH Bauer Associate Professor – DBA Program
Margaret Kidd/ UH Cullen College of Engineering /SCLT Program Director