

Surface Transportation Board
Washington, D.C. 20423-0001
Office of Economics

May 5, 2025

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

Re: Waybill Request WB25-13

Dear Mr. Poisler:

The Surface Transportation Board (STB) has received your request under 49 C.F.R. § 1244.9(c) of March 28, 2025, for permission to access the confidential Carload Waybill Sample (CCWS) with masked revenues. Your request explained that the requested data would be used to analyze the current and future adequacy of specialized railcar fleets to support critical U.S. infrastructure development. Specifically, you requested access to the CCWS for the years 2010 – 2025 with masked revenue, STCC 37-422-XX series car type information, specific multi-axle equipment configurations, BEA economic areas, and weight information. In addition, your request stated that these particular data were required because the Public Use Waybill Sample detail is insufficient for your academic research to produce statistically valid results. Notice of your request was published in the *Federal Register* on April 4, 2025, and no objections were received.

Based on the complete and sufficiently detailed explanations and justifications contained in your request, you will be authorized to access the requested data. Specifically, you will have access to the CCWS for the years 2010 – 2023 with masked revenues for railroad traffic utilizing STCC 37-422-XX series car type information, BEA economic areas, and weight information. The 2024 and 2025 datasets are not ready to be released at this time and may be requested on a later date. These data may only be used for the purpose detailed in your request and may not be used for any other purpose such as private, commercial consulting. ***This approval becomes effective when signed agreements from the individuals listed below are received by the STB:***

a) *Marco Poisler*

The expiration date for this agreement is May 31, 2026. Unless you seek and obtain a renewal from the STB, this agreement upon expiration obligates you to return or destroy all copies of the data (see item 6 of the agreement).

Several aspects of the CCWS limit the conclusions that may be drawn from analysis of the CCWS: 1) the CCWS is a sample, and 2) the CCWS is based on terminating shipments from

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relatively large carriers. Only those railroads with more than 4,500 annual terminating carloads are included in the sample. The limited sampling of small railroads may have a substantial effect on studies covering areas served predominately by non-sampled railroads. For additional information on the CCWS, see *Reference Guide* @ <https://www.stb.gov/reports-data/waybill/> on the Board's website.

The rules for release of waybill data are codified at 49 C.F.R. § 1244.9. The CCWS contains confidential shipper and railroad data. As a result, the CCWS is commercially sensitive and has the potential to cause competitive harm to shippers and railroads if disclosed. Therefore, the following agreement must be signed, and a copy of the signature pages returned to the STB, before any waybill data can be used.

Your signature acknowledges your agreement to comply with the following:

1. You will use the CCWS data released to you solely for the purpose requested.
2. Absent permission from the STB, you shall make the information contained in the CCWS (including work product and analyses derived from the CCWS) available only to the individuals identified above. The STB may approve access for additional individuals within your entity working on the particular project or study requiring the waybill data. Each such additional individual must review and sign this agreement, and return a copy of the signature page to the STB.
3. You will not release any CCWS data (including work product and analyses derived from the CCWS) to anyone who has not signed this agreement and been approved for access by the STB until the STB has had the opportunity to review the materials proposed for disclosure to ensure confidentiality.
4. You acknowledge that, in addition to the restrictions described in paragraphs 2 and 3 above, you are bound by the STB's rules governing use and disclosure of CCWS data. These include the confidentiality provisions of 49 C.F.R. §§ 1244.9(f)(1)-(3), which require that "[a]ny shipper data obtained from the Waybill Sample shall not be publicly released unless the data are aggregated to include at least three shippers." In addition, you agree not to disclose CCWS data that permits identification of an individual railroad.
5. You will refer any requests for CCWS data in your possession (including work product and analyses derived from the CCWS) to the STB for processing and will inform the requesting party of such referral to the STB. If you are compelled by law or order of a governmental or judicial body to release CCWS data, you shall notify the Board in writing within three days of any determination that CCWS data must be released, and in no event later than five days before the CCWS data is scheduled to be released.

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6. In order to retain access to the CCWS beyond the expiration date specified above, you must submit a written request for an annual extension of the agreement no later than thirty days prior to the expiration date and the renewal request must be approved by the Office of Economics. **If an annual agreement is not signed and approved, you must certify by no later than the expiration date that all CCWS data (including all work product and analyses derived from the CCWS) obtained under this agreement has been destroyed or returned to the STB.**
7. Failure to request an extension (if necessary), or destroy or return CCWS data when required, may prevent any future release of CCWS data to you. Violations of this agreement may subject you to sanctions by the Board.

After all parties have signed and returned this agreement, please contact waybill@stb.gov to make the necessary arrangements to have a copy of the data sent to you. The STB will provide the data by email through file transfer protocol. Prior payment of processing and mailing cost of **\$69 (\$69 per confidentiality agreement)** is required. Payment can be made through the Board's electronic payment system, Pay.gov. Your payment through Pay.gov will generate a unique Pay.gov transaction number, which you will need to provide with your signed agreement. Pay.gov accepts payment through bank accounts, credit cards, debit cards with a MasterCard or Visa logo, and digital wallet. Payment can also be made directly to the Board via check or money order.

Sincerely,

KRISTEN
MONACO

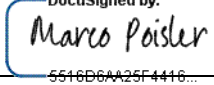
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KRISTEN MONACO
Date: 2025.05.06
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Kristen Monaco, PhD
Director
Office of Economics

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I have read and understand the conditions for release of the CCWS data. I agree to comply fully with these conditions and the provisions of this confidentiality agreement. No later than thirty days before the agreement expires, I will request an extension of this agreement, if necessary. If no extension is requested, I will return or destroy all CCWS data and certify that I have done so. I have the authority to sign this agreement.

By: Marco Poisler

DocuSigned by:

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Signature



C. T. Bauer College of Business
UNIVERSITY OF HOUSTON

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

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



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:

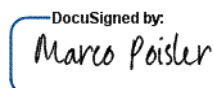
I acknowledge that I also serve as Chief Operating Officer at UTC Overseas. To ensure complete separation between my academic research and professional activities:

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

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