

June 6, 2025

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Kristen Monaco
Director & Chief Data Officer
Office of Economics
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

ENTERED
Office of Chief Counsel
August 18, 2025
Part of
Public Record

Re: Waybill Request

Dear Ms. Monaco:

Bi-State Development is requesting other user access to detailed Carload Waybill Data from the Surface Transportation Board for:

- Bi-State Development (BSD)
- Cambridge Systematics (CS) as consultant to support BSD
- DB E.C.O. North America Inc. (DB) as consultant to support BSD

BSD and its consultants, CS and DB, are performing a study, the *Southwestern Illinois Freight Railroad Network Analysis and Improvements Program*, to evaluate trends of rail traffic volumes and routing in order to understand the users of St. Louis rail terminal and beneficiaries of investments made by regional partners, with the goal of establishing both a package of regional infrastructure improvement projects and a formal partnership similar to the Chicago Regional Environmental and Transportation Efficiency (CREATE) Program. A small working group comprised of the entities listed above, as well as the Terminal Railroad Association of St. Louis (TRRA), Norfolk Southern (NS), and Alton and Southern Railway (A&S, subsidiary of Union Pacific), will participate in this study. Technical work will be performed by CS and DB consultants. The Waybill Sample is the only source that will provide the commodity and detailed routing data needed by the study partners in order to evaluate the impact of rail traffic originating, terminating, and moving through the St. Louis Region.

BSD is requesting the complete Waybill Sample with masked revenue for 2021, 2022 and 2023 railroad traffic originating, terminating, or passing through the St. Louis Region. The St. Louis Region is defined for purposes of this study as six (6) counties in western Illinois and eastern Missouri: St. Louis City (MO), St. Louis County (MO), Jefferson County (MO), St. Clair County (IL), Madison County (IL), and Monroe County (IL).

The parties listed above will respect the confidentiality of the Waybill Sample and agree to observe the STB conditions, including:

- The “raw” Waybill Sample data shall be made available only to those BSD employees and contractors (CS and DB) who have a need for the data in conducting approved studies requiring the use of Waybill data.
- The Waybill Sample data shall be used solely for the purposes requested.
- None of the Waybill Sample data, or results generated from analyses thereof, will be released to the public unless the data are aggregated so that they contain at least three FSACs.

If you have any questions concerning this request for Bi-State Development, please contact me at [MCLamie@BiStateDev.org](mailto:MC.Lamie@BiStateDev.org) or 314-982-1562.

Per 49 CFR 1244.9, an original and two copies of this request are enclosed. Per the list of charges in 49 CFR 1002.2, enclosed is a check for \$707 (the \$500 fixed fee portion, plus \$69 for each party listed above) in payment of the filing fee.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary C. Lamie".

Mary C. Lamie
Executive Vice President of Multi Modal Enterprises
Bi-State Development