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Comment on Updating Class I Rail Carrier Reporting Requirements– Docket No. EP 787 Office of Chief Counsel
November 21, 2025

To the Surface Transportation Board:

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Public Record

Thank you for the opportunity to comment in Docket No. EP 787. I am writing on behalf of Trinidad Benham Corporation, a nationwide processor and distributor of rice, beans, and other agricultural products that rely heavily on rail service for the movement of bulk ingredients to our facilities.

1. Position on Ending PTC Supplemental Reporting

Trinidad Benham does not take a position on the proposal to eliminate supplemental Positive Train Control (PTC) reporting. PTC implementation is complete, and we defer to the Board and the Class I carriers on whether the supplemental reporting continues to provide regulatory value.

2. Strong Support for New Weekly Service Reporting Requirements

We strongly support the Board's proposal to require weekly reporting of:

- Original Estimated Time of Arrival (OETA) performance, and
- Industry Spot and Pull (ISP) performance.

A. Why OETA Reporting Matters to Shippers

Our production plants build daily and weekly operating schedules around the ETA communicated by the delivering railroad. These ETAs determine:

- When labor and equipment must be staffed and staged
- When processing can begin
- Whether outbound customer commitments can be met
- Whether additional truckloads must be procured to maintain inventory continuity

When a car arrives late—or early without notice—or when switches are missed, the result is not merely inconvenience. These events create:

- Idle labor
- Disrupted production schedules
- Increased operational costs
- The risk of demurrage
- The need to carry costly extra inventory buffers
- And most importantly, the risk of missing customer ship dates

For our company, missed ship dates carry direct financial penalties, in addition to reputational and service consequences that are harder to quantify.

Consistent, system-wide OETA data will help both the Board and shippers understand reliability trends, identify emerging regional issues, and hold carriers accountable to the service expectations they themselves set when providing ETAs.

B. Why ISP Reporting Enhances Accountability

The ISP metric is equally important. Local service—spots and pulls—is where rail service is most directly felt by shippers.

Missed switches, unfilled spot requests, and canceled service windows derail plant operations even when mainline transit is otherwise performing well. Without transparency into ISP performance, shippers cannot distinguish isolated issues from systemic ones, nor can we effectively plan production, staffing, or inventory.

Weekly ISP data at both the system and division level would give shippers and the Board the visibility necessary to understand whether local service aligns with the commitments the carriers make to customers.

C. Low Burden for Carriers, High Value for Shippers

The carriers already track this information internally. Making it available in a consistent, weekly format imposes minimal additional burden but substantially strengthens system oversight. The proposal strikes the right balance between transparency and practicality.

3. Conclusion

For shippers like Trinidad Benham, rail service reliability has significant financial and operational implications. The Board's proposed weekly OETA and ISP reporting requirements would provide meaningful visibility into the two dimensions of service that most directly determine whether we can meet our own commitments to customers.

We respectfully urge the Board to adopt the new weekly service metrics as proposed.

Thank you for your consideration.

Respectfully submitted,

/s/

Ron Ester
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Trinidad Benham Corporation