



310355

ENTERED
Office of Chief Counsel
November 24, 2025
Part of
Public Record

November 24, 2025

The Honorable Patrick J. Fuchs, Chair
The Honorable Michelle A. Schultz, Vice Chair
The Honorable Karen J. Hedlund, Member
Surface Transportation Board
395 E Street, SW
Washington, DC 20423
VIA ELECTRONIC SUBMISSION

RE: **DOCKET NO. EP 787**
UPDATING CLASS I RAIL CARRIER REPORTING REQUIREMENTS
NOTICE OF PROPOSED RULEMAKING

Dear Chair Fuchs, Vice Chair Shultz, and Member Hedlund:

The National Industrial Transportation League ([NITL](#) or The League), submits this letter supporting the joint Freight Rail Customer Alliance (FRCA) and National Coal Transportation Association (NCTA), and the Private Railcar Food and Beverage Association (PRFBA) filed comments in response to the Surface Transportation Board's (STB or Board) above referenced Notice of Proposed Rulemaking (NPRM).

NITL was founded in 1907. Its member companies range from some of the largest users of the nation's transportation systems to smaller companies engaged in the shipment and receipt of goods – spending billions of dollars on freight annually. The League is the “voice of the shipper” on freight transportation policy matters involving all modes. Its members move a variety of commodities via rail including agriculture, chemicals, steel, scrap, paper/pulp/forest, retail, and fuel products. NITL members require reliable and cost-effective freight rail transportation services to meet their production and customers' requirements.

The League strongly believes that required Class I data reporting, especially in those areas where reportable data has been lacking, offers numerous benefits: enhances overall transparency of railroad service performance; facilitates better decision-making at the STB, and among shippers, communities and customers; identifies trends; and provides a better ability to foresee and mitigate challenges or problems. In 2020, NITL joined with FRCA, NCTA, and PRFBA in urging the Board to expand its data reporting to include a measure of first-mile/last-mile (FMLM) service data to overcome a significant gap in the Board's oversight of railroad performance.¹ Without FMLM data reporting by the Class Is, the Board had a blind spot as to this vital transportation segment.

¹ Letter from FRCA, NCTA, National Industrial Traffic League, and Private Railcar Food and Beverage Association, Inc., dated August 31, 2020, and follow-up letter dated October 8, 2020, both available at <https://www.stb.gov/news-communications/non-docketed-public-correspondence/>.

The Honorable Patrick J. Fuchs
The Honorable Michelle A. Schultz
The Honorable Karen J. Hedlund
November 24, 2025
Page Two

As such, NITL commends the Board for pursuing this data initiative notably in proposing to require Class I reporting of two critical metrics for the Board's objective in ensuring rail service reliability and accountability an: 1) original estimated time of arrival ("OETA") metric and 2) industry spot and pull ("ISP") to monitor service reliability and address possible future regional and national service lapses.

NITL and other shipper interests were pleased when the Board adopted OETA and ISP as relevant service metrics in EP 711 (Sub-No. 2), ***Reciprocal Switching for Inadequate Service***. The Eighth Circuit's action in vacating and remanding reciprocal switching as a remedy for substandard OETA and ISP values in no way undermines or eliminates the need for this data. NITL agrees with the joint FRCA/NCTA comments and PRFBA comments discussing the importance of permanently requiring the Class I reporting of OETA and ISP.

The League agrees with FRCA/NCTA and PRFBA in their respective support of requiring Class I reporting of unit and intermodal trains performance data. While NITL members are not necessarily unit train shippers, nearly all are intermodal and boxcar shippers. Any movement – unit train, intermodal, boxcar, manifest traffic – affects the performance (or lack thereof) of the entire network. Board should restore the level of reporting for unit and intermodal trains that existed until the Board's decision in *Urgent Issues in Freight Rail Service – Railroad Reporting*, EP 770 (Sub-No. 1), served January 31, 2024. Moreover, NITL supported the FRCA/NCTA jointly filed petition filed on February 20, 2024, for reconsideration which remains pending.

NITL looks forward to this NPRM moving forward as expeditiously as possible and welcomes the Board's continued focus on data modernizing. Focusing on requiring rail carrier data reporting that is commensurate with today's market conditions and shipper requirements, will help the STB hold railroads accountable for reliable service and overall performance.

Respectfully submitted,



E. Nancy O'Liddy
Executive Director