

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

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UPDATING CLASS I RAIL CARRIER REPORTING REQUIREMENTS

COMMENTS OF THE NATIONAL GRAIN AND FEED ASSOCIATION

The National Grain and Feed Association (“NGFA”) hereby provides its comments in response to the Notice of Proposed Rulemaking (“NPRM”) issued by the Surface Transportation Board (“STB” or “Board”) in this Docket on September 30, 2025. The NGFA’s comments respond to the Board’s invitation for industry stakeholders’ views on whether to include unit train traffic in the proposed original estimated time of arrival (“OETA”) metric and an industry spot and pull (“ISP”) metric. The NGFA believes that these metrics should include unit trains, for the reasons expressed below.

I. Identity and Interest of NGFA

The NGFA, established in 1896, consists of grain, feed, processing, exporting and other grain-related companies that operate facilities handling U.S. grains and oilseeds. Its membership includes grain elevators; feed and feed ingredient manufacturers; biofuels companies; grain and oilseed processors and millers; exporters; livestock and poultry integrators; and associated firms that provide goods and services to the nation’s grain, feed and processing industry. The NGFA consists of 24 affiliated State and Regional Grain and Feed Associations.

Nationwide, there are 9,683 grain and feed facilities that employ 175,737 employees directly and help support 1.16 million total U.S. jobs. The industry also helps generate \$85.9 billion in wages, \$401.7 billion in economic impact, and \$32.7 billion in taxes across the country. For more information and a state-by-state breakdown of data, visit <https://www.ngfa.org/industry-impact/>.

Many the NGFA members ship agricultural and other commodities by unit trains, also referred to as shuttle trains in the agricultural industry. These trains range in length from 90 to 147 railcars, which can be grain hopper cars, tank cars for ethanol transportation, or other railcar types.

II. Comments on the NPRM

In the NPRM the Board has proposed weekly Class I carrier reporting of two service metrics in addition to the existing data reported by Class 1 railroads: an OETA metric and an ISP metric. NPRM at 4. The Board previously declined to include shuttle/unit trains in similar reporting metrics proposed in EP 711 (Sub. No. 2), *Reciprocal Switching for Inadequate Service* (served April 30, 2024)(EP 711-2), primarily because the Board’s perception of shuttle/unit train service was that “while manifest traffic runs on scheduled trains, unit trains generally do not have schedules. They run at various, usually irregular times.” EP 711-2 at 38. The Board also concluded that “although some railroads have trip plans based on the unique schedule for each unit train that are applied to each car on the train, CN, CSXT, and NSR do not currently produce trip plans for unit trains. It would be unduly burdensome to require those carriers to produce trip plans (including an OETA) for unit trains for purposes of the reliability standard under part 1145, factoring in that problems with the delivery of unit trains can also be captured by the service consistency standard in part 1145.” *Id.* (citations

omitted).¹

The NGFA respectfully disagreed with the Board’s decision to exclude shuttle/unit trains from the OETA metric in particular in *EP 711-2*. Specifically, the NGFA pointed out that the failure of Class I carriers to deliver shuttle/unit trains in a timely manner can result in significant harm to the shipper/receiver, the shipper’s/receiver’s customers, and in some cases harm to livestock dependent on feedstock delivered by railroad in unit trains, as the Board experienced in 2022 with Docket No. FD 36609, *Foster Poultry Farms – Ex Parte Petition for Emergency Service Order*.

NGFA continues to disagree with the view that shuttle/unit trains do not have the same need to be within specified service windows while manifest trains do. The movement of *all* railcars across the Class 1 railroads’ respective systems is scheduled and measured tightly, even if such schedules are not met. Moreover, the overall concept and goal of shuttle/unit train traffic is to establish relatively continuous, ratable deliveries of very large volumes of commodities, whether they are grain, ethanol, coal, or other bulk commodities. The end users of such large volumes plan their operations accordingly, such that the failure of a rail carrier to meet its service representations to a shipper can result in proportionally greater harm to the shipper/receiver and the shipper/receiver’s customers than manifest traffic, as was experienced by Foster Farms in 2022.

The NGFA also respectfully disagrees that Class 1 railroads do not have “trip plans” for unit trains. The plans may not take the same form as a manifest train trip plan but shuttle trains, unit trains, or similar service offerings move on all six of the Class I rail carriers (UP, BN, CPKC, CN, NS and CSX), and each calculates an anticipated transit time and arrival date, the latter of which is supplied to the customer. Such plans for shuttle/unit train movements are a necessity for

¹ The Board has elected to not renew the “service consistency standard in part 1145” in the NPRM.

the railroads to manage their capacity and system use. The Board's OETA rules should measure how the railroad performs to the estimated transit time and estimated time of arrival ("ETA") for shuttle/unit trains.

In regards to the inclusion of shuttle/unit trains in Class 1 carrier reporting of ISP data, the NGFA concedes that such movements do not typically have a planned spot and/or pull time more associated with manifest traffic. However, an equivalent metric that is important for shuttle/unit train shippers is the period of time between releasing a loaded unit train for pickup by the carrier, and the time the carrier actually arrives to take the loaded train. The failure of a Class 1 railroad to arrive in a timely manner after a train is released according to the carrier's requirements can create significant inefficiencies and disruptions at loading facilities, as well as downstream problems for end users of the loaded commodities.

In summary, for the reasons expressed herein, the NGFA supports the inclusion of shuttle/unit train movement date within the collection of OETA and ISP data.

Respectfully submitted,

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