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BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. EP 787

UPDATING CLASS I RAIL CARRIER REPORTING REQUIREMENTS
Notice of Proposed Rulemaking

**COMMENTS OF THE
AMERICAN CHEMISTRY COUNCIL
November 24, 2025**

The American Chemistry Council is pleased to provide the following comments on the Surface Transportation Board's (STB) proposal to amend certain data reporting requirements for Class I rail carriers. ACC supports the Board's proposal to end supplemental reporting of Positive Train Control (PTC) expenditures and to require weekly reporting of two key rail service metrics. Together, these steps eliminate unnecessary regulatory burdens while increasing the utility of data reported to the Board.

ACC represents more than 190 of America's leading chemical companies. Our members produce a wide variety of chemicals, polymers, and related products that make our lives and our world healthier, safer, more productive, and more sustainable. The business of chemistry supports over 25% of the U.S. Gross Domestic Product and directly touches nearly all manufactured goods.

ACC member companies are some of the largest customers of the U.S. freight rail system. In 2024, railroads transported more than 2.2 million carloads of chemical and plastics products. Reliable and predictable rail service is vital to our U.S. manufacturing operations and the thousands of downstream customers that we supply.

PTC Reporting Requirements Are No Longer Warranted

ACC agrees with the Board's proposal to terminate the requirement for supplemental reporting of PTC expenditures. Currently, PTC expenditures are incorporated into R-1 reports under the category of "capital investments and expenses" as well as in a "PTC Supplement" that breaks out PTC expenses from broader categories. The PTC Supplement identifies PTC-related expenditures on road property and equipment improvements, depreciation of road property and equipment, accumulated depreciation, investment in

railway property, and railway operating expenses. It also identifies the total mileage on which carriers install PTC and the number of locomotives equipped with PTC.

As of December 2020, PTC has been fully implemented on all required freight and passenger railroad route miles and implementation costs have largely been paid. Therefore, the supplemental reporting of PTC-related expenses provides little ongoing value to the Board and other stakeholders.

ACC supports the Board's goal of eliminating unneeded data collection. Given the limited utility of the reporting PTC specific data, we agree that the reporting burdens associated with the PTC Supplement are no longer warranted. Therefore, the supplemental requirement should be rescinded, and PTC-related expenditures should continue to be reflected in the R-1 "capital investments and expenses" totals. ACC further supports the proposal for each railroad to file a final summary of major PTC-related expenditures, which will provide transparency and closure to this initiative.

ACC Supports the Proposed Service Metrics Reporting Requirement

ACC strongly supports the Board's proposal to require weekly Class I carrier reporting of two additional railroad service metrics: an original estimated time of arrival (OETA) metric and an industry spot and pull (ISP) metric. Weekly reporting of the OETA and ISP metrics will enhance existing railroad performance data reported under 49 CFR Part 1250, which include metrics such as average train speed and dwell time. While these existing metrics are useful for assessing network fluidity, they provide an incomplete and potentially misleading view of overall rail service. OETA and ISP metrics will provide critical additional data on how well railroads are delivering for their customers.

Late deliveries and missed local service are highly disruptive for rail customers. These issues are particularly concerning for rail customers that do not have access to competitive transportation options and therefore lack meaningful recourse through commercial markets. Greater visibility into Class I railroads' on-time delivery and local service performance will help rail customers anticipate and make operational adjustments to mitigate service issues.

OETA Metric

Under the Board's proposal, each Class I carrier would report the percentage of shipments in manifest service that were delivered to the designated destination no later than 24 hours after the OETA, out of all shipments on the carrier's system that moved in manifest service during that week.

ACC agrees with the Board's observation that late deliveries can cause supply chain disruptions, which can lead to rail shippers and their downstream customers to suspend operations. Chronic late deliveries may also force shippers to order additional shipments that would otherwise be unnecessary, and in some instances, encourage shippers to maintain unnecessarily large car fleets, adding to railroad congestion. OETA reporting would provide insight into the timeliness of deliveries of manifest traffic system wide. This would advance the Board's objective of ensuring rail service reliability and enable the Board to more quickly identify and respond to service issues.

However, ACC urges the Board to modify the OETA metric to address cars that arrive both *before and after* the OETA. Under the proposed rule, any arrivals before the OETA, including those more than 24 hours early, would be counted as on-time deliveries. ACC understands that in monitoring network-wide performance, the Board's intent is to focus on whether carriers are delivering shipments later than anticipated. However, unexpected early deliveries can also cause significant impacts for rail customers. They can congest a customer facility with railcars, creating operational disruptions that are comparable to those resulting from late deliveries.

In addition, focusing solely on late deliveries could incentivize carriers to artificially inflate OETA's in order to boost performance of this metric. Such gamesmanship would compromise the accuracy of the estimated delivery time and make it more difficult for rail customers to plan for car deliveries.

ISP Metric

The proposed ISP metric would measure a rail carrier's success in performing local placements ("spots") and pick-ups ("pulls") of loaded railcars and unloaded private or shipper leased railcars at shippers' or receivers' facilities during a planned service window. The ISP metric would measure the percentage of requested car placements or pick-ups that the carrier successfully completed by the applicable cut-off time.

ACC strongly supports weekly reporting of ISP performance both at the system level and at the operating division level. The ISP metric would provide critical visibility into railroads' first mile/last mile service performance that is not captured in existing metrics. As with OETA, this would advance the Board's objective of ensuring rail service reliability and enable the Board to more quickly identify and respond to service issues.

However, ACC is concerned that the value of the ISP metric could be compromised if railroads are permitted to unilaterally expand service windows to artificially bolster success rates for this metric. Therefore, STB should revise the definition of "planned

service windows” to ensure that they are jointly established and verified by both the railroad and the customer.

Conclusion

ACC appreciates the Board’s overall efforts to focus its data collection on critical elements while reducing unnecessary regulatory burdens. The proposed rule appropriately eliminates outdated requirements for supplemental reporting of PTC expenditures while providing valuable service data to the Board, rail customers, and other stakeholders.

Thank you for your consideration of these comments. For questions or additional information regarding this submission, please contact Jeff Sloan, Senior Director of Regulatory Affairs, at (202) 249 6710 or jeffrey_sloan@americanchemistry.com.