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THE HONORABLE PATRICK FUCHS
Chairman
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

THE HONORABLE MICHELLE SCHULTZ
Vice Chairman
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

THE HONORABLE KAREN HEDLUND
Member
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

Dear Hon. Chairman Fuchs, Hon. Vice Chairman Schultz, and Hon. Member Hedlund,

The U.S. Department of Agriculture (USDA) appreciates the Surface Transportation Board's (Board) September 30 notice of proposed rulemaking (NPRM) to discontinue Class I railroad reporting on Positive Train Control (PTC) and require Class I railroad reporting on two new service metrics. USDA strongly supports the Board's service metric proposal. The rulemaking would begin a minimal-burden collection long-sought by USDA and agricultural stakeholders. In this letter, USDA focuses its observations and recommendations on the latter half of the Board's proposal—to collect two new metrics from Class I railroads.

USDA regularly participates in STB proceedings on behalf of agricultural shippers and has long advocated for transparent, standardized rail service metrics. Data form a critical component of efficient and well-functioning markets. Shippers and railroads rely on data to make decisions on where, when, and in what amounts to allocate limited resources. Timely and reliable information on the nation's rail network leads to better outcomes for all parties by making profitable opportunities more apparent, making risk more manageable, and reducing costs. Especially when issued regularly, good data can act as an early warning system, easing rail service issues before they become major challenges and, in some cases, preventing rail service issues altogether. Data-sharing gives all stakeholders a common factual baseline for discussing service problems and making contingency plans. Data-sharing also promotes accountability: public performance metrics create an incentive for railroads to meet service expectations. Data from the best-performing railroads create a standard for others to strive for; data from under-performing railroads illuminates trouble spots. In sum, data-sharing leads to better outcomes for shippers and railroads, ultimately benefiting the wider public.

USDA welcomes the Board's proposal to collect an "original estimated time of arrival" (OETA) metric and an "industry spot and pull" (ISP) metric. OETA measures whether cars arrive when

the railroad first promised, and ISP measures the percentage of scheduled spots and pulls successfully performed within the planned service window. Both are important metrics, as they capture dimensions where railroad and shipper operations intersect. Agricultural demand is time sensitive and seasonal. Missed ETAs and missed local service windows can halt processing lines, disrupt export programs, and force shippers to carry excess private-car inventory to buffer uncertainty—costs ultimately borne by producers and consumers. Therefore, public metrics tracking the quality of service through OETA and ISP metrics are critical to efficient business operations.

USDA’s goal is to make the reported measures even more effective without materially increasing the burden on railroads. We offer the following refinements for the Board’s consideration:

- **Collect OETA (or Similar Metric) for Unit Trains.** Because unit/shuttle train shipments represent the majority of grain tonnage, it is crucial for the Board to measure their performance through OETA (or a similar metric). According to the Board’s 2023 public-use carload waybill sample, about three-quarters of corn and soybean shipments were 75 or more cars, and 45 percent of wheat shipments were 75 or more cars. Grain shuttle/unit train movements are critical to the competitiveness of U.S. grain exports, as well as domestic livestock production. As the Board observed in recent years, livestock production often relies on “just in time” deliveries, and delays in grain unit/shuttle train shipments can severely impact the Nation’s food system (Docket No. FD 36609, *Foster Poultry Farms – Ex Parte Petition for Emergency Service Order*).

USDA strongly encourages the Board to reconsider its previous decision to exclude unit trains from the OETA metric (Docket No. EP 711, *Reciprocal Switching for Inadequate Service*). The Board’s decision to exclude unit trains stems from inconsistencies between railroads in how they produce trip plans. However, the railroads do give shippers estimated times of arrival for their unit trains. (See, for instance, the National Grain and Feed Association’s opening comments.) Even if a separate OETA metric for unit trains must be considered, the Board should not exclude such an important traffic segment. Nor should the segment be excluded for the way its measurement differs from that of manifest shipments and differs between railroads.

- **Disaggregate OETA by geography and/or commodity.** The system-level OETA is a valuable proposal, but USDA encourages the Board to collect OETA at a more granular level—such as the operating division level. Service issues unique to a corridor or to a commodity can get washed out in system level averages. The railroads should be able to easily disaggregate at the operating division level, keeping the additional burden minimal.
- **Include too-early-arrival incidence in OETA or track it separately.** The proposal rightly documented “late deliveries can, among other things, lead to supply chain disruptions, which can, in some instances, cause shippers to suspend operations” (NPRM, p. 5). Cars that are delivered too early are also problematic, as a shipper likely has not staged resources early enough and must now make costly adjustments. Indeed, Trinidad Benham and the American Chemistry Council (ACC) made similar points in their opening comments. ACC explained, “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*” (p. 3, emphasis added). Deviations above *and below* represent differences from plans and expectations; they both impose costs. The Board should include cars “more than 24 hours early” as part of the OETA metric or separate the OETA metric into two, a too-early measure and a too-late measure.

As originally proposed, the Board estimated 156 burden hours annually on Class I railroads to provide the OETA and ISP metrics—about *one-tenth* of the 1,400 hours the Board would free railroads from if the PTC reporting is dropped. While the above modifications would add some to the burden, it is worth emphasizing they should be one-time costs. The difference between one-time fixed and common costs of collecting certain metrics compared to their marginal costs of ongoing submission is an important distinction. The largest costs in reporting data to the Board come from establishing the source systems and/or data pipelines necessary to compute a particular metric. The railroads have said they are already producing much of this data and no commenters objected to the Board’s collecting these data in some form. With those pipelines in place, the processes for a railroad to compute metrics—such as the proposed OETA and ISP—should be straightforward (low cost).

Several commenters asked for additional metrics, such as measures of variation (instead of just averages) and measures of cancelations and early arrivals (instead of just late shipments). USDA encourages the Board to collect and publish these additional metrics, too. Not only would the additional metrics provide crucial context on the size and quality of service across the network, but also the data can be provided at very little additional cost.

In closing, USDA believes the proposal, with some minor modifications, will enable the Board—with minimal burden on railroads—to achieve multiple worthy goals, including monitoring service trends; providing real-time, publicly available data to all stakeholders to improve planning and business decisions; and furthering the transportation goals of 49 U.S.C. 10101. As the Board notes, these valuable data are not available elsewhere (NPRM, p. 18). USDA also appreciates the Board’s broad efforts and commitment to improve data visualization and reporting, assess the usefulness of its metrics, and automate data processing (NPRM, p. 5).

Thank you for the opportunity to comment.

Sincerely,



Dudley W. Hoskins
Under Secretary
Marketing and Regulatory Programs