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310878

February 17, 2026

Via E-Filing

Ms. Cynthia T. Brown
Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street SW
Washington, DC 20423

ENTERED
Office of Chief Counsel
February 17, 2026
Part of
Public Record

Re: EP 290 (Sub-No. 5) (2026-1),
Quarterly Rail Cost Adjustment Factor

Dear Ms. Brown,

The Western Coal Traffic League (“WCTL”) writes to reply briefly to the Association of American Railroads (“AAR”) letter dated February 12, 2025, regarding the RCAF forecast for the first quarter of 2026. To the extent necessary, WCTL submits that good cause exists for accepting this reply in the interests of completeness.

WCTL and AAR agree that the AAR’s choice of data has no impact on the 1Q26 RCAF forecast stated on a 4Q22 = 100 basis. Nonetheless, WCTL disagrees with the AAR’s position that the unavailability of historical data at the time due to the unfortunate government shutdown provides a sound basis to deviate from the established practice.

The missing historical data will be available to calculate the actual 4Q25 RCAF values for the forecast error correction for the 2Q26 RCAF forecast. Likewise, to calculate the actual 1Q26 RCAF values for the forecast error correction for the 3Q26 RCAF forecast, it will be appropriate to utilize actual 1Q26 data, January 2026-March 2026, and not December 2025-February 2026 data. Actual and forecast values should logically be reconciled using the identical interval. While the forecasted 1Q26 forecast values were the same using either interval on a 4Q22 = 100 basis, the same may not hold for the actual 1Q26 values.

In addition, the fortunate rounding for the 1Q26 RCAF forecast may not hold for the 1Q26 AII-LF forecast, which the AAR bases on the RCAF.

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Please let us know if there are questions concerning this submission.

Respectfully submitted,

A handwritten signature in black ink, reading "Robert D. Rosenberg". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert D. Rosenberg
Counsel for the Western Coal Traffic League

cc: Rand Gayad, Association of American Railroads
J. Frederick Miller, Jr., Esq., Association of American Railroads
Timothy D. Crowley, L.E. Peabody & Associates, Inc.
Daniel L. Fapp, L.E. Peabody & Associates, Inc.