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BEFORE THE
SURFACE TRANSPORTATION BOARD

DOCKET NO. FD 36873

UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY
- CONTROL -
NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN RAILWAY COMPANY

**COMMENTS OF THE RAIL PASSENGERS' ASSOCIATION
AND RESPONSE IN SUPPORT OF THE JOINT SHIPPER ASSOCIATIONS' MOTION
FOR SUMMARY DENIAL**

The Rail Passengers Association (“Rail Passengers” or “RPA”) submits these comments on the passenger-rail portions of the Amended Railroad Control Application filed April 30, 2026, as supplemented July 7 and July 27, 2026 (collectively, the “Application”). RPA also supports the Joint Shipper Associations’ August 6, 2026, Motion for Summary Denial.

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PRELIMINARY STATEMENT

This proposed combination would place an extraordinary share of the Nation’s present and planned passenger-rail network under the control of a single Class I carrier. RPA’s route-level review identifies more than two dozen existing Amtrak services that use UP or NS infrastructure. Applicants’ own plans project additional freight traffic on dozens of passenger-service and route-segment pairings, commonly adding two to ten freight trains per day. At the same time, 43 of the 69 projects selected for the Federal Railroad Administration’s Corridor Identification and Development Program potentially use UP or NS infrastructure. Twenty-two of those 43 projects overlap at least one segment on which Applicants project additional freight traffic.¹

Applicants nevertheless frame their passenger obligation principally as the ability to “maintain current passenger service levels” and fulfill existing performance agreements. That standard is too narrow, and the evidence offered to satisfy even that minimal standard is insufficient. Current passenger service on both Applicants’ territories already experiences substantial host-responsible delay. Statutory preference and operating agreements allocate existing capacity, but they do not add physical capacity, nor, in practice, have they guaranteed acceptable access. Applicants have supplied no timetable-based model or passenger-specific dispatching plan showing how their new freight trains will coexist with existing passenger schedules. Their statistical analysis asks whether historical variation in utilization on one selected segment predicts delay across an entire passenger service, then treats statistically inconclusive results as affirmative proof of no harm. It does not carry the evidentiary burden applicable to the first major-merger proposal reviewed under the Board’s 2001 Merger Rules.²

¹ RPA Ex. 2; RPA Ex. 3; RPA Workpaper 1, tabs “RPA_2_AMTK Rtes” and “RPA_3_CID Rtes.” The project count treats each of FRA’s 69 selected Corridor ID projects once. Segment-level rows do not sum as unique trains because one freight train may traverse multiple listed segments, and one segment may be used by multiple passenger services.

² Applicants’ Final Supplemental Response (UP-80/NS-78), SUPP. PAGES 159–60, 164–81 (filed July 27, 2026) (“July 27 Supplemental Response”).

RPA concurs with the Joint Shipper Associations’ Motion for Summary Denial. That motion demonstrates that a major-merger application must contain sufficient facts for the Board rationally to apply each public-interest criterion in 49 U.S.C. § 11324(b), and that the 2001 Merger Rules impose a heavier, evidence-based burden on Applicants. After the April 30 Amended Application and two supplemental submissions, the record still does not meet that threshold. The Board should summarily deny the Application under 49 C.F.R. § 1180.4(c)(8). Independently of the freight-competition deficiencies identified by the Joint Shipper Associations, Applicants’ passenger-rail presentation omits the transparent, transaction-specific evidence needed to find that existing passenger service will be protected or that reasonably foreseeable passenger development will remain viable.³ Applicants’ August 26 response to the pending *prima facie* challenges does not address—much less cure—the independent passenger deficiencies presented here.

If the Board does not summarily deny the Application, the passenger record warrants denial on the merits. At the absolute minimum, any approval must include enforceable capacity commitments, passenger-performance standards, public reporting, objective intervention triggers, and remedies that protect both existing service and reasonably foreseeable passenger development.

STATEMENT OF INTEREST

RPA is the Nation’s largest nonprofit organization representing the interests of current and future rail passengers. With 127,000 members nationwide, it advocates for the preservation, improvement, and expansion of intercity and commuter passenger rail, transit, and public-transportation connections. Its members use services hosted by UP and NS, and its policy and research work includes host-railroad performance, corridor development, capacity planning, and the federal passenger-rail programs implicated by this transaction. RPA therefore has a direct

³ Joint Shipper Associations’ Motion for Summary Denial (ACC-6/ACD-6/AFPM-6/NITL-3/TFI-6) 13–19, 47–58 (filed Aug. 6, 2026) (“Joint Shipper Motion”).

interest in whether the merger preserves adequate and reliable passenger transportation and leaves the national rail network capable of supporting the passenger investments Congress, FRA, states, and regional authorities are advancing.

SUMMARY OF ARGUMENT

I. The governing public-interest inquiry is broader than Applicants’ proposed benchmark of maintaining existing service and agreements. Section 1180.10(b) establishes required content for coordinating current passenger operations; it does not displace the need to examine the “effect of the proposed transaction on the adequacy of transportation to the public” in 49 U.S.C. § 11324(b)(1), nor the statutory definition of “transportation” as including “the movement of passengers” in 49 U.S.C. § 10102(9), nor the rail transportation policy or the Board’s duties under 49 C.F.R. §§ 1180.1, 1180.7, and 1180.8. Those authorities require the Board to evaluate the adequacy of passenger transportation, preserve essential passenger and commuter services, examine anticipated delay from increased traffic, and consider whether the network can continue to support essential services and national growth.

II. Applicants have not demonstrated that existing passenger service will be protected. The status quo is already inadequate. RPA’s analysis of Applicants’ route-level projections shows 42 of 53 quantified Amtrak passenger-service and route-segment pairings receiving additional freight traffic; Applicants label capacity “sufficient” for 31 of those affected pairings without an operating demonstration. Applicants rely on preference, contracts, confidential capacity inputs, internal management procedures, and historical monthly averages. Those items do not show when the new freight trains will run, where they will meet or pass passenger trains, whether yards and terminals can receive the traffic, or what enforceable action follows when performance deteriorates.

III. Dr. Kristof Zetenyi's analysis does not cure the operational gap. He relied on Applicants' inputs without independent verification and paired each passenger service's total host-responsible delay with utilization on a single selected segment. Several service-specific comparisons have no or very few historical observations at the projected post-merger utilization. His pooled regression coefficients remain positive but are estimated too imprecisely to distinguish from zero. That result is inconclusive. It does not establish that the true effect is zero, validate Applicants' capacity model, or show how post-merger trains will operate.

IV. Applicants have not evaluated reasonably foreseeable passenger development. FRA selected 69 Corridor ID projects under a program Congress created and funded to develop a national pipeline of new and improved intercity services. RPA's project-level analysis shows that 43, or 62.3 percent, potentially use UP or NS infrastructure. Applicants' preservation-of-the-status-quo analysis excludes those services, additional frequencies on existing routes, and other planned development. A merger of this scale cannot be evaluated on the fiction that the passenger timetable will remain frozen for decades.

ARGUMENT

I. THE BOARD'S PUBLIC-INTEREST INQUIRY MUST ENCOMPASS ADEQUATE EXISTING SERVICE AND REASONABLY FORESEEABLE PASSENGER DEVELOPMENT

A. The 2001 Merger Rules require a transaction-specific passenger showing.

A major-merger applicant must present a *prima facie* case. The Application must disclose facts sufficient, when construed favorably to Applicants, to support *every* finding needed for a public-interest determination; summary denial is required if the disclosed facts instead affirmatively show that the proposal is inconsistent with the public interest. 49 C.F.R. §

1180.4(c)(8). The Board adopted that threshold to avoid unnecessary and wasteful proceedings where an application does not enable the agency to exercise its statutory duties and rationally apply the criteria in 49 U.S.C. § 11324(b).⁴

The 2001 Merger Rules deliberately made the burden heavier. The Board recognized that the excess capacity that had once supported consolidation had largely disappeared, that integration failures in a further Class I combination could create nationwide disruptions, and that projected benefits might be difficult to obtain or harms difficult to remedy. It therefore adopted a skeptical “show me” approach and required well-documented, reasonable evidence rather than optimistic projections. That skepticism holds special force where Applicants propose to add substantial freight traffic to lines and terminals carrying scheduled passenger trains.⁵

The rules impose passenger-specific duties. A major-transaction operating plan must “detail any impacts anticipated” on commuter and other passenger services, including delay that may result when a line is scheduled to handle increased traffic. 49 C.F.R. § 1180.8(b)(2). A Service Assurance Plan must identify precise steps to ensure attainable service, describe potential degradation and mitigation, and explain definitively how Applicants will continue to facilitate Amtrak and commuter operations. 49 C.F.R. §§ 1180.1(h), 1180.10(a)–(b). The plan must also address yard and terminal fluidity, infrastructure impediments, future growth, contingencies, benchmarks, and a timetable for major changes. *Id.* § 1180.10(c)–(k).

The Board specifically found Applicants’ original showing insufficient because it failed to explain “how passenger trains will actually be affected.” Decision No. 21 invited a dispatching plan for post-merger traffic, train-modeling evidence, and analysis of anticipated freight schedules

⁴ 49 C.F.R. § 1180.4(c)(8); *Railroad Consolidation Procedures*, 363 I.C.C. 767, 768–70 (1980); *Union Pac. R.R.—Control—Chicago & N.W. Holdings Corp.*, 9 I.C.C.2d 939, 950 (1993).

⁵ *Major Rail Consolidation Procedures*, 5 S.T.B. 539, 545–46, 549, 558–60 (2001); 49 C.F.R. § 1180.1(c).

and their effect on passenger service. Applicants responded with general processes and historical associations. They still have not shown how the trains will actually operate together.⁶

B. The Service Assurance Plan provision is not the outer boundary of the statutory inquiry.

Applicants rely heavily on 49 C.F.R. § 1180.10(b), which speaks to fulfilling existing performance agreements and establishing operating protocols. That provision is a required component of the Application. It does not, however, confine the Board’s public-interest responsibility to today’s routes, frequencies, and agreements.⁷

Congress requires the Board to consider “the effect of the proposed transaction on the adequacy of transportation to the public.” 49 U.S.C. § 11324(b)(1). Congress defines “transportation” to include the movement and handling of passengers. *Id.* § 10102(9). The governing rail transportation policy calls for a sound rail transportation system that meets the needs of the public and promotes safe and efficient service. *Id.* § 10101. The Board’s own policy requires preservation of essential passenger and commuter services wherever feasible and focuses on the ability of the Nation’s transportation infrastructure to continue supporting those services. 49 C.F.R. § 1180.1(c)(2)(ii). The Board further states that mergers should strengthen, rather than undermine, the rail network’s ability to advance national growth and competitiveness. *Id.*

The rule’s required full-system impact analysis confirms the breadth of the required inquiry. Applicants must demonstrate the transaction’s adverse and beneficial effects on essential freight, passenger, and commuter service on the applicants’ lines and across other network links. 49 C.F.R. § 1180.7(b). Their analysis must state its assumptions, demonstrate the validity of its methodology, and provide supporting data. *Id.* § 1180.7(a), (b)(7). A mere narrow assurance that current agreements will remain in place does not satisfy those duties.

⁶ *Union Pac. Corp.—Control—Norfolk S. Corp.* (Decision No. 21), FD 36873, slip op. at 31–32 (STB served May 28, 2026) (“Decision No. 21”); July 27 Supplemental Response, SUPP. PAGE 164.

⁷ July 27 Supplemental Response, SUPP. PAGES 165–70, 178–79.

The proposed transaction therefore presents two related passenger inquiries. First, Applicants must demonstrate that the merger will preserve adequate and reliable existing service. Second, the Board must consider whether the transaction would impair the rail network’s ability to accommodate reasonably foreseeable passenger development. The record fails both tests.

C. The passenger deficiencies independently fail the *prima facie* threshold.

The Joint Shipper Associations correctly explain that an application can fail the *prima facie* requirement in two ways: by omitting facts necessary for the required findings, or by presenting facts that affirmatively demonstrate public-interest harm. The passenger presentation does both.⁸

Applicants read Decision No. 30 too broadly. The Board observed that many pending submissions “focus on merits-related issues,” but expressly stated that its decision reflected no view on any matter raised in those motions and comments and that it would address them separately. The Board therefore has not converted every claimed evidentiary omission into a merits dispute or determined that Applicants have presented the facts necessary to apply each statutory criterion.⁹

Applicants’ August 26 response does not cure the passenger-specific *prima facie* deficiency. Applicants characterize the pending challenges as disputes over the weight of evidence already supplied and therefore as matters for the merits. RPA’s objection is different. Applicants failed to supply the passenger-specific operating evidence necessary for the Board rationally to apply 49 U.S.C. § 11324(b)(1) and the passenger requirements of 49 C.F.R. §§ 1180.8(b)(2) and 1180.10(b). Although their Response claims that the Transaction satisfies “every element of the relevant statutes and regulations,” it does not mention passenger service, Amtrak, commuter rail,

⁸ Joint Shipper Motion 13–16; 49 C.F.R. § 1180.4(c)(8)(i)–(ii).

⁹ *Union Pac. Corp.—Control—Norfolk S. Corp.* (Decision No. 30), FD 36873 et al., slip op. at 4 (STB served Aug. 18, 2026) (“Decision No. 30”).

§ 1180.10(b), or the Board’s passenger-specific supplementation questions. The Response therefore leaves RPA’s independent passenger challenge unanswered.¹⁰

Applicants omit a timetable-based operating model, a passenger-specific dispatching plan, transparent capacity workpapers available for meaningful public testing, and any serious assessment of the federally selected passenger projects that could depend on the combined carrier. Their own evidence reveals near-capacity segments, many passenger routes receiving additional freight traffic, reliance on third-party investments, and an existing passenger-performance baseline that regularly misses Amtrak’s target. The Board cannot rationally find that the proposed transaction will preserve adequate passenger transportation on that record.

The Application also creates an unavoidable evidentiary dilemma. If the traffic growth projected to support Applicants’ public-benefit claims is credible, Applicants must demonstrate how the resulting freight trains will be scheduled and dispatched without harming passenger operations. If the projections are exaggerated, then the claimed public benefits that depend on that traffic are overstated. Applicants cannot claim billions of dollars in benefits from new traffic while treating the trains that produce those benefits as operationally inconsequential.¹¹

II. APPLICANTS HAVE NOT DEMONSTRATED THAT EXISTING PASSENGER SERVICE WILL BE PROTECTED

A. ‘Maintaining current service’ preserves an already inadequate baseline.

Applicants’ promise begins from a demonstrably inadequate baseline. Amtrak’s July 2026 Host Railroad Report cites the target of fewer than 900 host-responsible delay minutes per 10,000 train-miles. In July, NS produced 1,136 such minutes and UP produced 1,173; both exceeded the

¹⁰ *Applicants’ Response Regarding Their Prima Facie Case* (UP-94/NS-93) 1–3, 9–14, 38 (filed Aug. 26, 2026) (“Applicants’ Prima Facie Response”); *id.* at 2 (asserting that the proposed transaction “meets every element of the relevant statutes and regulations”).

¹¹ *See* Joint Shipper Motion 48–53 (challenging Applicants’ traffic-diversion and public-benefit estimates); July 27 Supplemental Response, SUPP. PAGES 182–85 (relying on projected diversions and traffic to support public-interest claims).

regulatory target. UP's rolling twelve-month result also exceeded the target at 1,044 minutes, while NS's was 896. Across the six major host railroads, host railroads were responsible for 65.8 percent of all delay minutes during the twelve-month reporting period, compared with 22.7 percent attributed to Amtrak and 11.6 percent to third parties.¹²

The route-level results show the practical risk. On UP, the *Sunset Limited* recorded 1,357 host-responsible delay minutes per 10,000 train-miles in July and 1,167 over the preceding twelve months. Freight-train interference, at 876 minutes, was its largest July delay category. On NS, the *Blue Water*, *Floridian*, *Lake Shore Limited*, *Pere Marquette*, and *Wolverine* exceeded the 900-minute target both in July and across the preceding twelve months. Freight-train interference was the largest July delay category for each service. Freight-train interference alone on the *Blue Water*, as just one example, reached 1,526 delay minutes per 10,000 train miles, and overall NS-responsible delay minutes on that route in July came to 2,587 per 10,000 train miles. Those services are among the routes on which Applicants project additional traffic in the Chicago-Porter corridor and elsewhere.¹³

Applicants thus ask the Board to infer no adverse passenger effect from evidence that the post-merger railroad may perform no worse than UP and NS perform today. The governing question is adequacy, not mere statistical continuity. A failure to demonstrate measurable worsening does not establish acceptable service, compliance with passenger preference in dispatching, or protection against the merger's added operating risk.

B. RPA's route-level analysis exposes the weakness of Applicants' capacity assurances.

RPA reviewed Applicants' passenger-impact tables route by route and segment by segment. Exhibit RPA-2 and RPA Workpaper 1 examine 55 Amtrak passenger-service and route-

¹² RPA Ex. 4, Amtrak, *Host Railroad Report* 2, 8 (July 2026) ("July Host Railroad Report"). Percentages do not sum to 100.0 due to rounding.

¹³ RPA Ex. 4, July Host Railroad Report 4, 6, 11.

segment pairings covering 26 listed services. After excluding two pairings for which Applicants' traffic change is not quantified, 42 of 53 quantified pairings receive additional freight traffic, generally two to ten trains per day. Applicants nevertheless label existing capacity "sufficient" for 31 of those 42 affected pairings. Eleven affected pairings require investment. Six depend on investments attributed to the Virginia Passenger Rail Authority, North Carolina Department of Transportation, or Pennsylvania Department of Transportation; only two identify Applicants as the source of the needed improvements; and three do not identify the funding source.¹⁴

Representative examples show why a label cannot substitute for an operating demonstration:

1. Chicago-Porter: five additional freight trains, affecting multiple Amtrak services, labeled "sufficient."
2. Porter-Toledo and Toledo-Cleveland: seven additional freight trains on each pairing, labeled "sufficient."
3. New Orleans Back Belt: eight additional freight trains on a terminal corridor used by every New Orleans Amtrak service, labeled "sufficient."
4. Meridian-Atlanta: ten additional freight trains, with Applicant-funded improvements identified.
5. Pittsburgh-Harrisburg: seven additional freight trains, with capacity investment attributed to PennDOT.
6. Multiple *Sunset Limited* segments: two to eight additional freight trains, with a mixture of sufficient-capacity conclusions and either identified or unspecified investments.¹⁵

¹⁴ RPA Ex. 2; RPA Workpaper 1, tab "Existing Service." The exhibit omits unsourced route-segment delay calculations contained in an earlier internal version of the analysis and uses RPA Ex. 5, Amtrak's June Host Railroad Report, separately for baseline performance.

¹⁵ RPA Ex. 2; RPA Workpaper 1, tab "Existing Service."

The Pittsburgh-Harrisburg example is particularly revealing. Pennsylvania and NS agreed that more than \$200 million in infrastructure and safety improvements were needed to support one additional daily *Pennsylvanian* round trip. The Application now projects seven additional daily freight trains on the same passenger corridor and relies on the PennDOT investment in its capacity presentation. *Rail Passengers* is not suggesting that one passenger round trip and seven freight trains impose identical operating demands; however, the asymmetry does require an explanation based on actual schedules, train characteristics, meets, passes, and terminal constraints. Applicants supply none.¹⁶

The RPA tables do not purport to prove that every additional freight train will delay a passenger train. But they do show why Applicants' burden cannot be satisfied by repeatedly writing "sufficient" next to increases of this size. The same traffic projections support Applicants' claimed merger benefits. Their operating consequences must receive equally rigorous treatment.

C. Preference and operating agreements allocate capacity; they do not create it.

Applicants contend that their capacity analysis "implicitly" accounts for passenger trains because Amtrak possesses statutory preference and passenger carriers have operating agreements with UP and NS. That reasoning avoids the capacity question. Preference and contracts determine how capacity should be allocated when passenger and freight trains compete. They do not add a siding, crossover, receiving track, terminal slot, crew, or dispatching window.¹⁷

Nor does the existence of those obligations demonstrate that Applicants will fulfill them after adding the Growth Plan traffic. The July Host Railroad Report shows that statutory and contractual duties currently coexist with substantial host-responsible delay. The Board asked how passenger trains will actually be affected. Reciting the obligations which already govern UP and

¹⁶ Pennsylvania Department of Transportation, *Shapiro Administration Finalizes Agreement to Expand Passenger Rail Service in Western Pennsylvania* (Sept. 22, 2023) (stating that the Commonwealth will invest more than \$200 million to support a second daily *Pennsylvanian* round trip); Amended Application, Vol. 2, at 771–72.

¹⁷ July 27 Supplemental Response, SUPP. PAGES 165–66, 178–79 (citing 49 U.S.C. § 24308 and existing passenger agreements).

NS does not demonstrate sufficient physical and operational capacity to perform them, especially in light of the real-world performance problems that prompted separate enforcement proceedings involving these Applicants before this Board¹⁸ and the U.S. District Court for the District of Columbia.¹⁹

D. Applicants' internal change-management process is not the dispatching plan the Board requested.

Applicants state that they cannot realistically design schedules for anticipated new freight trains before the merger is authorized. They instead describe UP's internal process: planners consider network assets and passenger operations, internal stakeholders approve changes, weekly meetings monitor implementation, and UP/NS can revert to a pre-merger train plan if problems arise.²⁰

That may be a sensible management procedure. It is not a passenger-specific operating plan. It identifies no expected freight operating windows, directional flows, train length or mix, meets and passes, yard-receiving constraints, peak-period conflicts, objective intervention triggers, or enforceable corrective measures. Moreover, a commitment to consider passenger operations internally also leaves the Board and affected passenger operators without a testable record.

The mismatch is especially sharp because Applicants quantify the new trains and rely on those quantities to claim both sufficient capacity and substantial public benefits. They cannot use projected trains to establish the value and feasibility of the merger while disclaiming even a representative schedule showing how those trains fit alongside passenger timetables. A promise

¹⁸ Complaint & Petition of the Nat'l R.R. Passenger Corp. Under 49 U.S.C. § 24308(f)—for Substandard Performance of Amtrak's Sunset Limited Trains 1 & 2, NOR 42175, slip op. at 1 (STB served Aug. 6, 2025) (noting Amtrak's settlement with Union Pacific Railroad Company and granting Amtrak's motion to dismiss its complaint with prejudice and terminate the Board's investigation). *See also* Surface Transportation Board, *STB Grants Amtrak Request to Dismiss Sunset Limited On-Time Performance Proceeding Following Settlement*, No. 25-30 (Aug. 6, 2025) (noting that the Board's investigation developed a record addressing more than 1,000 individual delay events).

¹⁹ *United States v. Norfolk Southern Corp.*, No. 1:24-cv-02226-ABJ, Compl. ¶¶ 25–33 (D.D.C. filed July 30, 2024); *see also* U.S. Dep't of Justice, *Norfolk Southern Agrees to Give Amtrak Trains Highest Priority Over Freight Trains and Make its Delay Records for Amtrak Trains Available to the Department of Justice* (Sept. 9, 2025) (announcing settlement with Norfolk Southern Corporation and Norfolk Southern Railway Company and the United States' motion to dismiss the action pursuant to that settlement).

²⁰ July 27 Supplemental Response, SUPP. PAGES 167–69.

that an internal committee may reverse a train-plan change after service deteriorates does not show that deterioration will be avoided. Indeed, history strongly suggests otherwise.

Applicants' dispatching, monitoring, and communication provisions are similarly general. Dispatcher training, legacy passenger teams, recurring meetings, and a future unified point of contact may help administer existing duties. They supply no enforceable passenger benchmarks, reporting rules, trigger points, or remedies. They also cannot govern dispatching by third parties such as Conrail. The provisions therefore do not fill the operating-evidence gap identified in Decision No. 21.²¹

E. Historical monthly averages cannot substitute for operational modeling.

Applicants expressly declined to perform Rail Traffic Controller or comparable dispatch modeling, stating that an RTC analysis for 25 passenger services would require many months. They substituted historical comparisons of monthly utilization and passenger performance.²²

Those comparisons answer a narrower retrospective question. The fact that a line segment carried an equal or greater monthly average number of trains at some point in the past does not reproduce the post-merger train plan. Monthly utilization obscures time of day, direction, length, speed, train mix, maintenance windows, crew and locomotive availability, meets and passes, junction conflicts, and whether yards and terminals can receive the traffic. Those factors determine whether the added freight trains will conflict with scheduled passenger movements.

The Board's 2001 rules demand route-level operational evidence because integration risk cannot be resolved through aggregate assurances. Where the Applicants' public-benefit case rests on a three-year Growth Plan, the time required to model representative high-risk passenger

²¹ July 27 Supplemental Response, SUPP. PAGES 169–70.

²² July 27 Supplemental Response, SUPP. PAGE 170 n.317.

corridors is part of the burden of proposing the merger, not a reason to decide the case without the evidence.

F. The Zetenyi analysis is too narrow and inconclusive to establish no passenger harm.

1. The analysis accepts Applicants' essential inputs without verification.

Dr. Zetenyi expressly states that he relied on data supplied by Applicants and did not independently verify segment selection, capacity calculations, train volumes, or Operating Plan projections. His analysis tests the relationship within Applicants' chosen inputs. It does not validate the capacity model, determine whether Applicants selected the right segments, or establish that the projected post-merger traffic is operationally correct.²³

2. One selected segment cannot represent an entire passenger service or network.

For each passenger service, Applicants selected the growth-affected segment with the highest projected utilization and paired that segment's monthly utilization with the service's monthly host-responsible delay. A passenger train can incur host-caused delay at a terminal, yard, junction, or another line segment far from the selected segment; delay then propagates through the trip and into connections, equipment turns, and later departures. A relationship between route-level delay and utilization on one selected segment cannot demonstrate that the rest of the passenger route or operating network is protected.²⁴

Dr. Zetenyi acknowledges that infrastructure, topography, train density, traffic composition, weather, maintenance, operating practice, and other conditions may affect both utilization and passenger delay. He also states that the detailed information needed to control those factors directly was unavailable. Service fixed effects and common month and year effects address

²³ Verified Statement of Kristof Zetenyi, Ph.D. ¶¶ 7–10, July 27 Supplemental Response, SUPP. PAGES 372–75 (“Zetenyi V.S.”).

²⁴ Zetenyi V.S. ¶¶ 7, 9, 16, SUPP. PAGES 372–74, 377–78.

some persistent or common variation. They do not capture time-varying, route-specific operating conditions central to the merger's actual train plan.²⁵

3. Several service-specific comparisons have little, no, or irrelevant experience at the projected level.

Nine of the 25 Relevant Passenger Services have no historical month at or above the projected post-merger utilization level. For services that could be compared, the *Capitol Corridor* and *Pennsylvanian* each have one qualifying month, the Richmond/Newport News/Norfolk service has two, and the *Texas Eagle* has four. Moreover, one third of all qualifying months are on the *Missouri River Runner*, where Applicants' Operating Plan would decrease their utilization of the line, a situation which is not an appropriate comparison for the rest of the network. Dr. Zetenyi appropriately cautions that he does not rely on those service-specific comparisons alone, while also cautioning against over-interpreting data where an omitted-variables problem may mask a statistically significant relationship ("Accordingly, a reliable analysis should distinguish the true relationship between passenger service performance and [capacity utilization] from the effects of these other factors that may influence passenger delay.")²⁶ Applicants nevertheless present the results as confirmation that projected freight growth can be absorbed without affecting passenger service.²⁷

In samples this thin and selective, a finding that a difference is not statistically significant is not affirmative evidence that the operational effect is zero. It can also reflect low statistical power, a failure to assess confounding variables, or even measuring inapplicable conditions.

²⁵ *Id.* ¶¶ 16–18, SUPP. PAGES 377–79.

²⁶ *Id.* ¶ 17, SUPP. PAGES 378–79.

²⁷ *Id.* ¶¶ 31–34 & Fig. 4 n.4, SUPP. PAGES 390–94. The services with no historical month at or above projected utilization are the *California Zephyr*, *Cardinal*, *Carolinian*, Christiansburg service, *Crescent*, *Mardi Gras*, *Piedmont*, Roanoke service, and VRE.

4. The pooled coefficients are positive and imprecise, not proof of no effect.

The raw data show a positive correlation of 0.278 between utilization and passenger delay. After accounting for common month and year patterns, the reported correlation increases to 0.339. In the pooled fixed-effects models, both principal utilization coefficients remain positive: 2.317 additional host-responsible delay minutes per 10,000 train-miles for each percentage-point increase in utilization in the linear model, and approximately 0.371 percent additional delay in the log model. Both models use 1,186 observations.^{28 29}

Neither coefficient is estimated precisely enough to distinguish it from zero at conventional significance levels. That is a legitimate statistical finding. It means the analysis fails to detect the estimated positive relationship reliably under the selected data and specification. It does not, however, prove that the true effect equals zero. Applicants repeatedly convert an inconclusive result into affirmative evidence of no passenger harm. The inference does not follow.

5. The *Sunset Limited* illustrates both the baseline and inference errors.

Applicants feature the *Sunset Limited* as an example. They report projected utilization of 94.2 percent on the Wellton-Picacho segment. Across 88 historical months, mean host-responsible delay was 1,633 minutes; in the 19 months at or above the projected utilization, the mean was 1,452 minutes. That simple comparison does not show that added merger traffic will improve or preserve the service. Wellton-Picacho is one portion of a nearly 2,000-mile route, while the delay measure covers UP's host portion of the service. After seasonal adjustment, Dr. Zetenyi's estimated difference is positive, though imprecise.^{30 31}

²⁸ *Id.* ¶¶ 35–37 & Fig. 6, SUPP. PAGES 395–97. The linear specification reports a coefficient of 2.317 with a standard error of 5.913; the log specification reports 0.371 with a standard error of 0.463.

²⁹ *Id.* ¶¶ 26–29 & Figs. 1–2, SUPP. PAGES 385–88.

³⁰ Zetenyi V.S. ¶ 32, Fig. 4 & Ex. 1, SUPP. PAGES 390–92, 401. The seasonally adjusted point estimate is positive, and the confidence interval includes zero.

³¹ July 27 Supplemental Response, Table PR-1, SUPP. PAGES 173–75.

Even the limited proposition that delay might not become measurably worse fails to answer the public-interest question. The July Host Railroad Report records 1,357 UP host-responsible delay minutes per 10,000 train-miles for the *Sunset Limited* and 1,167 over twelve months, both above Amtrak’s 900-minute target. Preserving that treatment is not adequate performance.³²

The capacity premise also depends on a project. Applicants state that the segment’s present fluid capacity is 35 trains per day and project Growth Plan traffic of 35.8 trains by Year 3. Their 38-train threshold assumes completion of the Mohawk-Stoval double-track project by the end of Year 2, subject to timely environmental review. They separately identify a 4.9-mile Wellton-Noah double-track connection that would raise capacity to 45 trains “when an increase becomes necessary,” without a definite passenger-protective trigger. The Board should not treat 38 trains per day as present capacity or accept a calculated margin of 2.2 trains without an enforceable completion deadline, contingency plan, reporting, intervention trigger, and remedy. “No worse than bad” cannot satisfy the public-interest standard.³³

G. Applicants’ near-capacity and third-party-dependent examples reinforce the need for enforceable proof.

1. New Orleans-Oliver Junction.

Applicants project 20.0 trains per day against a fluid-capacity threshold of 20.1 between New Orleans and Oliver Junction, a 99.7 percent utilization and a calculated margin of one-tenth of a train per day. The selected historical comparison contains no month at or above that projected level for either the *Crescent* or the *Mardi Gras*.³⁴

Applicants respond that the most constrained single-track portion is not traversed by Amtrak and that crossover projects at St. John, Terminal Junction, and Elysian Fields will improve

³² July Host Railroad Report 12.

³³ July 27 Supplemental Response, SUPP. PAGES 95–97, 179–80.

³⁴ *Id.*, Table PR-1, SUPP. PAGE 174; Zetenyi V.S. ¶ 31 n.23, SUPP. PAGE 390.

the Back Belt. Those facts call for a segment-specific operating demonstration. If the single-track bottleneck does not govern Amtrak's movement, Applicants should show the actual capacity, conflicts, and timetable on the track Amtrak uses. If the crossovers cure the constraint, their scope, completion dates, capacity effects, and passenger protections should be enforceable. The public filing provides no timetable-based demonstration of how eight additional freight movements, passenger trains, and terminal operations will interact.³⁵

2. Conrail Lehigh Line.

Applicants calculate fluid capacity of 116 trains per day on the Conrail Lehigh Line and conclude that four to five additional freight trains can be added while preserving the current Raritan Valley Line schedule. The supporting capacity workpaper is highly confidential. The public response does not identify the operating times of the additional trains, peak-period conflicts, junction and terminal effects, or how Conrail's dispatching will be governed. It examines approximately six shared miles and protects only today's 52-weekday and 36-weekend passenger schedule. Because UP/NS neither owns nor dispatches the line, its internal change-management process cannot guarantee Conrail's performance. The 116-train headline is not the transparent passenger operating analysis the Board requested.³⁶

3. Reliance on independent public investments.

RPA's workpaper identifies six affected pairings where Applicants' capacity conclusion depends on projects attributed to VPRA, NCDOT, or PennDOT. Those state and federally supported investments are neither created by the merger nor guaranteed by Applicants. Under the 2001 rules, benefits that can be achieved independently of the merger cannot be credited as merger-generated public benefits. Nor may Applicants treat public passenger investments as free freight

³⁵ July 27 Supplemental Response, SUPP. PAGES 180–81.

³⁶ *Id.*, SUPP. PAGES 161–64; Workpaper "Conrail Lehigh Line - Highly Confidential.xlsx."

capacity without committing to provide equivalent capacity if a third-party project is delayed, modified, or canceled.³⁷

H. Terminal and network effects remain largely unexamined.

Chicago illustrates the inadequacy of isolated segment assurances. Applicants project five additional daily freight trains on the Chicago-Porter corridor used by five Amtrak services. On Metra's UP-West corridor, Applicants project two additional trains between Chicago and Kedzie, fourteen between Kedzie and Proviso, and five between Proviso and Elburn, while separately assuring the Board that Metra operates over UP's high-capacity Chicago-area lines. Applicants also identify an additional movement in the NS Southwest/Markham area. These changes reach multiple Amtrak services and Metra lines and converge in a terminal where delay propagates across carriers and missed connections. Applicants provide no terminal-wide passenger simulation or reconciled post-merger plan showing how these movements will coexist with peak-period commuter and intercity schedules.³⁸

Applicants also claim a reduction in "rubber tire interchanges" i.e. drayage trucking of freight shipments between UP & NS yards in the Chicago area, and that this will reduce congestion overall.^{39 40} It is important not to conflate transportation modes, however: while a decrease in drayage trucking could potentially decrease road traffic congestion, it explicitly requires moving those trucks onto new trains shuttling between yards. Applicants note that this shift will add two daily trains to a "small portion of UP's Geneva Subdivision,"⁴¹ but do not clarify if those trains are included in the total of 5-14 additional freight trains on the Geneva Subdivision described elsewhere.⁴² Here Applicants also claim "that recently improved triple-track segment has provided

³⁷ 49 C.F.R. §§ 1180.1(c), 1180.6(b)(11); *Major Rail Consolidation Procedures*, 5 S.T.B. at 559; Joint Shipper Motion 47–48.

³⁸ RPA Ex. 2; RPA Workpaper 1, tab "Existing Service"; Amended Application, Vol. 2, at 709, 764, 769–70, 772, 775–77.

³⁹ Amended Application, Vol. 2, at 695–96, *Gehring/Orr V.S.* ¶ 188.

⁴⁰ *Id.* at 710, *Gehring/Orr V.S.* ¶ 206.

⁴¹ *Id.* at 710, *Gehring/Orr V.S.* ¶ 204.

⁴² *Id.* at 776–77, *Gehring/Orr V.S.* ¶ 351.

a minimum of 25 trains per day of slack capacity,” a clear, precise, and quantitative statement about a line’s capacity that is entirely omitted from Applicants’ claims in Chapter 8, “Impacts on Passenger Operations.”

Applicants also failed to comprehensively note all planned changes affecting Chicago-area services in the Passenger Rail Impacts section. In addition to the above-noted two daily trains on the Geneva Subdivision, Applicants also claim that interchange operations with CN in Markham, IL will add one daily freight train to the NS SouthWest Sub⁴³, while elsewhere claiming they will not add any trains affecting Amtrak’s *Cardinal*⁴⁴ or Metra SouthWest Service.⁴⁵

New Orleans presents the same network problem in a different form. Every Amtrak service using New Orleans traverses some portion of the Back Belt, where Applicants project eight additional freight trains. The 99.7 percent selected-segment utilization, crossover projects, interchange changes, and passenger schedules must be evaluated together. Applicants instead divide the problem among a line-capacity calculation, general terminal assurances, and a historical regression incapable of modeling the proposed movements.

The freight Service Assurance Plan adds another layer of passenger risk. The Joint Shipper Associations show that Applicants’ freight remedy excludes much contract and exempt traffic and repeats prior merger assurances that transitional disruption will be avoided. RPA does not contend that the freight claims program creates passenger rights. We identify, however, the passenger consequence: a weak freight service-assurance regime leaves a larger risk of network congestion and spillover delay. Internal reviews and reversibility promises fail to contain that systemwide risk.⁴⁶

⁴³ *Id.* at 710, Gehringer/Orr V.S. ¶ 204.

⁴⁴ *Id.* at 765, Gehringer/Orr V.S. ¶ 324.

⁴⁵ *Id.* at 779, Gehringer/Orr V.S. ¶ 360.

⁴⁶ Joint Shipper Motion 53–56; 49 C.F.R. §§ 1180.1(h)(5), 1180.10(i).

III. APPLICANTS FAILED TO EVALUATE REASONABLY FORESEEABLE PASSENGER DEVELOPMENT

A. The Corridor ID portfolio is a concrete federal development pipeline.

Congress created the Corridor Identification and Development Program to facilitate the development of intercity passenger rail corridors. 49 U.S.C. § 25101. FRA selected 69 corridors in December 2023 across 44 states and awarded more than \$34 million in initial development funding. The selected portfolio includes restored routes, new corridors, additional daily frequencies, and improvements to existing services. This is not speculative interest untethered from public action or political support. It is a congressionally authorized and funded development pipeline.⁴⁷

Applicants' supplemental passenger analysis tests none of it. Every part of their showing is organized around current routes, current frequencies, current schedules, existing agreements, and segments selected from today's operating footprint. Even a complete demonstration that the Growth Plan could coexist with today's timetable would not establish that the combined carrier can accommodate passenger development already moving through federal and state planning.

B. Nearly two-thirds of the selected projects potentially depend on the combined carrier.

RPA reviewed the 69 distinct Corridor ID projects and their potential overlap with UP and NS infrastructure. Forty-three projects, or 62.3 percent, potentially use infrastructure of one Applicant and could therefore require cooperation from the combined carrier. Twenty-two of those 43 overlap at least one segment where Applicants project added freight traffic. Exhibit RPA-3 and

⁴⁷ 49 U.S.C. § 25101; Federal Railroad Administration, *FY22 Corridor Identification and Development Program Project Summaries* (Dec. 2023); Federal Railroad Administration, *Corridor Identification and Development Program* (last updated Dec. 18, 2025).

the “Corridor ID” tab of RPA Workpaper 1 identify the projects, relevant segments, projected train-count changes, and potential infrastructure owner.⁴⁸

That concentration dramatically changes the public-interest stakes. By combining two freight networks, the merger could give one single private entity a decisive role in a majority of the Nation’s federally selected passenger-development portfolio. Applicants offer no full-system analysis of how their Growth Plan, terminal changes, capital plan, and dispatching practices would affect that portfolio and, by extension, clearly expressed congressional intent in creating that portfolio.

C. Applicants’ present-service benchmark cannot answer the future-capacity question.

Applicants may argue that schedules and alignments for Corridor ID projects remain under development. Precision is not the same as foreseeability. The Board need not predict a final timetable for every selected corridor to require Applicants to identify likely overlaps, preserve reasonable capacity, explain which Growth Plan projects consume that capacity, and establish a process for accommodating additional frequencies and new services. Applicants themselves project three years of freight growth and longer-term capacity needs under uncertain future conditions. They cannot then demand certainty only when the foreseeable development is passenger service.

The Board’s policy reinforces the prospective inquiry. Mergers should strengthen the rail network’s ability to sustain essential services and advance national growth. 49 C.F.R. § 1180.1(c)(2)(ii). The Service Assurance Plan must address infrastructure improvements related to future growth and their relationship to service delivery. *Id.* § 1180.10(d). The statutory inquiry

⁴⁸ RPA Ex. 3; RPA Workpaper 1, tab “Corridor ID.” Potential ownership reflects the alignments identified in the workpaper and may be refined as project sponsors complete service-development planning.

asks whether transportation to the public will remain adequate, not whether the merged carrier can freeze the present timetable in place.

D. Public passenger investments cannot be converted into merger benefits or excuses.

Applicants repeatedly rely on improvements funded or advanced by states, Amtrak, and federal programs. Those projects may create capacity and public benefits, but the merger did not cause them. The Board's rules require Applicants to distinguish benefits obtainable only through the merger from benefits achievable by other means. 49 C.F.R. § 1180.6(b)(11).⁴⁹

The same discipline must apply to passenger infrastructure. An independent public project cannot offset merger harm as a merger-generated benefit. Nor should it become a reason to allow Applicants' freight Growth Plan to consume capacity intended to support the public passenger investment. If Applicants' adequacy finding depends on a third-party project, any approval should require the combined carrier to protect the passenger capacity and provide equivalent capacity if the project does not materialize as assumed.

**IV. IF THE BOARD DOES NOT DENY THE APPLICATION, IT SHOULD IMPOSE
SPECIFIC AND ENFORCEABLE PASSENGER CONDITIONS**

The Board has broad authority to condition a Class I consolidation to mitigate or offset public-interest harm. 49 U.S.C. § 11324(c); 49 C.F.R. § 1180.1(d). General promises to comply with existing law, communicate with passenger operators, and revisit problems after deterioration are inadequate here. Any approval should, at minimum, require the following:

1. **Preservation of Existing Passenger-Service Rights and Remedies.** As a condition of approval, the Board should require that consummation of the transaction not extinguish, impair, supersede, or otherwise diminish any existing passenger-service right, remedy,

⁴⁹ 49 C.F.R. §§ 1180.1(c), 1180.6(b)(11); *Major Rail Consolidation Procedures*, 5 S.T.B. at 559; Joint Shipper Motion 47–48.

settlement obligation, contractual commitment, or other protection applicable to either Applicant. Those protections should remain enforceable against the appropriate successor entity according to their terms, subject to subsequent modification by the parties or lawful action by an agency or court with jurisdiction. This condition would preserve, rather than expand, existing rights and remedies.

2. **Transparent good-faith modeling consistent with statutory intent.** Any freight-passenger interaction analysis used to support any action or decision executing the transaction or future route decisions made as a result of the transaction must include a modeling approach based on the “unreasonable impairment” standard in 49 U.S.C. § 24308(e), rather than “zero impact.”
3. **Passenger operating demonstrations.** Before implementing each material merger-related train-plan change on a passenger-used corridor, UP/NS must provide a route- and terminal-specific operating analysis showing anticipated freight windows, passenger conflicts, meets and passes, yard and terminal capacity, maintenance windows, and contingency operations.
4. **Existing-service performance floors.** UP/NS must meet enforceable route-level standards for host-responsible delay and endpoint on-time performance, with no route permitted to use an already deficient pre-merger result as its compliance floor.
5. **Public reporting.** UP/NS must publish monthly route- and host-segment passenger-performance reports, merger-related train-count changes, capacity utilization, infrastructure status, and identified passenger conflicts in a consistent format suitable for comparison with pre-merger benchmarks.
6. **Objective intervention triggers.** The conditions must define delay, utilization, terminal-dwell, missed-connection, and project-schedule thresholds that automatically require corrective action, rather than leaving intervention to internal discretion.

7. **Expedited passenger dispute resolution.** Amtrak, commuter authorities, states, and corridor sponsors must have access to an expedited Board-supervised procedure for disputes over dispatching, access, performance, capacity studies, and infrastructure requirements.
8. **Capacity investment commitments.** UP/NS must fund all infrastructure required to prevent merger-related degradation of passenger service. If Applicants rely on a third-party project to support their Growth Plan, they must provide equivalent capacity if that project is delayed, altered, or canceled.
9. **Project-specific commitments.** Mohawk-Stoval, the New Orleans Back Belt crossovers, and any other project used to establish post-merger fluid capacity must have enforceable completion dates, transparent milestones, contingency measures, and passenger-protective remedies.
10. **Corridor ID capacity preservation.** UP/NS must identify and preserve reasonable capacity for Corridor ID projects and additional frequencies that reach defined development milestones and must participate promptly and in good faith in planning and operating studies.
11. **Independent validation.** Capacity models, material assumptions, and post-merger passenger-impact analyses must be available to affected passenger operators and qualified reviewers under appropriate protective arrangements, with independent validation where the Board relies on them. All parties must have access to any modeling, data inputs, results, scenarios, and assumptions, subject to those parties executing appropriate undertakings to safeguard confidential material. This would permit all parties to participate equally in the modeling and resulting analysis and would ensure good-faith public-interest principles are maintained.

- 12. Continuing oversight and supplemental relief.** Passenger conditions should remain subject to the Board's minimum five-year oversight, with authority to extend oversight, modify conditions, require capital work, or impose operational remedies if expected passenger protections do not materialize.

CONCLUSION

RPA supports the Joint Shipper Associations' Motion for Summary Denial. The passenger record supplies an additional and independent reason that the Application fails to present a *prima facie* case. Applicants have not produced the transparent, transaction-specific evidence required to determine how existing passenger trains will be affected, whether the combined railroad can provide adequate passenger transportation, or whether reasonably foreseeable passenger development will remain viable.

The Board should summarily deny the Application under 49 C.F.R. § 1180.4(c)(8). If it proceeds to the merits, it should deny the Application because Applicants have not carried the heightened public-interest burden imposed by 49 U.S.C. § 11324 and the 2001 Merger Rules. At the absolute minimum, the Board should impose the enforceable passenger conditions described above and any additional relief necessary to protect existing service, future development, and the public investment already committed to the Nation's passenger-rail network.

Respectfully submitted,

/s/ Jim Mathews

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 Dated: Sept. 9, 2026

VERIFICATION

I, Jim Mathews, declare under penalty of perjury that I am President and Chief Executive Officer of the Rail Passengers Association; that I am authorized to submit this filing on its behalf; that I have read the foregoing; and that, to the best of my knowledge, information, and belief, the factual statements made on behalf of the Association are true and correct. The analyses identified as RPA Workpaper 1 were prepared from the sources identified therein under the supervision of RPA's research and policy staff.

Executed on: September 9, 2026

/s/ Jim Mathews

Jim Mathews

CERTIFICATE OF SERVICE

I certify that on September 9, 2026, the foregoing document and its public exhibits and workpaper were served by email on all parties of record in this proceeding, the Secretary of Transportation, the Attorney General of the United States, and Administrative Law Judge Jenifer Soulikias, consistent with 49 C.F.R. § 1104.12 and the Board's service directives in this docket.

/s/ Jim Mathews

Jim Mathews

LIST OF EXHIBITS AND WORKPAPER

Exhibit RPA-2: Applicants' Projected Freight-Traffic Changes on Segments Used by Existing Passenger Services

Exhibit RPA-3: Corridor ID Projects Potentially Dependent on UP or NS Infrastructure

Exhibit RPA-4: Amtrak, Host Railroad Report, July 2026

Exhibit RPA-5: Amtrak, Host Railroad Report, June 2026

RPA Workpaper 1: UP-NS Passenger Route and Corridor ID Analysis (native Microsoft Excel format)

Applicants' Projected Freight-Traffic Changes on Segments Used by Existing Passenger Services

Route	Segment	Daily Trains Delta (Operating Plan)	Daily Trains Delta (Growth Plan)	Net Change	UP&NS Capacity Claim	Capacity Investments Supported By	Reference	Nbr Delayed Passengers	Pct Delayed Passengers	Avg Delay Mins	Deviation from Amtrak Avg	(Delay Data from FY2025)
Blue Water	Chicago - Porter, IN	4	1	5	'Sufficient'		p. 764	27501	30.5	44.8	-32.4	
California Zephyr	Sacramento - Auburn, CA	2	0	2	'Sufficient'		p. 757	10225	34.8	96.2	45.1	
	Auburn - Alazon, NV	3	1	4	'Sufficient'			24126	46.6	98.9	49.2	
	Alazon, NV - Denver, CO	0	0	0	'Sufficient'			63415	52.1	99.3	49.8	
Capitol Corridor	Sacramento - Auburn, CA	2	0	2	'Sufficient'		p. 757-758	34305	10.2	38.9	-41.3	
Cardinal	Dolton - South Holland, IL	2	0	2	'Sufficient'		p. 764-765	8658	41.7	72.9	10.0	
	Manassas - Orange, VA	2	1	3	Investments	VPRA		6585	52.4	60.8	-8.3	
Carolinian	Charlotte - Cary, NC	2	1	3	Investments	NCDOT	p. 766	80028	44.2	46.5	-29.9	
Cascades	Portland, OR - Seattle, WA	2	0	2	'Sufficient'		p. 758-759	218313	23.1	39.3	-40.7	
City of New Orleans	Back Belt Line, LA	8	0	8	'Sufficient'		p. 715-716	8163	18.6	96.5	45.6	
Coast Starlight	Portland, OR - Seattle, WA	2	0	2	'Sufficient'		p. 759	53377	43.6	71.9	8.4	
	Los Angeles Terminal Area	0	3	3	'Sufficient'		p. 406	9625	23.3	167.6	152.8	
Crescent	Back Belt Line, LA	8	0	8	'Sufficient'		p. 715-716	7581	23.9	77	16.1	
	New Orleans, LA - Meridian, MS	3	0	3	'Sufficient'		p. 767-768	5664	44.3	58.4	-11.9	
	Meridian, MS - Atlanta, GA	8	2	10	Investments	Applicants		15059	20.4	69.3	4.5	
	Atlanta, GA - Lynchburg, VA	2	2	4	'Sufficient'			15625	27.7	68.4	3.2	
	Lynchburg - Manassas, VA	2	2	4	Investments	VPRA		9290	45.6	51	-23.1	
Floridian	Chicago - Porter, IN	4	1	5	'Sufficient'		p. 769	32806	64	143.8	116.9	
	Porter, IN - Toledo, OH	4	3	7	'Sufficient'			9051	63.1	107	61.4	
	Toledo - Cleveland, OH	6	1	7	'Sufficient'			15639	71.7	113.9	71.8	
	Cleveland - Pittsburgh, PA	0	0	0	'Sufficient'			12960	57.5	116.3	75.4	
	Selma - Cary, NC	0	0	0	'Sufficient'			26938	77.9	102.5	54.6	
Gold Runner	Sacramento - Stockton, CA	2	0	2	'Sufficient'		p. 759-760	22152	32.7	38.7	-41.6	
Heartland Flyer	Dallas/Ft. Worth Terminal Area				'Sufficient'			15407	42	39.8	-40.0	
Lake Shore Ltd	Chicago - Porter, IN	4	1	5	'Sufficient'		p. 769-770	20577	26	63	-5.0	
	Porter, IN - Toledo, OH	4	3	7	'Sufficient'			6108	35.2	62.6	-5.6	
	Toledo - Cleveland, OH	6	1	7	'Sufficient'			12914	28.8	72.4	9.2	
Lincoln Service	Wann - Joliet, IL	-1	1	0	'Sufficient'		p. 760	67264	54.3	50.7	-23.5	
	St. Louis Terminal Area	-1	1	0	'Sufficient'		p. 712-713	25109	44.9	50.8	-23.4	
Mardi Gras Service	Back Belt Line, LA	8	0	8	'Sufficient'		p. 770-771	1077	12.8	23	-65.3	
Missouri River Runner	St. Louis - Rock Creek, MO	-1	3	2	'Sufficient'		p. 760-761	31923	55.4	48.5	-26.8	
	St. Louis Terminal Area	-1	1	0	'Sufficient'		p. 712-713	25109	44.9	50.8	-23.4	
Pacific Surfliner	San Luis Obispo - Las Posas, CA	0	0	0	'Sufficient'		p. 761	56102	15.8	46.9	-29.3	
	Los Angeles Terminal Area	0	3	3	'Sufficient'		p. 406	68663	14.7	47	-29.1	
Pennsylvanian	Pittsburgh - Harrisburg, PA	6	1	7	Investments	PennDOT	p. 771-772	35054	31.7	44	-33.6	
Pere Marquette	Chicago - Porter, IN	4	1	5	'Sufficient'		p. 772	5906	10.5	47.6	-28.2	
Piedmont	Charlotte - Raleigh, NC	2	1	3	Investments	NCDOT	p. 772-773	94094	23.2	37.8	-43.0	
Norfolk Services	Norfolk - Petersburg, VA	1	1	2	'Sufficient'		p. 773	56206	43.5	52.4	-21.0	
Roanoke Services	Manassas - Lynchburg, VA	1	1	2	Investments	VPRA	p. 774	43508	31.7	50.7	-23.5	
	Lynchburg - Roanoke, VA	2	2	4	'Sufficient'			20286	39.1	61.3	-7.5	
Sunset Limited	City of Industry - Pomona, CA	2	0	2	Investments	Unspecified	p. 762-763	6837	31.6	124.6	87.9	
	Pomona - West Colton, CA	4	0	4	Investments	Unspecified		1218	54.1	104.3	57.3	
	West Colton, CA - El Paso, TX	6	0	6	Investments	Applicants		15981	48.8	87.2	31.5	
	El Paso - Sierra Blanca, TX	2	0	2	'Sufficient'			3482	48.8	98.8	49.0	
	Sierra Blanca - San Antonio, TX	0	0	0	'Sufficient'			1531	47.1	90.8	37.0	
	San Antonio - Houston, TX	2	0	2	'Sufficient'			6342	29.9	93.1	40.4	
	Houston - Beaumont, TX	6	0	6	Investments	Unspecified		1052	64.7	59.6	-10.1	
	Back Belt Line, LA	8	0	8	'Sufficient'		p. 715-716	2372	21.7	105.5	59.1	
Texas Eagle	Dallas/Ft. Worth Terminal Area				'Sufficient'			17010	53.4	90.1	35.9	
	Dallas - Marshall, TX	1	2	3	'Sufficient'		p. 763	33451	61.6	91.3	37.7	
	Bald Knob - Little Rock, AR	3	0	3	'Sufficient'			8468	57.9	96.7	45.9	
	St. Louis Terminal Area	-1	1	0	'Sufficient'		p. 712-713	24393	52.8	102.1	54.0	
	Wann - Joliet, IL	-1	1	0	'Sufficient'			25979	18.3	87.3	31.7	
Winter Park Ski Train	Denver - Winter Park, CO	0	0	0	'Sufficient'		p. 763					
Wolverine	Chicago - Porter, IN	4	1	5	'Sufficient'		p. 775	54672	27.5	54.2	-18.3	
TOTAL:		138	44	182								
Altamont Corridor Express	Stockton - Sacramento, CA	2	0	2	'Sufficient'		p. 775-776					
CalTrain	Gilroy - San Jose, CA	0	0	0	'Sufficient'		p. 776					
Metra	Chicago - Harvard, IL	0	0	0	'Sufficient'							
	Chicago - Kedsie, IL	2	0	2	'Sufficient'		p. 709					
	Kedsie - Proviso, IL	14	0	14	'Sufficient'		p. 776-777					
	Proviso - Elburn, IL	5	0	5	'Sufficient'		p. 776-777					
	Landers - Manhattan, IL	0	0	0	'Sufficient'		p. 779					
	Markham, IL	1	0	1	'Sufficient'		p. 709					
MetroLink	Soto St Jct. - Pomona, CA	2	0	2	'Sufficient'		p. 777-778					
	Pomona - W. Riverside, CA	0	0	0	'Sufficient'							
	Moorpark - North Montalvo, CA	0	0	0	'Sufficient'							
	Los Angeles Terminal Area	0	3	3	'Sufficient'		p. 406					
Trinity Railway Express	Dallas - Ft Worth, TX	0	0	0	'Sufficient'		p. 778					
Rocky Mountaineer	Denver, CO - Moab, UT	0	0	0	'Sufficient'		p. 778-779					
Virginia Railway Express	Broad Run - Manassas, VA	0	0	0	'Sufficient'		p. 779-780					
	Total:	26	3	29								

Corridor ID Projects Potentially Dependent on UP or NS Infrastructure

Route	Segment	Daily Trains Delta (Operating Plan)	Daily Trains Delta (Growth Plan)	Net Change	Track Owner(s)	
Adirondack Corridor	New York, NY - Montreal, QC	0	0	0	Neither	n/a
Amtrak Cascades Corridor	Vancouver, BC - Eugene, OR	2	0	2	Union Pacific	
Amtrak Texas High-Speed Rail Corridor	Dallas, TX - Houston, TX	0	0	0	Neither	
Amtrak to Long Island	Washington, DC - Ronkonkoma, NY	0	0	0	Neither	n/a
Anchorage North & South Corridor	Fairbanks, AK - Seward, AK	0	0	0	Neither	
Asheville to Salisbury, North Carolina, Corridor	Asheville, NC - Salisbury, NC	0	0	0	Norfolk Southern	n/a
Atlanta to Savannah Corridor	Atlanta, GA - Savannah, GA	0	0	0	Norfolk Southern	n/a
Atlanta-Chattanooga-Nashville-Memphis Corridor	Atlanta, GA - Memphis, TN	0	0	0	Neither	n/a
Baton Rouge-New Orleans Corridor	Baton Rouge, LA - New Orleans, LA	0	0	0	Union Pacific	
Big Sky North Coast Corridor	Chicago, IL - Seattle, WA / Portland, OR	2	0	2	Union Pacific	
Boston and Albany Corridor	Boston, MA - Albany, NY	0	0	0	Neither	n/a
Brightline West High-Speed Corridor	Rancho Cucamonga, CA - Las Vegas, NV	0	0	0	Union Pacific	
California High-Speed Rail Phase 1 Corridor	San Francisco, CA - Los Angeles/Anaheim, CA	0	0	0	Neither	
Capitol Corridor	San Jose, CA - Reno/Sparks, NV	2	0	2	Union Pacific	
Cascadia High-Speed Ground Transportation	Vancouver, BC - Portland, OR	2	0	2	Union Pacific	
Central Coast Corridor	San Jose, CA - San Luis Obispo, CA	0	0	0	Union Pacific	
Charlotte to Kings Mountain, North Carolina, Corridor	Charlotte, NC - Kings Mountain, NC	0	0	0	Norfolk Southern	CLT, GAS
Charlotte, North Carolina, to Atlanta, Georgia, Corridor	Charlotte, NC - Greenville, SC	2	2	4	Norfolk Southern	GRV, SPB, GAS, CLT
Charlotte, North Carolina, to Atlanta, Georgia, Corridor	Greenville, SC - Gainsville, GA	0	0	0	Norfolk Southern	GNS, GRV
Charlotte, North Carolina, to Atlanta, Georgia, Corridor	Gainsville, GA - Atlanta, GA	2	2	4	Norfolk Southern	ATL, GNS
Charlotte, North Carolina, to Washington, D.C., Corridor	Charlotte, NC - Raleigh, NC	2	1	3	Norfolk Southern	CLT, KAN, SAL, LEX, HPT, GRO, BNC, DNC, CYN, NSF, RGH
Charlotte, North Carolina, to Washington, D.C., Corridor	Raleigh, NC - Washington, DC	0	0	0	Norfolk Southern	NSF, RGH, SSM, WLN, RMT, PTB, RVR, ASD, FBG, QAN, WDB, ALX, LOR, WAS
Chicago to Carbondale Corridor	Chicago, IL - Carbondale, IL	0	0	0	Union Pacific	
Chicago to Grand Rapids Corridor	Chicago, IL - Porter, IN	4	1	5	Norfolk Southern	CHI
	Porter, IN - Grand Rapids, MI	0	0	0	Neither	
Chicago to Port Huron Corridor	Chicago, IL - Porter, IN	4	1	5	Norfolk Southern	CHI
	Porter, IN - Port Huron, MI	0	0	0	Neither	
Chicago to Quad Cities Service Extension Program	Chicago, IL - Moline, IL	0	0	0	Union Pacific	
Chicago to St. Louis Higher-Speed Rail Corridor	Chicago, IL - St. Louis, MO	-1	1	0	Union Pacific	
Chicago, Fort Wayne, Columbus, and Pittsburgh	Chicago, IL - Pittsburgh, PA	0	0	0	Norfolk Southern	
Cleveland-Columbus-Dayton-Cincinnati (3C&D) Corridor	Cleveland, OH - Cincinnati, OH	0	0	0	Norfolk Southern	
Cleveland-Toledo-Detroit Corridor	Toledo, OH - Cleveland, OH	6	1	7	Norfolk Southern	
Coachella Valley Rail Corridor	Los Angeles, CA - Coachella, CA	4	0	4	Union Pacific	
Colorado Front Range Corridor	Fort Collins, CO - Pueblo, CO	0	0	0	Union Pacific	
Commonwealth Corridor	Lynchburg, VA - Christiansburg, VA	2	2	4	Norfolk Southern	LYH, RNK
	Charlottesville, VA - Lynchburg, VA	1	1	2	Norfolk Southern	LYH, CVS
Daily Cardinal Service	Newport News, VA - Charlottesville, VA	0	0	0	Norfolk Southern	CVS, ASD, RVR, RVM, WBG, NPN
Daily Sunset Limited Service	New York, NY - Chicago, IL	2	1	3	Norfolk Southern	
Diamond State Line	Los Angeles, CA - New Orleans, LA	6	0	6	Union Pacific	
Downeaster Corridor	Newark/Wilmington, DE - Salisbury/Berlin, MD	0	0	0	Norfolk Southern	n/a
Eau Claire-Twin Cities Corridor	Boston, MA - Rockland, ME	0	0	0	Neither	n/a
Empire Corridor	St. Paul, MN - Eau Claire, WI	0	0	0	Union Pacific	
Fayetteville to Raleigh, North Carolina, Corridor	New York, NY - Niagara Falls, NY	0	0	0	Neither	NFL, BFX, BUF
Fort Worth to Houston High-Speed Rail Corridor	Fayetteville, NC - Raleigh, NC	0	0	0	Neither	RGH, FAY
Green Mountain Corridor	Fort Worth, TX - Houston, TX	0	0	0	Neither	
Gulf Coast Passenger Rail Service	New York, NY - Burlington, VT	0	0	0	Neither	SDY, SAR, FED, WHL, FTC, POH, WSP, PLB
Hannibal Extension of Existing Chicago-Quincy Corridor	New Orleans, LA - Mobile, AL	8	0	8	Norfolk Southern	
Hartford Line Corridor	Chicago, IL - Hannibal, MO	0	0	0	Neither	
Heartland Flyer Extension	New Haven, CT - Springfield, MA	0	0	0	Neither	n/a
High Desert Intercity High-Speed Rail Corridor	Fort Worth, TX - Newton, KS	0	0	0	Neither	
Houston to San Antonio Corridor	Victor Valley, CA - Palmdale, CA	0	0	0	Neither	
I-20 Corridor Intercity Passenger Rail Service	Houston, TX - San Antonio, TX	2	0	2	Union Pacific	
Indianapolis-Chicago Corridor	Dallas, TX - Meridian, MS	1	2	3	Norfolk Southern	
Jacksonville-Orlando-Miami Corridor	Indianapolis, IN - Chicago, IL	2	0	2	Norfolk Southern	
Kansas City, MO, to St Joseph, MO	Jacksonville, FL - Miami, FL	0	0	0	Neither	MIA, HOL, FTL, DFB, DLB, WPB, OKE, SBG, WTH, KIS, ORL, WPK, SFA, DLD, PAK, IAX,
Keystone Corridor: Pittsburgh to Philadelphia	Kansas City, MO - St. Joseph, MO	0	0	0	Neither	
Keystone Corridor: Pittsburgh to Philadelphia	Pittsburgh, PA - Harrisburg, PA	6	1	7	Norfolk Southern	PGH, GNB, LAB, JST, ALT, TYR, HGD, LEW, HAR
Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Corridor	Harrisburg, PA - Philadelphia, PA	0	0	0	Norfolk Southern	HAR, MID, ELT, MJV, LNC, PAR, COT, DOW, EXT, PAO, ARD, PHL
Louisville-Indianapolis Passenger Rail Corridor	San Luis Obispo, CA - San Ysidro, CA	0	3	3	Union Pacific	
Miami-Orlando-Tampa Corridor	Louisville, KY - Indianapolis, IN	0	0	0	Neither	
Milwaukee to Chicago Hiawatha Service Expansion	Miami, FL - Tampa, FL	0	0	0	Neither	MIA, HOL, FTL, DFB, DLB, WPB, OKE, SBG, WTH, KIS, ORL, LKL, TPA
Milwaukee to Green Bay (Hiawatha Service Extension)	Milwaukee, WI - Chicago, IL	0	0	0	Union Pacific	
Milwaukee-Madison-Eau Claire-Twin Cities Corridor	Chicago, IL - Green Bay, WI	0	0	0	Union Pacific	
Northern Lights Express	Milwaukee, WI - Minneapolis, MN	0	0	0	Union Pacific	
Peoria to Chicago Passenger Rail Service	Minneapolis, MN - Duluth, MN	0	0	0	Neither	
Phoenix-Tucson Corridor	Peoria, IL - Chicago, IL	0	0	0	Neither	
Reading-Philadelphia-New York Corridor	Phoenix, AZ - Tucson, AZ	0	0	0	Union Pacific	
San Joaquin Valley Corridor	Reading, PA - New York, NY	0	0	0	Norfolk Southern	PHL, PHN, CWH, TRE, PJC, NBK, MET, EWR, NWK
Scranton to New York Penn Station Corridor	Sacramento/Oakland, CA - Redding, CA	2	0	2	Union Pacific	
TCMC Service Expansion via La Crosse	Scranton, PA - New York, NY	0	0	0	Neither	N/A
Texas Triangle: Dallas-Fort Worth-Houston Intercity Passenger Rail Corridor	Chicago, IL - Minneapolis, MN	0	0	0	Union Pacific	
Vermont Corridor	Fort Worth, TX - Houston, TX	0	0	0	Union Pacific	
Washington, D.C., to Bristol, VA, Corridor	Washington, DC - Montreal, QC	0	0	0	Neither	WAS, NCR, BWI, BAL, ABE, NRK, WIL, PHL, PHN, CWH, TRE, PJC, NBK, MET, EWR, NWK
Wilmington to Raleigh, North Carolina, Corridor	Roanoke, VA - Bristol, VA	2	0	2	Norfolk Southern	
Winston-Salem to Raleigh, North Carolina, Corridor	Wilmington, NC - Selma, NC	0	0	0	Neither	
Wolverine Corridor	Winston-Salem, NC - Greensboro, NC	0	0	0	Neither	
	Chicago, IL - Windsor, ON	4	1	5	Norfolk Southern	
Total:		69	20	89		
NS total:		48	16	64	26	0.337662338
UP total:		21	4	25	23	0.298701299
Other total:		0	0	0		0.636363636



Host Railroad Report

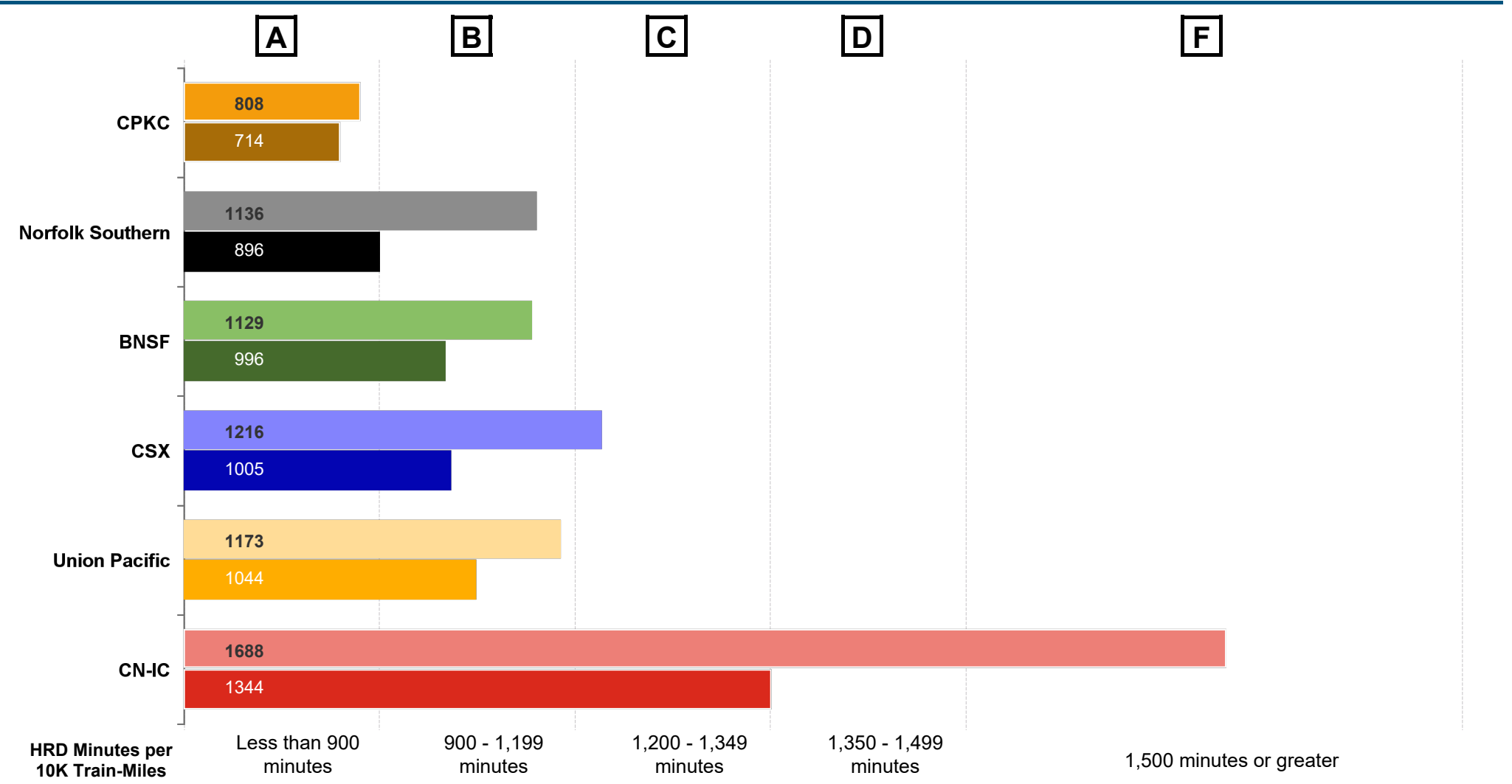
Amtrak Train Performance on Host Railroads

Data through July 2026

Host Railroad Report Card Update

Current Month and 1 Year Snapshot

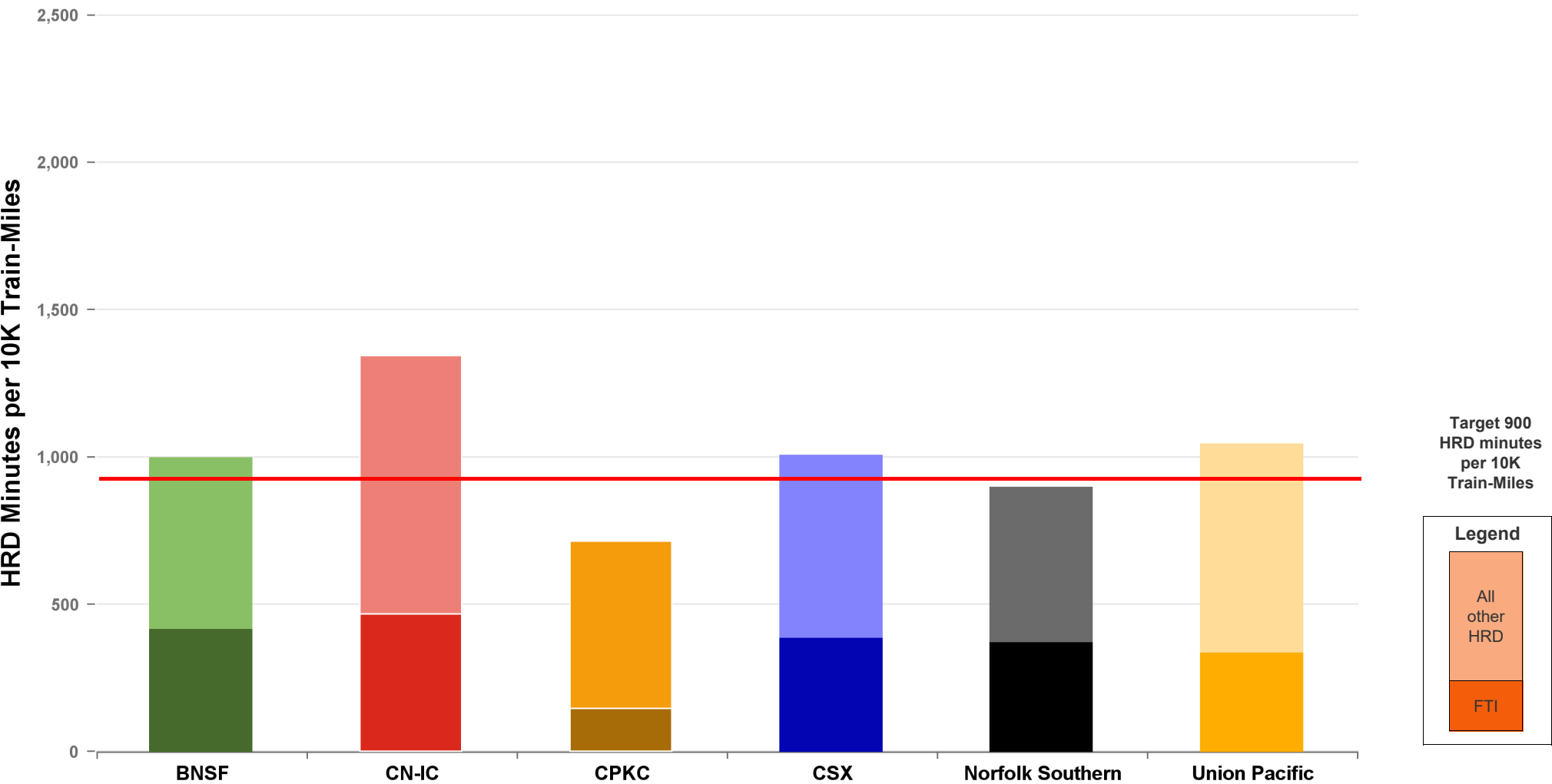
A monthly update of the Host Railroad Report Card, which grades the six major host railroads based on host responsible delay (HRD) minutes per 10,000 train-miles for the current month (lighter shade) and the most recent 12 months.



Total Host-Responsible Delays

1 Year Snapshot

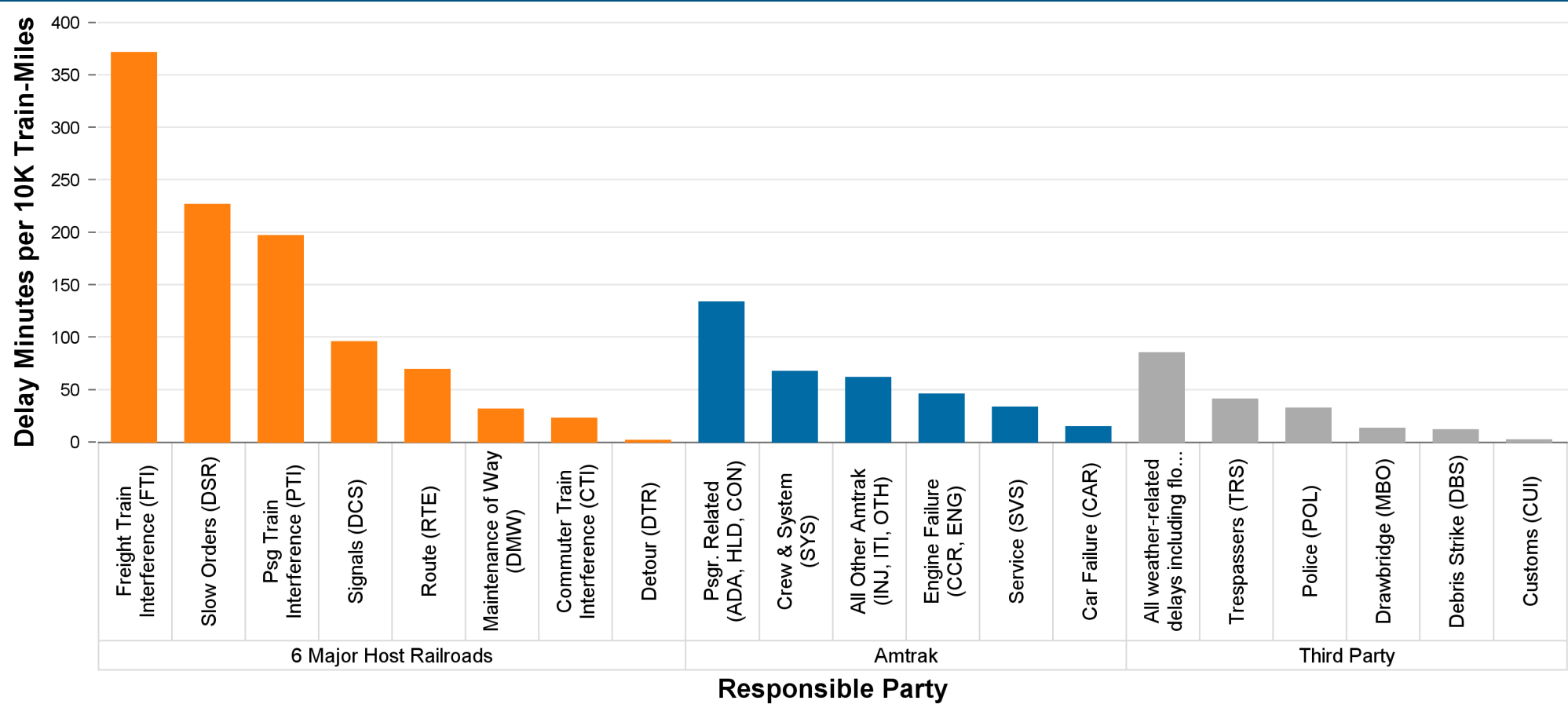
Total host-responsible delay (HRD) minutes per 10,000 train-miles incurred by Amtrak trains on the six major host railroads, with delays attributable to freight train interference (FTI) shaded.



Delays to Amtrak Trains by Responsible Party

1 Year Snapshot

Delay minutes per 10,000 train-miles on the six major host railroads categorized by delay type and responsible party.

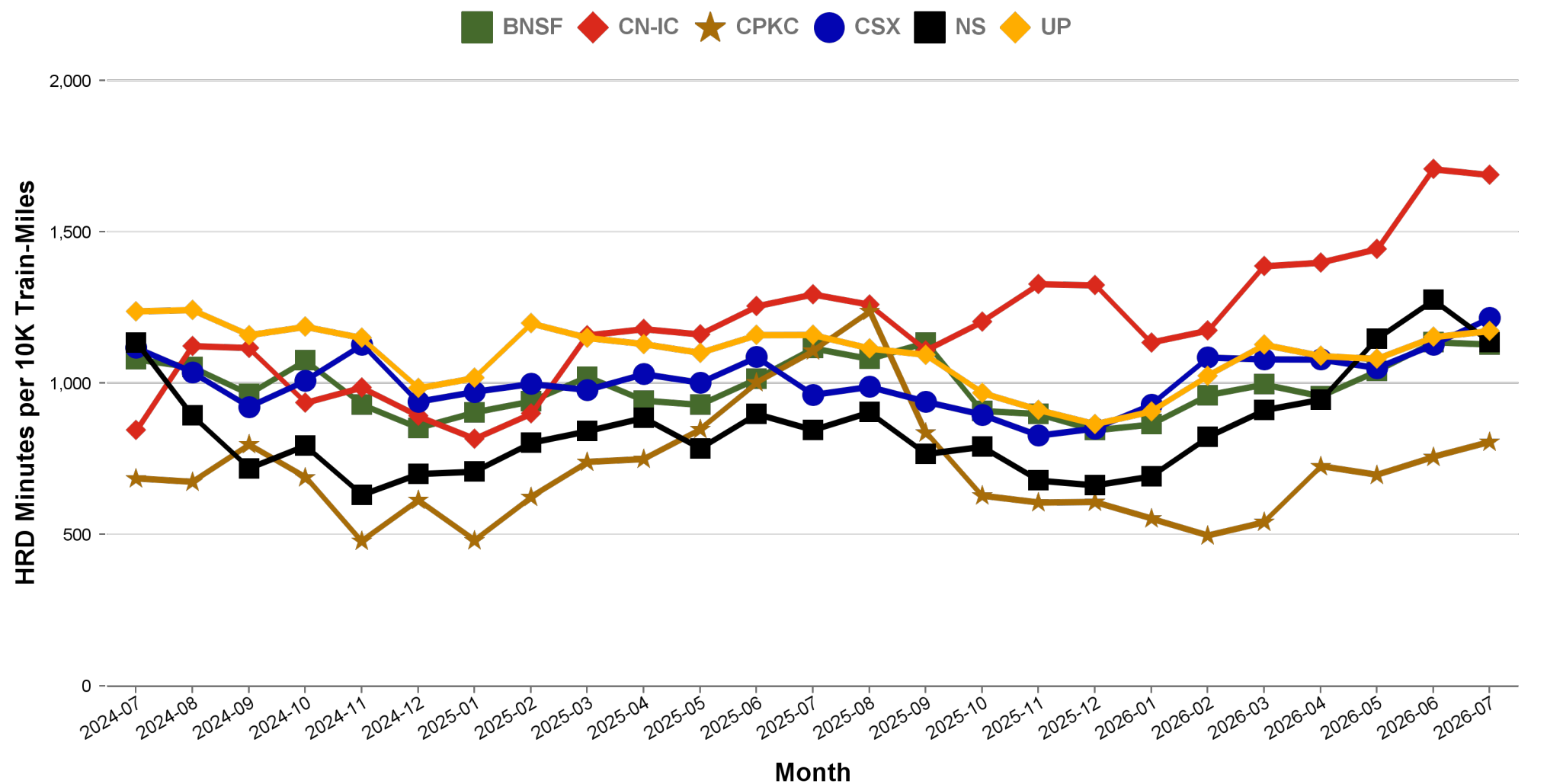


Responsible Party	6 Major Host Railroads	Amtrak	Third Party
Delay Minutes per 10K Train-Miles	1007	347	177
Percentage of Total Delays	65.8%	22.7%	11.6%

Total Host-Responsible Delays

2 Year Snapshot

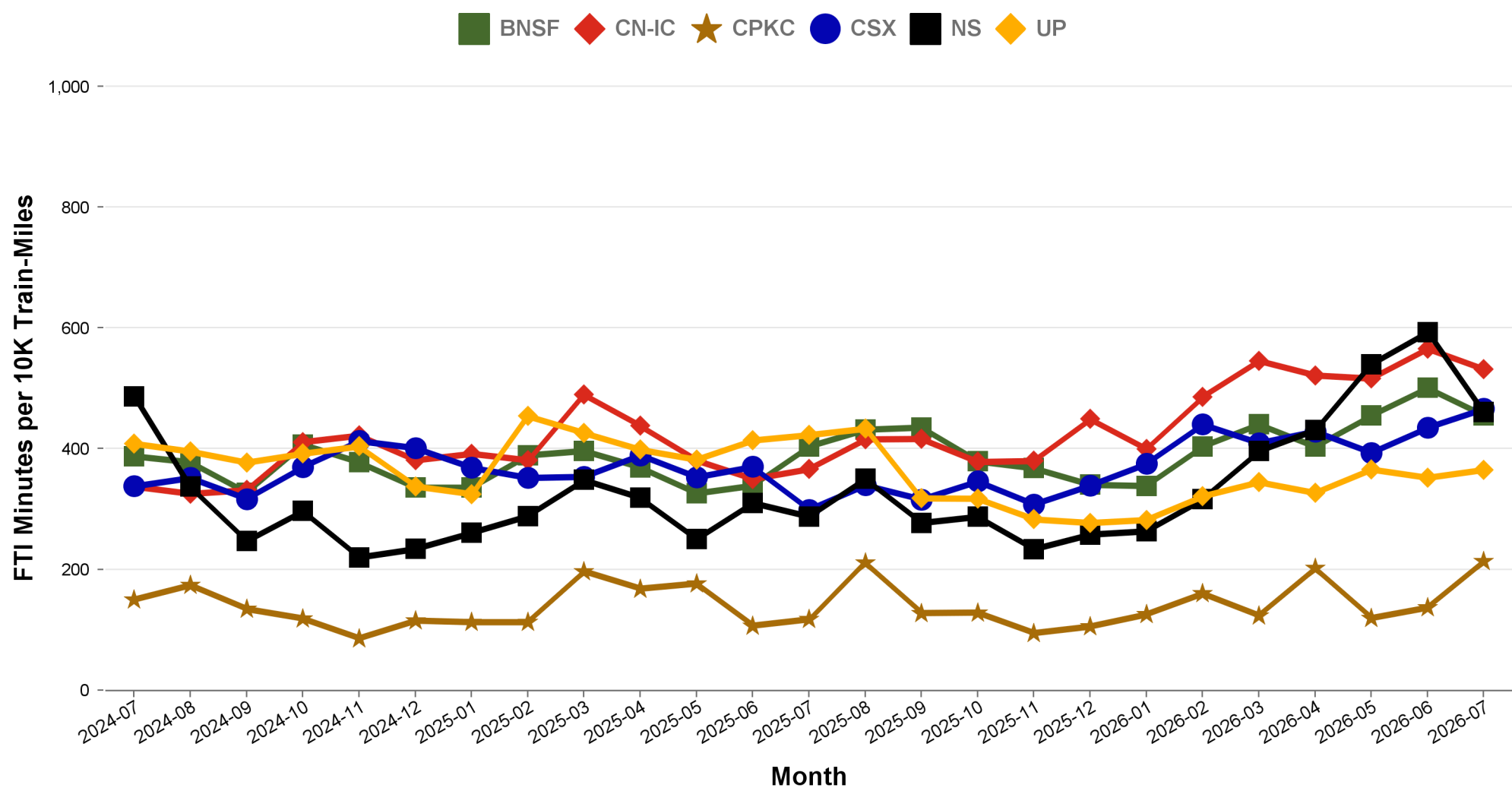
Total host-responsible delay (HRD) minutes per 10,000 train-miles incurred by Amtrak trains on each of the six major host railroads for the most recent two years.



Freight Train Interference Delays

2 Year Snapshot

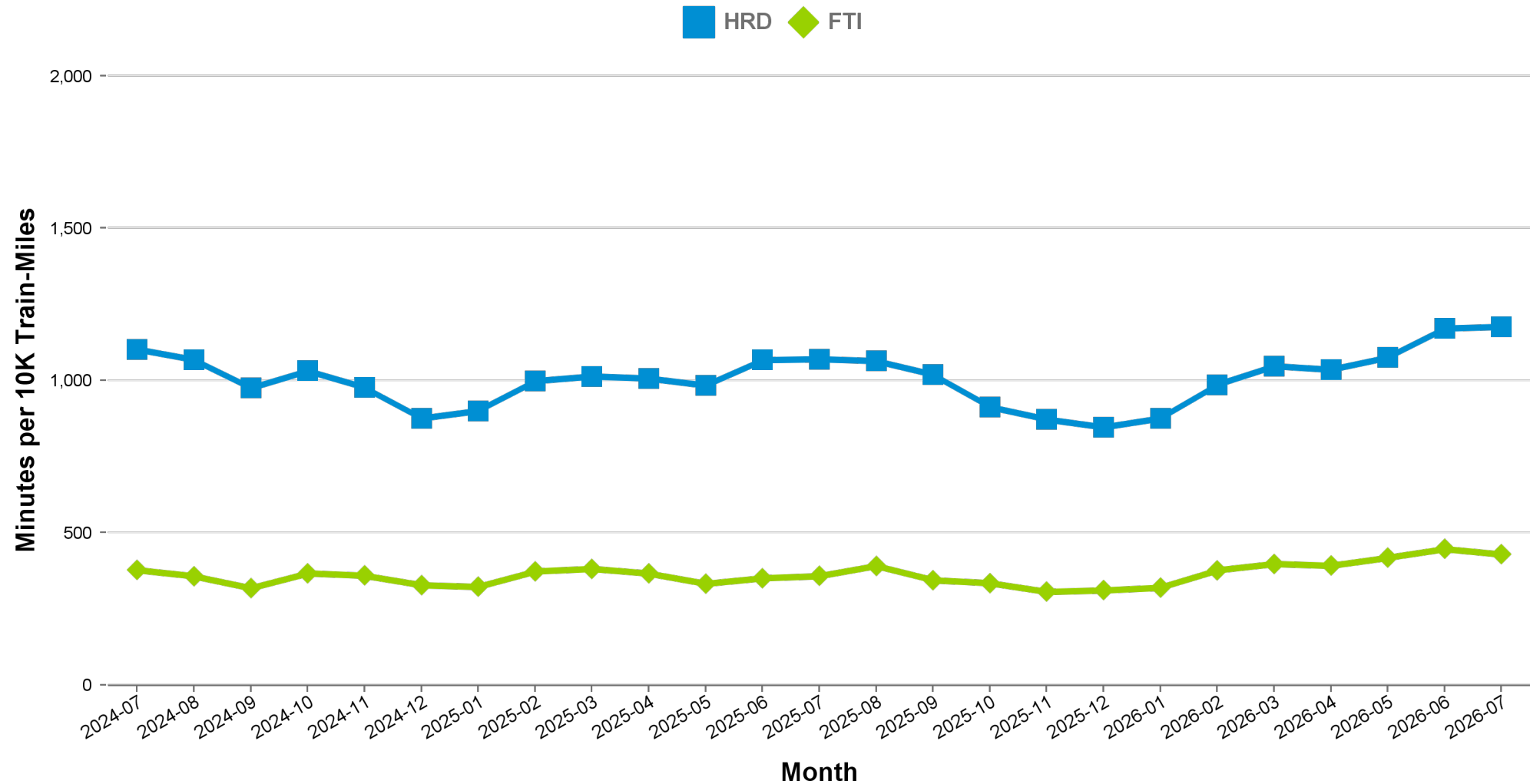
Total delay minutes per 10,000 train-miles attributable to freight train interference (FTI) incurred by Amtrak trains on each of the six major host railroads for the most recent two years.



Aggregated Host Railroad Performance Trend

2 Year Snapshot

Total host-responsible delay (HRD) and freight interference (FTI) minutes per 10,000 train-miles incurred by Amtrak trains, aggregated for the six major host railroads for the most recent two years.



Minutes of Delay per 10K Train Miles by Host for July 2026

CPA 2026-07-01 FD 36873

Host	Service	Total Host Responsible Delays		Largest Two Delay Categories - Current Month				Route Miles
		Current Month	Most Recent 12 Months	#1		#2		
Target		900	900					
BNSF	California Zephyr	878	842	FTI	324	DSR	239	1027
	Carl Sandburg / Illinois Zephyr	1239	833	FTI	453	DSR	255	257
	Cascades	830	1040	FTI	246	DSR	186	317
	Coast Starlight	658	937	PTI	167	RTE	147	158
	Empire Builder	1065	914	FTI	717	DSR	165	2147
	Gold Runner	1330	1105	PTI	516	FTI	359	284
	Heartland Flyer	2108	1879	DSR	1331	FTI	685	236
	Pacific Surfliner	1314	1159	FTI	338	DSR	285	22
	Southwest Chief	1146	935	FTI	477	DSR	309	2206
	Sunset Ltd	1059	1089	DSR	637	DCS	229	190
	Texas Eagle	2106	1684	DSR	718	FTI	673	116
CN-IC	Blue Water	2641	1436	DSR	1849	FTI	724	159
	City Of New Orleans	1560	1248	DSR	605	FTI	447	930
	Illini / Saluki	1004	917	DSR	452	FTI	334	304
	Lincoln / Missouri	2707	2681	FTI	1463	DSR	534	35
	Lincoln Service	1917	2109	FTI	1298	DSR	244	35
	Texas Eagle	2083	2330	FTI	1542	DSR	230	35
	Wolverine	4925	3510	DSR	3696	FTI	499	27
CPKC	Adirondack	1189	1006	PTI	774	FTI	206	178
	Borealis	953	822	DSR	326	FTI	282	376
	Empire Builder	937	758	DSR	318	FTI	309	384
	Ethan Allen Express	1332	1786	PTI	455	DCS	444	60
	Hiawatha	161	169	DCS	57	FTI	31	53
CSX	Auto Train	1332	1153	FTI	544	DSR	362	898
	Cardinal	981	830	FTI	497	DSR	285	703
	Carolinian	1415	1623	PTI	400	FTI	355	295
	Downeaster	630	641	PTI	347	DCS	119	107
	Floridian	1094	1008	FTI	366	DSR	208	1413
	Lake Shore Ltd	842	804	FTI	455	RTE	133	741
	Maple Leaf	926	831	FTI	402	DSR	221	298
	Mardi Gras Service	3856	2478	FTI	2287	DSR	663	137
	New York - Niagara Falls	858	747	FTI	341	DSR	258	296
	Palmetto	1161	963	FTI	555	PTI	233	659
	Pere Marquette	586	394	DSR	285	DCS	247	135
	Richmond / Newport News / Norfolk	1705	1167	FTI	416	DSR	279	189
	Silver Meteor	1072	805	FTI	394	DSR	250	1152
NS	Blue Water	2587	2236	FTI	1526	DCS	746	39
	Cardinal	1715	1325	PTI	829	DSR	431	79
	Carolinian	843	636	PTI	323	DSR	219	202
	Crescent	1301	966	FTI	582	DSR	315	1141
	Floridian	1246	1047	FTI	652	RTE	206	518
	Lake Shore Ltd	1082	1077	FTI	650	RTE	140	339
	Pennsylvanian	1153	761	DSR	536	FTI	323	249
	Pere Marquette	1425	1673	FTI	745	RTE	240	39
	Piedmont	714	668	PTI	277	DSR	219	173
	Richmond / Newport News / Norfolk	430	384	DCS	181	RTE	109	81
	Roanoke	905	581	PTI	308	FTI	217	216
	Wolverine	2244	2100	FTI	1330	DCS	373	39
UP	California Zephyr	920	834	DSR	383	FTI	258	1381
	Capitol Corridor	772	735	PTI	385	DSR	114	171
	Cascades	1727	1522	DSR	800	PTI	420	125
	Coast Starlight	1316	1260	DCS	322	DSR	310	1162
	Gold Runner	1353	1253	DSR	410	PTI	394	88
	Lincoln / Missouri	1030	897	FTI	427	DSR	245	502
	Lincoln Service	1065	973	FTI	416	PTI	325	231
	Missouri	1396	809	FTI	793	PTI	231	271
	Pacific Surfliner	1486	1184	PTI	893	DCS	458	174
	Sunset Ltd	1357	1167	FTI	876	RTE	187	1784
	Texas Eagle	1462	1341	FTI	768	DSR	273	1073

Minutes of Delay per 10K Train Miles by Host for July 2026

Host	Service	Total Host Responsible Delays		Largest Two Delay Categories - Current Month				Route Miles
		Current Month	Most Recent 12 Months	#1		#2		
Target		900	900					
Amtrak	Adirondack	531	430	PTI	223	DSR	122	100
	Blue Water	381	291	PTI	145	DSR	125	99
	Ethan Allen Express	842	491	PTI	260	DSR	170	100
	Maple Leaf	585	473	PTI	171	RTE	144	109
	New York - Albany	508	383	PTI	132	DSR	113	81
	New York - Niagara Falls	578	398	PTI	185	DCS	141	109
	Wolverine	444	406	PTI	221	DSR	118	99
BBrRR	Cardinal	3732	1797	DSR	1984	PTI	804	132
CN-Canada	Adirondack	2354	2863	RTE	767	DSR	638	49
Fla DOT	Floridian	1616	1217	CTI	1038	DSR	306	70
	Silver Meteor	1221	1301	CTI	651	DSR	201	70
FR	Auto Train	3948	4119	CTI	2919	DSR	564	16
	Floridian	2095	2405	CTI	788	DSR	751	61
	Silver Meteor	2621	2209	CTI	1234	DSR	471	61
MADOT	Springfield Shuttles	92	257	FTI	47	DSR	18	36
	Vermonter	1209	379	DCS	498	DSR	350	50
MBTA	Downeaster	690	709	DCS	381	PTI	144	38
Metra	Borealis	1748	1394	CTI	897	DCS	245	33
	Empire Builder	1748	2262	CTI	1107	DMW	311	29
	Hiawatha	1904	1983	CTI	1345	DCS	168	29
MIDOT	Blue Water	623	412	PTI	587	RTE	37	22
	Wolverine	793	752	PTI	590	DSR	123	134
MNRR	Acela	1926	1715	DSR	1337	CTI	359	56
	Adirondack	1410	1226	CTI	874	DSR	241	64
	Ethan Allen Express	3679	1996	CTI	2491	RTE	424	64
	Lake Shore Ltd	1816	1220	CTI	871	RTE	411	64
	Maple Leaf	1588	1364	CTI	939	RTE	450	64
	New York - Albany	1358	1038	CTI	664	DSR	278	64
	New York - Niagara Falls	2119	1258	CTI	1088	DMW	523	64
	Richmond / Newport News / Norfolk	2058	1724	DSR	1123	CTI	608	56
	Vermonter	2604	2498	DSR	1287	CTI	968	56
NECR	Vermonter	746	604	DSR	659	RTE	33	192
NMDOT	Southwest Chief	1896	2000	CTI	1464	PTI	266	80
SCRRA	Coast Starlight	1770	1641	PTI	1105	CTI	400	48
	Pacific Surfliner	1850	1065	PTI	683	CTI	536	95
SDNRR	Pacific Surfliner	2272	1320	DSR	685	PTI	571	60
Sounder	Cascades	1100	1004	PTI	750	CTI	246	20
	Coast Starlight	1500	2415	PTI	984	CTI	419	20
TRE	Texas Eagle	1314	1046	CTI	578	RTE	407	33
VTR	Ethan Allen Express	375	748	DSR	235	DCS	106	91

The numbers included in this document are preliminary and are for informational purposes only.
Excludes hosts with fewer than 15 route miles.
Delays on the Amtrak-owned portion of the Northeast Corridor are shown in a separate report, with tighter delay standards.
Northeast Regional: Roanoke includes all trains between Roanoke and points on the NEC; Richmond / Newport News / Norfolk includes all trains between these locations and points on the NEC.



Minutes of Delay per 10K Train Miles by Service for July 2026

Service		Host	Total Host Responsible Delays		Largest Two Delay Categories - Current Month				Route Miles
			Current	Most	#1		#2		
Target			900	900					
Acela									
Acela		MNRR	1926	1715	DSR	1337	CTI	359	56
All Other NEC Corridor Routes									
Northeast Regional	Richmond / Newport News / Norfolk	CSX	1705	1167	FTI	416	DSR	279	189
		NS	430	384	DCS	181	RTE	109	81
		MNRR	2058	1724	DSR	1123	CTI	608	56
	Roanoke	NS	905	581	PTI	308	FTI	217	216
	Springfield Shuttles	MADOT	92	257	FTI	47	DSR	18	36

Minutes of Delay per 10K Train Miles by Service for July 2026

Service		Host	Total Host Responsible Delays		Largest Two Delay Categories - Current Month				Route Miles
			Current	Most	#1		#2		
Target			900	900					
Non-NEC Corridor Routes									
Borealis		CPKC	953	822	DSR	326	FTI	282	376
		Metra	1748	1394	CTI	897	DCS	245	33
Capitol Corridor		UP	772	735	PTI	385	DSR	114	171
Carolinian		CSX	1415	1623	PTI	400	FTI	355	295
		NS	843	636	PTI	323	DSR	219	202
Cascades		BNSF	830	1040	FTI	246	DSR	186	317
		UP	1727	1522	DSR	800	PTI	420	125
		Sounder	1100	1004	PTI	750	CTI	246	20
Downeaster		CSX	630	641	PTI	347	DCS	119	107
		MBTA	690	709	DCS	381	PTI	144	38
Empire	Adirondack	CPKC	1189	1006	PTI	774	FTI	206	178
		Amtrak	531	430	PTI	223	DSR	122	100
		CN-Canada	2354	2863	RTE	767	DSR	638	49
		MNRR	1410	1226	CTI	874	DSR	241	64
	Ethan Allen Express	CPKC	1332	1786	PTI	455	DCS	444	60
		Amtrak	842	491	PTI	260	DSR	170	100
		MNRR	3679	1996	CTI	2491	RTE	424	64
		VTR	375	748	DSR	235	DCS	106	91
	Maple Leaf	CSX	926	831	FTI	402	DSR	221	298
		Amtrak	585	473	PTI	171	RTE	144	109
		MNRR	1588	1364	CTI	939	RTE	450	64
	New York - Albany	Amtrak	508	383	PTI	132	DSR	113	81
		MNRR	1358	1038	CTI	664	DSR	278	64
	New York - Niagara Falls	CSX	858	747	FTI	341	DSR	258	296
		Amtrak	578	398	PTI	185	DCS	141	109
		MNRR	2119	1258	CTI	1088	DMW	523	64
Gold Runner		BNSF	1330	1105	PTI	516	FTI	359	284
		UP	1353	1253	DSR	410	PTI	394	88
Heartland Flyer		BNSF	2108	1879	DSR	1331	FTI	685	236
Hiawatha		CPKC	161	169	DCS	57	FTI	31	53
		Metra	1904	1983	CTI	1345	DCS	168	29
Illinois	Carl Sandburg / Illinois Zephyr	BNSF	1239	833	FTI	453	DSR	255	257
	Illini / Saluki	CN-IC	1004	917	DSR	452	FTI	334	304
	Lincoln Service	CN-IC	1917	2109	FTI	1298	DSR	244	35
		UP	1065	973	FTI	416	PTI	325	231
Lincoln / Missouri		CN-IC	2707	2681	FTI	1463	DSR	534	35
		UP	1030	897	FTI	427	DSR	245	502
Mardi Gras Service		CSX	3856	2478	FTI	2287	DSR	663	137
Michigan	Blue Water	CN-IC	2641	1436	DSR	1849	FTI	724	159
		NS	2587	2236	FTI	1526	DCS	746	39
		Amtrak	381	291	PTI	145	DSR	125	99
		MIDOT	623	412	PTI	587	RTE	37	22
	Pere Marquette	CSX	586	394	DSR	285	DCS	247	135
		NS	1425	1673	FTI	745	RTE	240	39
	Wolverine	CN-IC	4925	3510	DSR	3696	FTI	499	27
		NS	2244	2100	FTI	1330	DCS	373	39
		Amtrak	444	406	PTI	221	DSR	118	99
		MIDOT	793	752	PTI	590	DSR	123	134
Missouri		UP	1396	809	FTI	793	PTI	231	271
Pacific Surfliner		BNSF	1314	1159	FTI	338	DSR	285	22
		UP	1486	1184	PTI	893	DCS	458	174
		SCRRA	1850	1065	PTI	683	CTI	536	95
		SDNRR	2272	1320	DSR	685	PTI	571	60
Pennsylvanian		NS	1153	761	DSR	536	FTI	323	249
Piedmont		NS	714	668	PTI	277	DSR	219	173
Vermont		MADOT	1209	379	DCS	498	DSR	350	50
		MNRR	2604	2498	DSR	1287	CTI	968	56
		NECR	746	604	DSR	659	RTE	33	192

Minutes of Delay per 10K Train Miles by Service for July 2026

Service		Host	Total Host Responsible Delays		Largest Two Delay Categories - Current Month				Route Miles
			Current	Most	#1		#2		
Target			900	900					
Long-Distance Routes									
Auto Train		CSX	1332	1153	FTI	544	DSR	362	898
		FR	3948	4119	CTI	2919	DSR	564	16
California Zephyr		BNSF	878	842	FTI	324	DSR	239	1027
		UP	920	834	DSR	383	FTI	258	1381
Cardinal		CSX	981	830	FTI	497	DSR	285	703
		NS	1715	1325	PTI	829	DSR	431	79
		BBrRR	3732	1797	DSR	1984	PTI	804	132
City Of New Orleans		CN-IC	1560	1248	DSR	605	FTI	447	930
Coast Starlight		BNSF	658	937	PTI	167	RTE	147	158
		UP	1316	1260	DCS	322	DSR	310	1162
		SCRRA	1770	1641	PTI	1105	CTI	400	48
		Sounder	1500	2415	PTI	984	CTI	419	20
Crescent		NS	1301	966	FTI	582	DSR	315	1141
Empire Builder		BNSF	1065	914	FTI	717	DSR	165	2147
		CPKC	937	758	DSR	318	FTI	309	384
		Metra	1748	2262	CTI	1107	DMW	311	29
Floridian		CSX	1094	1008	FTI	366	DSR	208	1413
		NS	1246	1047	FTI	652	RTE	206	518
		Fla DOT	1616	1217	CTI	1038	DSR	306	70
		FR	2095	2405	CTI	788	DSR	751	61
Lake Shore Ltd		CSX	842	804	FTI	455	RTE	133	741
		NS	1082	1077	FTI	650	RTE	140	339
		MNRR	1816	1220	CTI	871	RTE	411	64
Palmetto		CSX	1161	963	FTI	555	PTI	233	659
Silver Meteor		CSX	1072	805	FTI	394	DSR	250	1152
		Fla DOT	1221	1301	CTI	651	DSR	201	70
		FR	2621	2209	CTI	1234	DSR	471	61
Southwest Chief		BNSF	1146	935	FTI	477	DSR	309	2206
		NMDOT	1896	2000	CTI	1464	PTI	266	80
Sunset Ltd		BNSF	1059	1089	DSR	637	DCS	229	190
		UP	1357	1167	FTI	876	RTE	187	1784
Texas Eagle		BNSF	2106	1684	DSR	718	FTI	673	116
		CN-IC	2083	2330	FTI	1542	DSR	230	35
		UP	1462	1341	FTI	768	DSR	273	1073
		TRE	1314	1046	CTI	578	RTE	407	33

The numbers included in this document are preliminary and are for informational purposes only.

Excludes hosts with fewer than 15 route miles.

Delays on the Amtrak-owned portion of the Northeast Corridor are shown in a separate report, with tighter delay standards.

Northeast Regional: Roanoke includes all trains between Roanoke and points on the NEC; Richmond / Newport News / Norfolk includes all trains between these locations and points on the NEC.



Service	All-Stations OTP		Customer OTP		Avg Mins Late per Late Rider**	
	Current Month	Most Recent 12 Months	Current Month	Most Recent 12 Months	Current Month	Most Recent 12 Months
Amtrak System	67.4%	75.6%	65.6%	75.2%	63	55
NEC Corridor Routes	74.8%	81.6%	70.4%	78.7%	49	44
Minimum Standard			80.0%	80.0%		
Acela*	73.9%	78.4%	69.6%	75.6%	43	43
Keystone	88.1%	91.5%	87.9%	90.4%	41	36
Northeast Regional	70.3%	78.9%	67.1%	77.0%	51	45
On Spine Northeast Regional	74.3%	80.3%	72.9%	79.1%	46	45
Richmond / Newport News / Norfolk	63.5%	75.1%	57.8%	72.1%	52	44
Roanoke	68.1%	81.2%	61.6%	78.9%	69	53
Springfield Shuttles	74.9%	81.5%	71.3%	84.9%	42	39
Non-NEC Corridor Routes	73.7%	79.7%	68.1%	76.3%	48	45
Minimum Standard			80.0%	80.0%		
Borealis	80.5%	80.2%	72.2%	74.2%	58	52
Capitol Corridor	87.9%	88.8%	85.6%	86.8%	50	37
Carolinian	54.9%	65.6%	45.6%	62.7%	58	50
Cascades	80.1%	77.5%	72.1%	72.5%	37	41
Downeaster	87.7%	90.6%	83.3%	87.9%	40	38
Empire	69.1%	76.4%	63.5%	74.5%	41	43
Adirondack	64.8%	72.7%	60.4%	64.2%	42	46
Berkshire Flyer	53.5%	55.6%	40.3%	49.8%	40	53
Ethan Allen Express	51.9%	69.3%	29.1%	61.0%	40	41
Maple Leaf	55.3%	59.7%	60.7%	59.6%	50	52
New York - Albany	82.0%	85.1%	74.0%	82.1%	40	38
New York - Niagara Falls	71.3%	80.1%	62.6%	76.9%	38	42
Gold Runner	58.8%	66.3%	52.7%	61.1%	52	49
Heartland Flyer	56.5%	65.0%	45.1%	59.1%	37	41
Hiawatha	91.5%	90.6%	88.7%	88.0%	43	41
Illinois	67.3%	75.7%	66.0%	73.0%	44	43
Carl Sandburg / Illinois Zephyr	63.2%	74.4%	57.7%	72.2%	40	41
Illini / Saluki	69.1%	79.5%	69.2%	76.6%	52	44
Lincoln Service	68.8%	73.8%	67.1%	70.7%	42	44
Lincoln / Missouri	44.0%	54.2%	40.4%	50.2%	65	51
Mardi Gras Service	73.8%	87.5%	59.6%	78.9%	53	46
Michigan	65.5%	68.8%	64.3%	66.4%	62	56
Blue Water	61.1%	68.2%	46.7%	60.0%	47	55
Pere Marquette	84.3%	82.6%	83.6%	80.5%	72	55
Wolverine	64.4%	67.1%	66.9%	65.8%	71	56
Missouri	49.2%	77.7%	50.7%	76.5%	71	47
Pacific Surfliner	76.2%	85.0%	69.0%	82.6%	45	45
Pennsylvanian	71.7%	79.5%	67.7%	81.2%	56	54
Piedmont	65.0%	81.8%	62.5%	75.5%	50	38
Vermonteer	65.9%	75.4%	59.4%	72.5%	48	39
Long-Distance Routes	35.6%	53.1%	38.3%	56.7%	114	95
Minimum Standard			80.0%	80.0%		
Auto Train	75.0%	78.3%	61.0%	65.8%	99	87
California Zephyr	32.1%	57.6%	31.4%	60.0%	102	108
Cardinal	34.7%	50.5%	34.5%	52.3%	145	93
City Of New Orleans	29.5%	57.0%	38.9%	68.7%	72	77
Coast Starlight	59.4%	61.6%	59.2%	65.0%	67	76
Crescent	47.6%	68.3%	54.0%	71.4%	117	75
Empire Builder	32.4%	46.8%	33.0%	49.1%	160	135
Floridian	12.7%	31.4%	9.3%	31.7%	160	110
Lake Shore Ltd	60.1%	67.0%	63.0%	69.8%	54	70
Palmetto	50.8%	71.2%	41.9%	71.0%	51	50
Silver Meteor	25.6%	57.4%	17.4%	56.0%	105	74
Southwest Chief	23.7%	33.7%	26.2%	32.1%	122	112
Sunset Ltd	30.5%	52.9%	37.1%	61.3%	151	95
Texas Eagle	36.4%	52.6%	39.0%	57.9%	107	87

The numbers included in this document are preliminary and are for informational purposes only.
Northeast Regional: Roanoke includes all trains between Roanoke and points on the NEC; Richmond/Newport News/Norfolk includes all trains between these locations and points on the NEC.
* Acela on-time performance target is 90.0%
** Excludes on-time Customers



Host Railroad Responsible Delays

Code	Code Description	Explanation
CTI	Commuter Train Interference	Delays for meeting or following commuter trains
DCS	Signal Delays	Signal failure or All Other signal delays, wayside defect-detector false-alarms, defective road crossing protection, efficiency tests, drawbridge stuck open
DMW	Maintenance of Way	Maintenance of Way delays including holds for track repairs or MW foreman to clear
DSR	Slow Order Delays	Temporary slow orders, except heat or cold orders
DTR	Detour	Delays from detours
FTI	Freight Train Interference	Delays from freight trains
PTI	Passenger Train Interference	Delays for meeting or following All Other passenger trains
RTE	Routing	Routing-dispatching delays including diversions, late track bulletins, etc.

Amtrak Responsible Delays

Code	Code Description	Explanation
ADA	Passenger Related	All delays related to disabled passengers, wheel chair lifts, guide dogs, etc.
CAR	Car Failure	Mechanical failure on all types of cars
CCR	Cab Car Failure	Mechanical failure on Cab Cars
CON	Hold for Connection	Holding for connections from All Other trains or buses.
ENG	Locomotive Failure	Mechanical failure on engines.
HLD	Passenger Related	All delays related to passengers, checked-baggage, large groups, etc.
INJ	Injury Delay	Delay due to injured passengers or employees.
ITI	Initial Terminal Delay	Delay at initial terminal due to late arriving inbound trains causing late release of equipment.
OTH	Miscellaneous Delays	Lost-on-run, heavy trains, unable to make normal speed, etc.
SVS	Servicing	All switching and servicing delays
SYS	Crew & System	Delays related to crews including lateness, lone-engineer delays

Third-Party Delays

Code	Code Description	Explanation
CUI	Customs	U.S. and Canadian customs delays; Immigration-related delays
DBS	Debris	Debris strikes
MBO	Drawbridge Openings	Movable bridge openings for marine traffic where no bridge failure is involved
NOD	Unused Recovery Time	Wait for departure time
POL	Police-Related	Police/fire department holds on right-of-way or on-board trains
TRS	Trespassers	Trespasser incidents including road crossing accidents, trespasser / animal strikes, vehicle stuck on track ahead, bridge strikes
WTR	Weather-Related	All weather-related delays including floods/washouts, earthquake-related delays, heat or cold orders, slippery rail due to leaves

*These delay codes are applicable to Off-NEC routes only.



Host Railroad Report

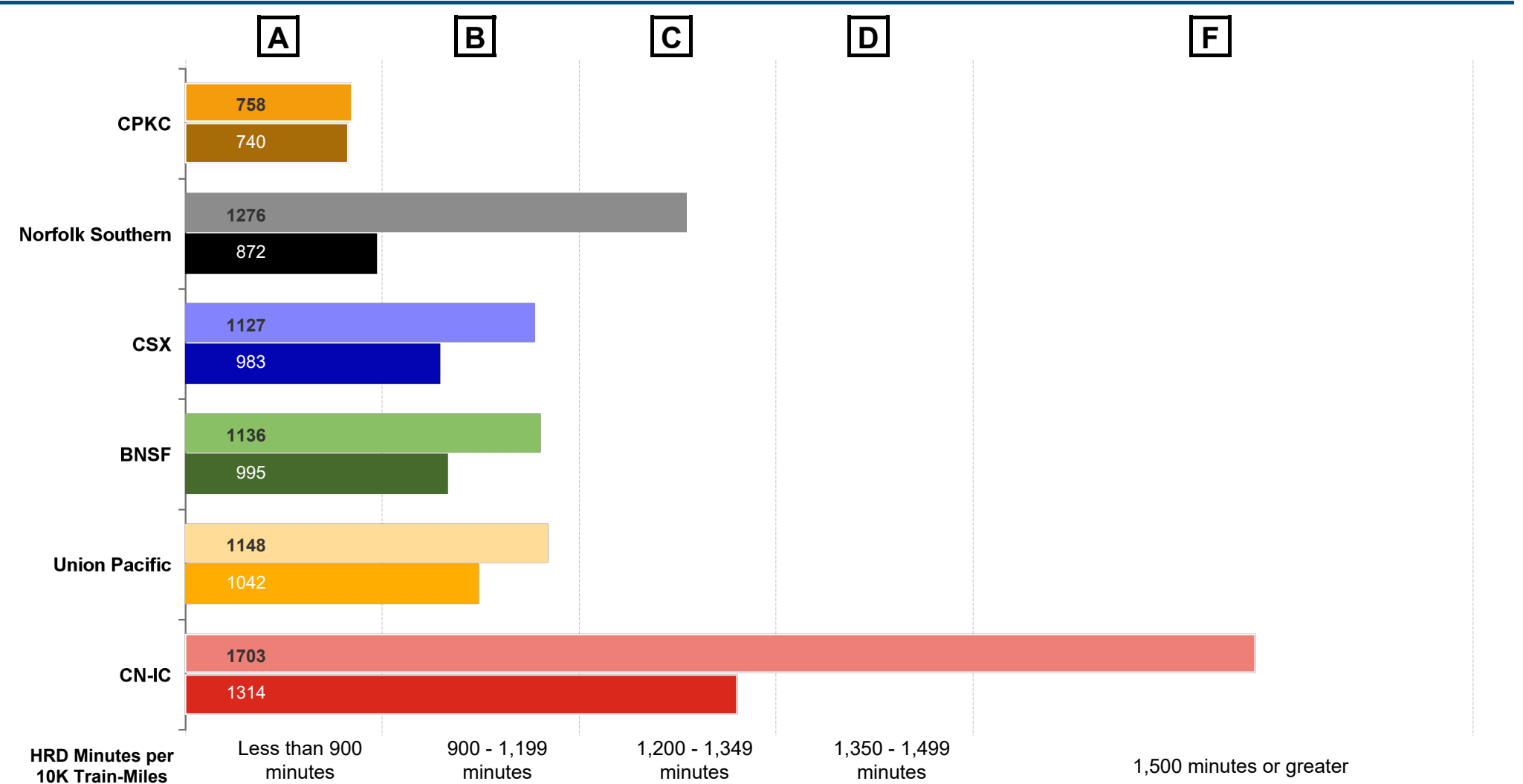
Amtrak Train Performance on Host Railroads

Data through June 2026

Host Railroad Report Card Update

Current Month and 1 Year Snapshot

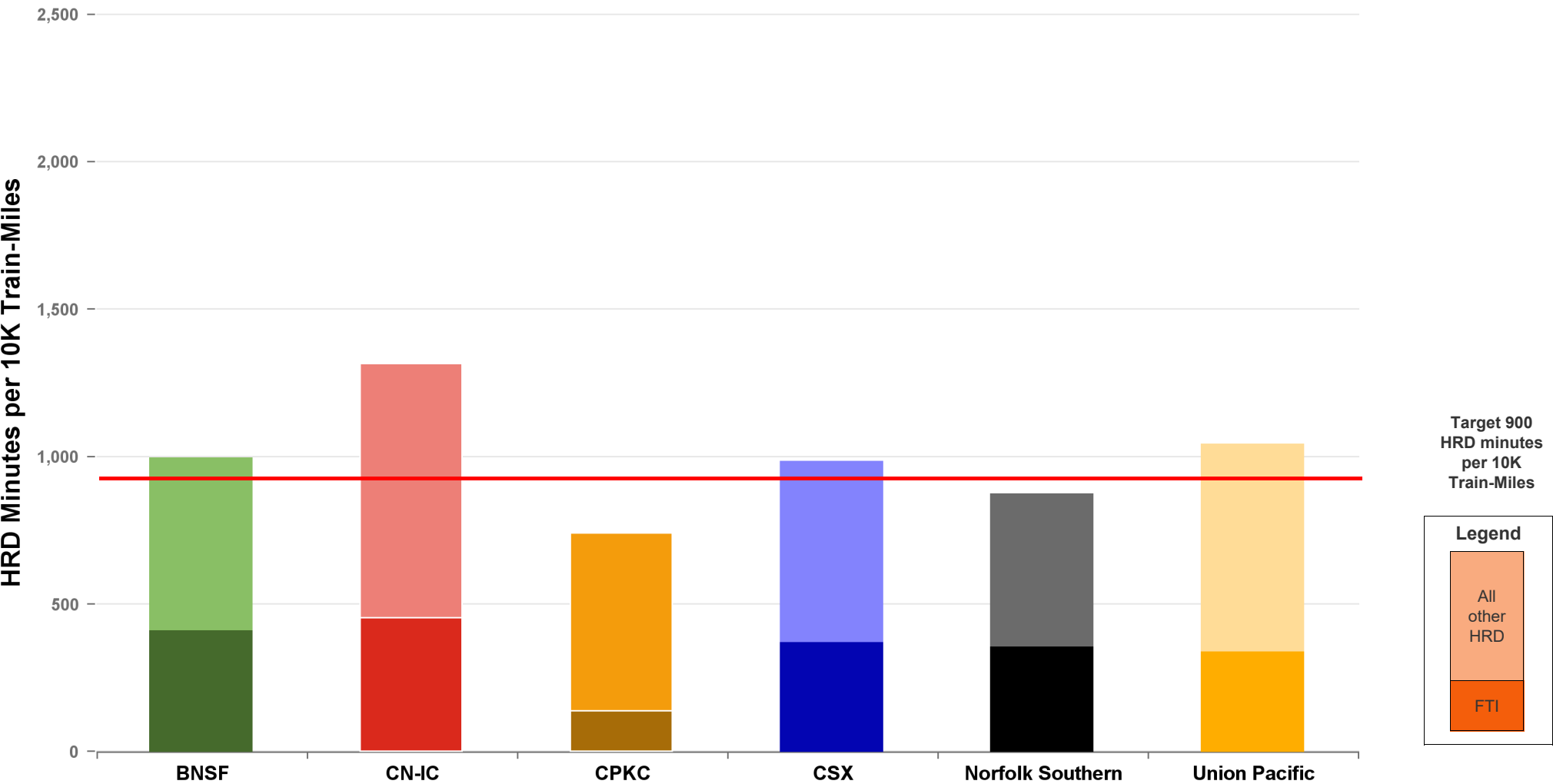
A monthly update of the Host Railroad Report Card, which grades the six major host railroads based on host responsible delay (HRD) minutes per 10,000 train-miles for the current month (lighter shade) and the most recent 12 months.



Total Host-Responsible Delays

1 Year Snapshot

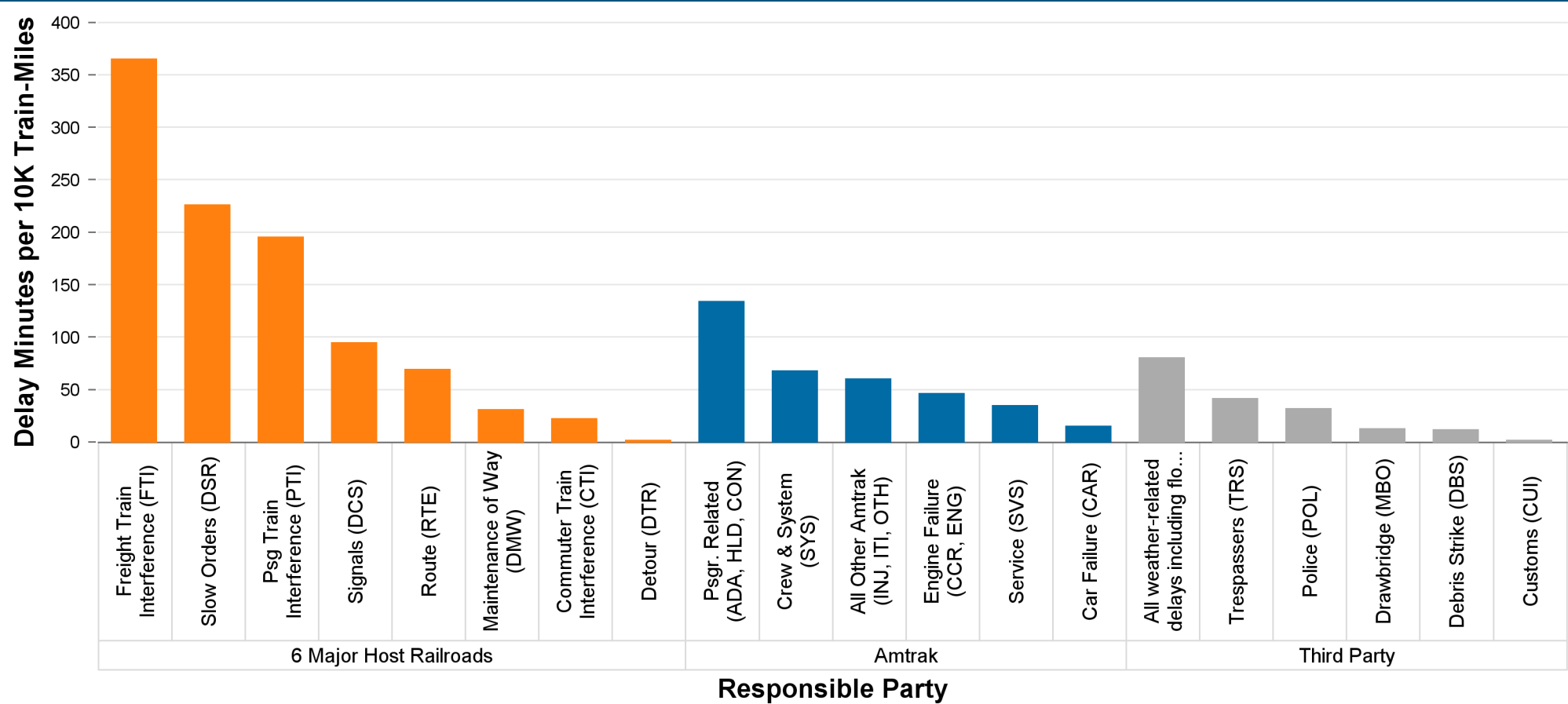
Total host-responsible delay (HRD) minutes per 10,000 train-miles incurred by Amtrak trains on the six major host railroads, with delays attributable to freight train interference (FTI) shaded.



Delays to Amtrak Trains by Responsible Party

1 Year Snapshot

Delay minutes per 10,000 train-miles on the six major host railroads categorized by delay type and responsible party.

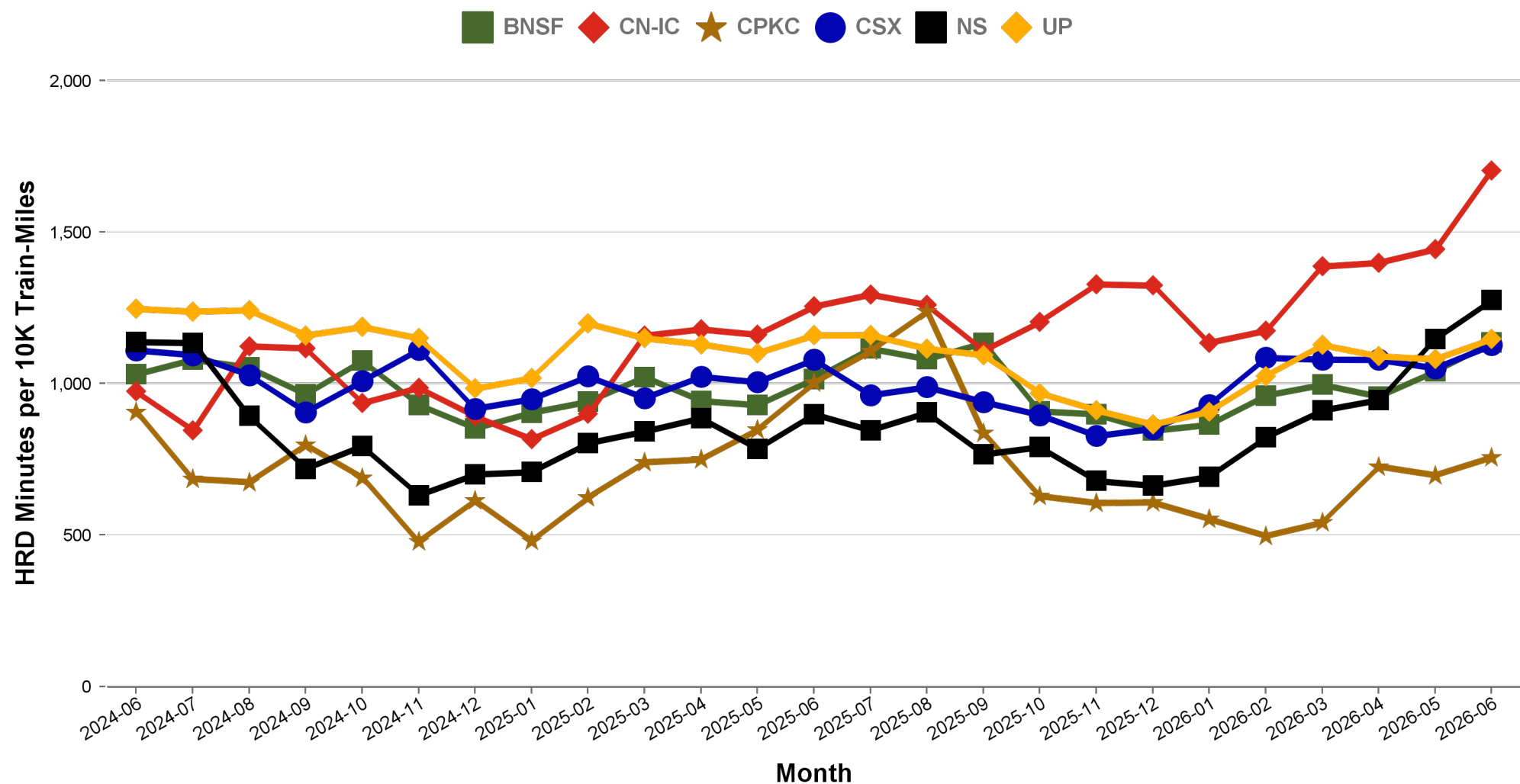


Responsible Party	6 Major Host Railroads	Amtrak	Third Party
Delay Minutes per 10K Train-Miles	998	351	169
Percentage of Total Delays	65.7%	23.1%	11.1%

Total Host-Responsible Delays

2 Year Snapshot

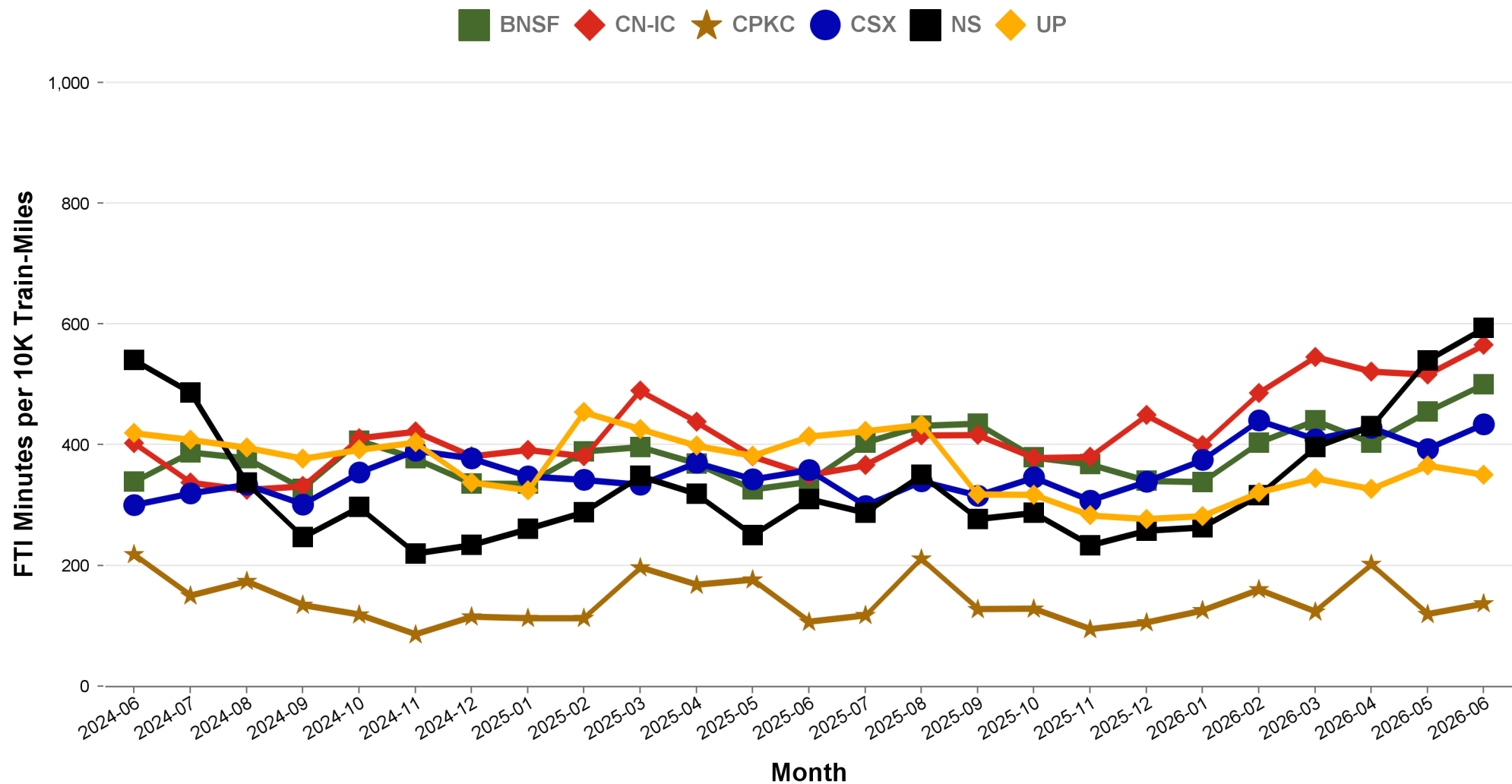
Total host-responsible delay (HRD) minutes per 10,000 train-miles incurred by Amtrak trains on each of the six major host railroads for the most recent two years.



Freight Train Interference Delays

2 Year Snapshot

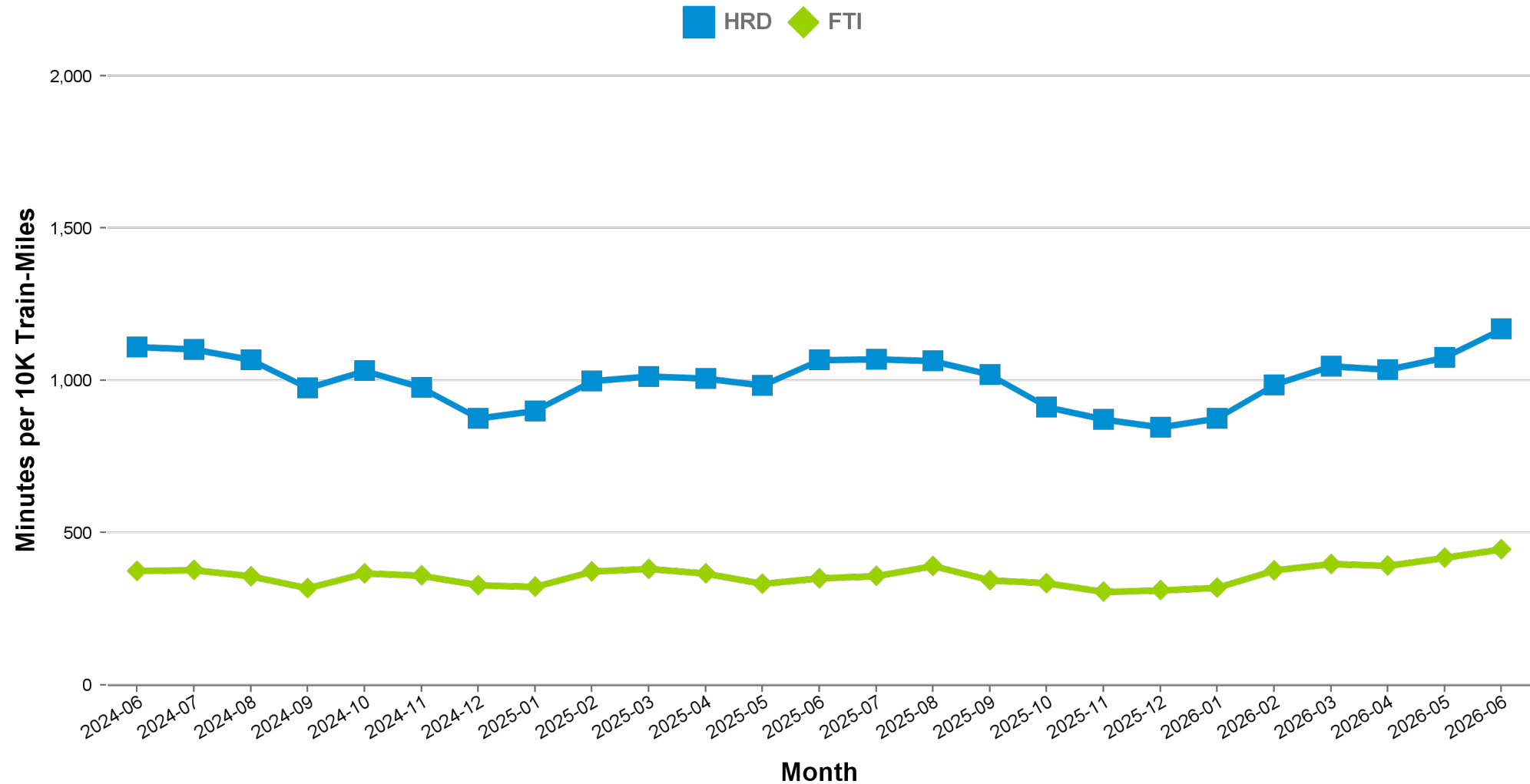
Total delay minutes per 10,000 train-miles attributable to freight train interference (FTI) incurred by Amtrak trains on each of the six major host railroads for the most recent two years.



Aggregated Host Railroad Performance Trend

2 Year Snapshot

Total host-responsible delay (HRD) and freight interference (FTI) minutes per 10,000 train-miles incurred by Amtrak trains, aggregated for the six major host railroads for the most recent two years.



Minutes of Delay per 10K Train Miles by Host for June 2026

RPA-5-D-000001, FD 36873

Host	Service	Total Host Responsible Delays		Largest Two Delay Categories - Current Month				Route Miles
		Current Month	Most Recent 12 Months	#1		#2		
Target		900	900					
BNSF	California Zephyr	1109	853	FTI	421	DSR	302	1027
	Carl Sandburg / Illinois Zephyr	959	803	FTI	450	CTI	141	257
	Cascades	1166	1045	FTI	333	PTI	278	317
	Coast Starlight	948	995	FTI	363	PTI	215	158
	Empire Builder	1266	885	FTI	800	DSR	270	2147
	Gold Runner	1130	1132	PTI	467	FTI	356	284
	Heartland Flyer	1619	1930	DSR	809	FTI	729	236
	Pacific Surfliner	854	1165	FTI	291	DCS	230	22
	Southwest Chief	1028	930	FTI	469	DSR	250	2206
	Sunset Ltd	893	1096	DSR	628	DCS	99	190
	Texas Eagle	1538	1691	FTI	890	DSR	450	116
CN-IC	Blue Water	2416	1278	DSR	1761	FTI	571	159
	City Of New Orleans	1655	1231	DSR	581	FTI	506	930
	Illini / Saluki	1062	906	DSR	457	FTI	349	304
	Lincoln / Missouri	2323	2680	FTI	1030	DSR	685	35
	Lincoln Service	2554	2158	FTI	1824	DSR	300	35
	Texas Eagle	1876	2342	FTI	1327	RTE	194	35
	Wolverine	3882	3331	DSR	2926	FTI	582	27
CPKC	Adirondack	1213	1041	PTI	672	DCS	292	178
	Borealis	808	849	DSR	248	FTI	208	376
	Empire Builder	955	797	DSR	345	FTI	208	384
	Ethan Allen Express	1111	1825	PTI	658	RTE	169	60
	Hiawatha	122	171	DCS	39	PTI	27	53
CSX	Auto Train	1101	1132	FTI	430	PTI	229	898
	Cardinal	988	801	FTI	530	DSR	262	703
	Carolinian	1599	1635	FTI	490	PTI	437	295
	Downeaster	608	670	PTI	326	DCS	155	107
	Floridian	1162	1011	FTI	324	DSR	257	1413
	Lake Shore Ltd	820	785	FTI	492	DSR	109	741
	Maple Leaf	1134	812	FTI	698	DSR	205	298
	Mardi Gras Service	3357	2347	FTI	1825	PTI	684	137
	New York - Niagara Falls	976	719	FTI	538	DSR	180	296
	Palmetto	950	947	FTI	466	PTI	198	659
	Pere Marquette	490	362	DSR	266	DCS	107	135
	Richmond / Newport News / Norfolk	1468	1134	FTI	337	CTI	260	189
	Silver Meteor	814	784	FTI	288	DSR	194	1152
NS	Blue Water	3098	2179	FTI	2481	PTI	274	39
	Cardinal	1400	1285	PTI	744	DSR	190	79
	Carolinian	899	635	PTI	354	DSR	303	202
	Crescent	1338	940	FTI	697	DSR	209	1141
	Floridian	1498	1019	FTI	779	PTI	248	518
	Lake Shore Ltd	1536	1048	FTI	1024	PTI	256	339
	Pennsylvanian	1078	735	DSR	404	FTI	372	249
	Pere Marquette	2499	1669	FTI	1827	PTI	478	39
	Piedmont	1025	664	DSR	347	PTI	288	173
	Richmond / Newport News / Norfolk	432	386	FTI	109	RTE	91	81
	Roanoke	784	546	PTI	230	FTI	203	216
	Wolverine	2723	2040	FTI	1963	PTI	205	39
UP	California Zephyr	924	847	FTI	333	DSR	265	1381
	Capitol Corridor	783	715	PTI	386	DCS	96	171
	Cascades	1719	1503	DSR	629	FTI	513	125
	Coast Starlight	1285	1271	DSR	360	PTI	289	1162
	Gold Runner	1568	1247	PTI	569	DSR	379	88
	Lincoln / Missouri	1011	909	FTI	330	PTI	304	502
	Lincoln Service	1044	978	FTI	376	PTI	346	231
	Missouri	982	819	FTI	415	DSR	222	271
	Pacific Surfliner	1420	1132	PTI	959	DCS	341	174
	Sunset Ltd	1283	1172	FTI	777	RTE	193	1784
	Texas Eagle	1381	1346	FTI	704	DSR	329	1073



Minutes of Delay per 10K Train Miles by Host for June 2026

Host	Service	Total Host Responsible Delays		Largest Two Delay Categories - Current Month				Route Miles
		Current Month	Most Recent 12 Months	#1		#2		
Target		900	900					
Amtrak	Adirondack	531	423	PTI	233	DSR	89	100
	Blue Water	388	284	PTI	175	DSR	121	99
	Ethan Allen Express	749	489	PTI	337	DSR	124	100
	Maple Leaf	581	499	PTI	166	RTE	145	109
	New York - Albany	405	388	PTI	147	DSR	83	81
	New York - Niagara Falls	410	398	PTI	130	DCS	102	109
	Wolverine	245	419	PTI	165	DCS	36	99
BBrRR	Cardinal	3304	1603	DSR	1673	PTI	1180	132
CN-Canada	Adirondack	2782	2926	FTI	1029	RTE	736	49
Fla DOT	Floridian	985	1154	CTI	436	PTI	262	70
	Silver Meteor	756	1285	CTI	589	RTE	72	70
FR	Auto Train	7188	4189	CTI	3487	DCS	1431	16
	Floridian	3064	2436	CTI	1085	DSR	780	61
	Silver Meteor	2379	2211	CTI	843	DSR	574	61
MADOT	Springfield Shuttles	265	268	FTI	144	DCS	47	36
	Vermonter	777	327	DCS	367	DSR	241	50
MBTA	Downeaster	514	689	DCS	203	PTI	145	38
Metra	Borealis	1020	1341	CTI	305	DSR	254	33
	Empire Builder	2298	2330	CTI	1522	DMW	274	29
	Hiawatha	1975	1969	CTI	1020	DSR	287	29
MIDOT	Blue Water	1045	372	PTI	833	DSR	106	22
	Wolverine	1124	736	PTI	622	DSR	420	134
MNRR	Acela	2395	1681	DSR	1328	CTI	520	56
	Adirondack	1612	1234	CTI	1033	DSR	228	64
	Ethan Allen Express	3485	1821	CTI	1860	RTE	918	64
	Lake Shore Ltd	1298	1193	CTI	748	RTE	304	64
	Maple Leaf	2229	1339	CTI	1803	RTE	293	64
	New York - Albany	1414	1018	CTI	823	DSR	192	64
	New York - Niagara Falls	2033	1200	CTI	999	DMW	587	64
	Richmond / Newport News / Norfolk	2452	1653	DSR	1190	CTI	593	56
	Vermonter	3823	2452	DSR	1777	CTI	1592	56
NECR	Vermonter	954	728	DSR	717	DMW	105	192
NMDOT	Southwest Chief	2445	2007	CTI	1820	PTI	471	80
SCRRA	Coast Starlight	1665	1612	PTI	968	CTI	568	48
	Pacific Surfliner	1134	975	CTI	445	PTI	421	95
SDNRR	Pacific Surfliner	1493	1209	CTI	460	PTI	426	60
Sunder	Cascades	951	1013	PTI	648	CTI	196	20
	Coast Starlight	1933	2501	PTI	1008	CTI	900	20
TRE	Texas Eagle	2340	1048	CTI	1505	RTE	466	33
VTR	Ethan Allen Express	676	924	DSR	576	DCS	73	91

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Excludes hosts with fewer than 15 route miles.
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Northeast Regional: Roanoke includes all trains between Roanoke and points on the NEC; Richmond / Newport News / Norfolk includes all trains between these locations and points on the NEC.



Minutes of Delay per 10K Train Miles by Service for June 2026

Service		Host	Total Host Responsible Delays		Largest Two Delay Categories - Current Month				Route Miles
			Current	Most	#1		#2		
Target			900	900					
Acela									
Acela		MNRR	2395	1681	DSR	1328	CTI	520	56
All Other NEC Corridor Routes									
Northeast Regional	Richmond / Newport News / Norfolk	CSX	1468	1134	FTI	337	CTI	260	189
		NS	432	386	FTI	109	RTE	91	81
		MNRR	2452	1653	DSR	1190	CTI	593	56
	Roanoke	NS	784	546	PTI	230	FTI	203	216
	Springfield Shuttles	MADOT	265	268	FTI	144	DCS	47	36

Minutes of Delay per 10K Train Miles by Service for June 2026

Service		Host	Total Host Responsible Delays		Largest Two Delay Categories - Current Month				Route Miles
			Current	Most	#1		#2		
Target			900	900					
Non-NEC Corridor Routes									
Borealis		CPKC	808	849	DSR	248	FTI	208	376
		Metra	1020	1341	CTI	305	DSR	254	33
Capitol Corridor		UP	783	715	PTI	386	DCS	96	171
Carolinian		CSX	1599	1635	FTI	490	PTI	437	295
		NS	899	635	PTI	354	DSR	303	202
Cascades		BNSF	1166	1045	FTI	333	PTI	278	317
		UP	1719	1503	DSR	629	FTI	513	125
		Sounder	951	1013	PTI	648	CTI	196	20
Downeaster		CSX	608	670	PTI	326	DCS	155	107
		MBTA	514	689	DCS	203	PTI	145	38
Empire	Adirondack	CPKC	1213	1041	PTI	672	DCS	292	178
		Amtrak	531	423	PTI	233	DSR	89	100
		CN-Canada	2782	2926	FTI	1029	RTE	736	49
		MNRR	1612	1234	CTI	1033	DSR	228	64
	Ethan Allen Express	CPKC	1111	1825	PTI	658	RTE	169	60
		Amtrak	749	489	PTI	337	DSR	124	100
		MNRR	3485	1821	CTI	1860	RTE	918	64
		VTR	676	924	DSR	576	DCS	73	91
	Maple Leaf	CSX	1134	812	FTI	698	DSR	205	298
		Amtrak	581	499	PTI	166	RTE	145	109
		MNRR	2229	1339	CTI	1803	RTE	293	64
	New York - Albany	Amtrak	405	388	PTI	147	DSR	83	81
		MNRR	1414	1018	CTI	823	DSR	192	64
	New York - Niagara Falls	CSX	976	719	FTI	538	DSR	180	296
		Amtrak	410	398	PTI	130	DCS	102	109
		MNRR	2033	1200	CTI	999	DMW	587	64
Gold Runner		BNSF	1130	1132	PTI	467	FTI	356	284
		UP	1568	1247	PTI	569	DSR	379	88
Heartland Flyer		BNSF	1619	1930	DSR	809	FTI	729	236
Hiawatha		CPKC	122	171	DCS	39	PTI	27	53
		Metra	1975	1969	CTI	1020	DSR	287	29
Illinois	Carl Sandburg / Illinois Zephyr	BNSF	959	803	FTI	450	CTI	141	257
	Illini / Saluki	CN-IC	1062	906	DSR	457	FTI	349	304
	Lincoln Service	CN-IC	2554	2158	FTI	1824	DSR	300	35
		UP	1044	978	FTI	376	PTI	346	231
Lincoln / Missouri		CN-IC	2323	2680	FTI	1030	DSR	685	35
		UP	1011	909	FTI	330	PTI	304	502
Mardi Gras Service		CSX	3357	2347	FTI	1825	PTI	684	137
Michigan	Blue Water	CN-IC	2416	1278	DSR	1761	FTI	571	159
		NS	3098	2179	FTI	2481	PTI	274	39
		Amtrak	388	284	PTI	175	DSR	121	99
		MIDOT	1045	372	PTI	833	DSR	106	22
	Pere Marquette	CSX	490	362	DSR	266	DCS	107	135
		NS	2499	1669	FTI	1827	PTI	478	39
	Wolverine	CN-IC	3882	3331	DSR	2926	FTI	582	27
		NS	2723	2040	FTI	1963	PTI	205	39
		Amtrak	245	419	PTI	165	DCS	36	99
		MIDOT	1124	736	PTI	622	DSR	420	134
Missouri		UP	982	819	FTI	415	DSR	222	271
Pacific Surfliner		BNSF	854	1165	FTI	291	DCS	230	22
		UP	1420	1132	PTI	959	DCS	341	174
		SCRRA	1134	975	CTI	445	PTI	421	95
		SDNRR	1493	1209	CTI	460	PTI	426	60
Pennsylvanian		NS	1078	735	DSR	404	FTI	372	249
Piedmont		NS	1025	664	DSR	347	PTI	288	173
Vermont		MADOT	777	327	DCS	367	DSR	241	50
		MNRR	3823	2452	DSR	1777	CTI	1592	56
		NECR	954	728	DSR	717	DMW	105	192

Minutes of Delay per 10K Train Miles by Service for June 2026

Service		Host	Total Host Responsible Delays		Largest Two Delay Categories - Current Month				Route Miles
			Current	Most	#1		#2		
Target			900	900					
Long-Distance Routes									
Auto Train		CSX	1101	1132	FTI	430	PTI	229	898
		FR	7188	4189	CTI	3487	DCS	1431	16
California Zephyr		BNSF	1109	853	FTI	421	DSR	302	1027
		UP	924	847	FTI	333	DSR	265	1381
Cardinal		CSX	988	801	FTI	530	DSR	262	703
		NS	1400	1285	PTI	744	DSR	190	79
		BBrRR	3304	1603	DSR	1673	PTI	1180	132
City Of New Orleans		CN-IC	1655	1231	DSR	581	FTI	506	930
Coast Starlight		BNSF	948	995	FTI	363	PTI	215	158
		UP	1285	1271	DSR	360	PTI	289	1162
		SCRRA	1665	1612	PTI	968	CTI	568	48
		Sounder	1933	2501	PTI	1008	CTI	900	20
Crescent		NS	1338	940	FTI	697	DSR	209	1141
Empire Builder		BNSF	1266	885	FTI	800	DSR	270	2147
		CPKC	955	797	DSR	345	FTI	208	384
		Metra	2298	2330	CTI	1522	DMW	274	29
Floridian		CSX	1162	1011	FTI	324	DSR	257	1413
		NS	1498	1019	FTI	779	PTI	248	518
		Fla DOT	985	1154	CTI	436	PTI	262	70
		FR	3064	2436	CTI	1085	DSR	780	61
Lake Shore Ltd		CSX	820	785	FTI	492	DSR	109	741
		NS	1536	1048	FTI	1024	PTI	256	339
		MNRR	1298	1193	CTI	748	RTE	304	64
Palmetto		CSX	950	947	FTI	466	PTI	198	659
Silver Meteor		CSX	814	784	FTI	288	DSR	194	1152
		Fla DOT	756	1285	CTI	589	RTE	72	70
		FR	2379	2211	CTI	843	DSR	574	61
Southwest Chief		BNSF	1028	930	FTI	469	DSR	250	2206
		NMDOT	2445	2007	CTI	1820	PTI	471	80
Sunset Ltd		BNSF	893	1096	DSR	628	DCS	99	190
		UP	1283	1172	FTI	777	RTE	193	1784
Texas Eagle		BNSF	1538	1691	FTI	890	DSR	450	116
		CN-IC	1876	2342	FTI	1327	RTE	194	35
		UP	1381	1346	FTI	704	DSR	329	1073
		TRE	2340	1048	CTI	1505	RTE	466	33

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Service	All-Stations OTP		Customer OTP		Avg Mins Late per Late Rider**	
	Current Month	Most Recent 12 Months	Current Month	Most Recent 12 Months	Current Month	Most Recent 12 Months
Amtrak System	71.4%	75.7%	70.1%	75.5%	61	55
NEC Corridor Routes	81.3%	81.7%	76.6%	79.1%	45	44
Minimum Standard			80.0%	80.0%		
Acela*	82.7%	78.7%	77.4%	76.2%	42	43
Keystone	94.6%	91.8%	93.2%	90.5%	27	35
Northeast Regional	76.1%	78.9%	72.8%	77.2%	47	44
On Spine Northeast Regional	80.2%	80.4%	78.0%	79.2%	47	44
Richmond / Newport News / Norfolk	67.0%	75.1%	61.2%	72.4%	47	43
Roanoke	79.9%	81.4%	77.2%	79.7%	50	49
Springfield Shuttles	80.7%	80.7%	76.7%	85.8%	38	38
Non-NEC Corridor Routes	76.5%	79.9%	70.8%	76.7%	45	45
Minimum Standard			80.0%	80.0%		
Borealis	87.2%	78.1%	83.7%	71.5%	65	51
Capitol Corridor	88.8%	89.3%	85.7%	87.2%	38	36
Carolinian	49.2%	65.6%	39.2%	63.3%	58	50
Cascades	72.9%	77.3%	64.5%	72.6%	40	41
Downeaster	93.4%	89.8%	89.8%	87.6%	40	36
Empire	71.9%	76.3%	65.8%	74.6%	39	43
Adirondack	74.2%	71.7%	72.9%	62.6%	51	48
Berkshire Flyer	70.8%	57.0%	72.8%	54.5%	68	68
Ethan Allen Express	51.1%	68.1%	33.4%	61.2%	40	42
Maple Leaf	53.2%	59.5%	52.1%	58.0%	50	51
New York - Albany	84.8%	85.1%	75.7%	82.2%	33	38
New York - Niagara Falls	73.9%	81.0%	65.9%	78.2%	36	42
Gold Runner	61.5%	66.5%	55.7%	60.9%	52	49
Heartland Flyer	66.9%	63.9%	67.8%	56.7%	49	45
Hiawatha	91.6%	90.5%	88.7%	88.0%	44	40
Illinois	71.5%	75.6%	66.2%	73.0%	43	44
Carl Sandburg / Illinois Zephyr	70.3%	75.8%	68.7%	74.3%	43	41
Illini / Saluki	71.0%	80.2%	65.6%	77.5%	42	43
Lincoln Service	72.8%	71.8%	65.7%	69.4%	44	45
Lincoln / Missouri	45.3%	54.0%	35.7%	49.6%	57	49
Mardi Gras Service	72.1%	88.9%	55.7%	80.8%	46	44
Michigan	62.6%	69.5%	57.5%	67.4%	60	53
Blue Water	48.6%	70.0%	30.7%	62.9%	61	55
Pere Marquette	76.1%	82.9%	74.1%	80.8%	51	52
Wolverine	65.0%	67.5%	63.6%	66.3%	61	53
Missouri	73.9%	78.4%	70.7%	75.8%	38	41
Pacific Surfliner	83.9%	86.2%	80.2%	84.5%	38	44
Pennsylvanian	73.8%	78.9%	73.9%	80.9%	42	51
Piedmont	75.1%	82.5%	65.9%	75.9%	41	37
Vermonteer	64.0%	73.5%	59.2%	71.8%	49	40
Long-Distance Routes	38.2%	53.2%	40.1%	57.0%	112	95
Minimum Standard			80.0%	80.0%		
Auto Train	72.5%	78.5%	58.4%	66.3%	95	83
California Zephyr	37.2%	57.0%	39.7%	59.0%	127	116
Cardinal	27.3%	51.3%	28.9%	53.4%	102	84
City Of New Orleans	29.4%	57.7%	30.2%	69.1%	121	81
Coast Starlight	55.9%	61.8%	55.2%	65.9%	67	78
Crescent	50.1%	69.4%	55.0%	72.2%	92	69
Empire Builder	31.2%	47.4%	29.2%	49.6%	151	131
Floridian	10.5%	31.5%	5.4%	32.2%	158	105
Lake Shore Ltd	59.3%	65.9%	62.6%	70.2%	61	73
Palmetto	59.3%	71.4%	48.1%	71.6%	59	51
Silver Meteor	42.7%	58.0%	37.3%	57.4%	77	72
Southwest Chief	16.9%	33.3%	15.8%	30.8%	125	117
Sunset Ltd	39.6%	54.1%	47.3%	63.2%	84	89
Texas Eagle	52.2%	51.9%	58.7%	57.2%	100	87

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* Acela on-time performance target is 90.0%
** Excludes on-time Customers



Host Railroad Responsible Delays

Code	Code Description	Explanation
CTI	Commuter Train Interference	Delays for meeting or following commuter trains
DCS	Signal Delays	Signal failure or All Other signal delays, wayside defect-detector false-alarms, defective road crossing protection, efficiency tests, drawbridge stuck open
DMW	Maintenance of Way	Maintenance of Way delays including holds for track repairs or MW foreman to clear
DSR	Slow Order Delays	Temporary slow orders, except heat or cold orders
DTR	Detour	Delays from detours
FTI	Freight Train Interference	Delays from freight trains
PTI	Passenger Train Interference	Delays for meeting or following All Other passenger trains
RTE	Routing	Routing-dispatching delays including diversions, late track bulletins, etc.

Amtrak Responsible Delays

Code	Code Description	Explanation
ADA	Passenger Related	All delays related to disabled passengers, wheel chair lifts, guide dogs, etc.
CAR	Car Failure	Mechanical failure on all types of cars
CCR	Cab Car Failure	Mechanical failure on Cab Cars
CON	Hold for Connection	Holding for connections from All Other trains or buses.
ENG	Locomotive Failure	Mechanical failure on engines.
HLD	Passenger Related	All delays related to passengers, checked-baggage, large groups, etc.
INJ	Injury Delay	Delay due to injured passengers or employees.
ITI	Initial Terminal Delay	Delay at initial terminal due to late arriving inbound trains causing late release of equipment.
OTH	Miscellaneous Delays	Lost-on-run, heavy trains, unable to make normal speed, etc.
SVS	Servicing	All switching and servicing delays
SYS	Crew & System	Delays related to crews including lateness, lone-engineer delays

Third-Party Delays

Code	Code Description	Explanation
CUI	Customs	U.S. and Canadian customs delays; Immigration-related delays
DBS	Debris	Debris strikes
MBO	Drawbridge Openings	Movable bridge openings for marine traffic where no bridge failure is involved
NOD	Unused Recovery Time	Wait for departure time
POL	Police-Related	Police/fire department holds on right-of-way or on-board trains
TRS	Trespassers	Trespasser incidents including road crossing accidents, trespasser / animal strikes, vehicle stuck on track ahead, bridge strikes
WTR	Weather-Related	All weather-related delays including floods/washouts, earthquake-related delays, heat or cold orders, slippery rail due to leaves

*These delay codes are applicable to Off-NEC routes only.