312893

Civil Design Incorporated
5220 Oakland Avenue
St. Louis, MO 63110

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

October 5, 2026

Surface Transportation Board
Office of Economics
395 E Street SW
Washington, DC 20423-0001

Subject: Application for Receipt of the Confidential Railroad Waybill Sample Data

Attention: Office of Economics, Surface Transportation Board

The Illinois Soybean Association, ISA, has selected and contracted with Civil Design Inc., (CDI) to examine the movement of soybeans, corn and wheat from Illinois farms to processing and storage facilities, as well as potential export locations. Soybeans, corn and wheat are often rotating crops on the same Illinois farms to preserve soil nutrients and physical characteristics. Transportation facilities and infrastructure often serves each product at different times and seasons. Illinois has 43,000 farmers supporting the ISA, with as many as 200,000 full time jobs associated with soybean production, transportation and processing.

As much as 65% of soybeans grown in Illinois, the largest single state soybean producer, are exported. Current production and the forecast growth through the year 2050 for each of the three products has created, and will increase, demands on the state and national transportation network in getting crops to market.

Soybeans, in ways that are similar for corn and wheat, are sought on in the international marketplace due to it's higher quality. Each of the three products has a moisture content target that preserves its key characteristics, currently 13% for soybeans. Illinois soybeans avoid stress attributes with reduced handling in getting to market. Many soybeans from Brazil, with its tropical climate, are dried by wood fires. The heating element skin temperatures have the potential to scorch the beans. The resulting bruising and surface heat degrade the amino acid profile, reducing the energy, vitamins and minerals sought for animal and human diets.

The current goods movement project will build upon the first three efforts undertaken by the study team for the ISA:

- Soybean movement from the farm to elevators, processing facilities and transshipment locations across Illinois,
- Soybean movement from across Illinois to international markets,
- Preliminary evaluation of current and projected soybean, corn and wheat product volumes, identified by the US Department of Agriculture crop reporting district (CRD), while moving across existing and planned transportation infrastructure.

The current effort will examine all three complementary products, including transportation to other agriculture commercial facilities, e.g., food processing plants, impacted by the Illinois and national transportation infrastructure capacity, operations and conditions. The team is assembling the existing and future plans and projects, as well as identifying agriculture and transportation trends to track over time as the 2050 project horizon is approached.

The United States Class 1, 2 and 3 railroads are a critical component for the present and future movement of soybeans, corn and wheat to domestic and export markets from Illinois farm fields.

The ISA request presented by CDI is being prepared in accordance with paragraphs (b)(4) and (c) of CFR Title 49, Volume 9, Part 1244.9, that identifies the content of a request for the release of railroad waybill sample information. We are including the following three categories of information: purpose for which the requested data are needed, description of the specific waybill data or fields required, and justification as to why the specified waybill data are needed.

1) A complete and detailed explanation of the purpose for which the requested data are needed.

ISA's Chief Executive Officer recently reiterated the importance of the link between agriculture and transportation, "Our railways and highways connect farms, elevators, processors and ports". Illinois and other US grown soybeans currently enjoy an approximate 15% advantage in the landed cost to international market locations when compared to other export origins. A significant portion of the advantage arises from the greater efficiency and lower cost of domestic US transportation. Freight costs make up just 10% to 15% of the value of U.S. soy compared to 30% of the value of Brazilian shipped soybean products. Preserving the delivered cost advantage is critical as the forecasted growth in Illinois soybean production. The Confidential Waybill Sample is an essential element of the overall transportation picture for moving agriculture products to market. It is part of the information base, and a source of information for developing statewide multi-modal, agriculture transportation plans.

The Illinois transportation network ensures the soybean, corn and wheat quality and cost structure is preserved through the supply chain from the farm gate to the end user. And it's as true for conventionally grown beans as it is for non-GMO beans, as well as other types of value-added soybeans that can be placed on a container directly on the farm and shipped to their final destination. (source: ISA Market Development)

2) A description of the specific waybill data or fields actually required (including pertinent geographic areas).

The project study for soybean, corn and wheat moving from Illinois farms to domestic and international markets seeks to include the railroad transportation mode as well as roadway and waterway modes. The enclosed table, Table 1: Surface Transportation Board (STB) BEA Codes from Table 4-4, and BEA County Listing from Table 4-5, identifies the origin geographies. Further,

some soybean, corn and wheat volumes may enter and be destined for Illinois to reach select processing facilities. The rail mode portion of the study seeks to identify the movement to coastal ports and processing facilities as they may exist.

The study focus is on soybeans, corn and wheat, including processed and partially-processed soybean, corn and wheat products that are shipped by rail. The enclosed table, Table 2: Agricultural Product Movement, presents the STCC codes for soybean, corn and wheat products that may move by rail.

3) A detailed justification as to why the specified waybill data are needed

In a recent study the ISA identified that Illinois hosts 145,708 miles of roadways, 6,986 miles of rail lines, 2,185 miles of interstate roadway, 77 rail shuttle facilities and 62 river-located elevators. Illinois' transportation costs are also highly competitive. Roadways and waterways have procedures in place to capture freight traffic volumes moving across their respective modal systems.

Class I railroads in the United States, as well as North America, play a significant role in moving soybeans, corn and wheat, as well as other bulk and processed agricultural products, to market. Illinois, hosting the greater Chicago area rail hub, is at the center of this freight rail network. The changing rail networks of the 1970s were augmented by the mergers that took place through 1996: Burlington Northern and Sante Fe, Union Pacific and Southern Pacific railroads. These overlapping circle types of mergers and service area alignments were complemented by the network extension mergers / acquisitions of the Illinois Central by the Canadian National in 1999 and the Kansas City Southern by the Canadian Pacific in 2023 railroads / railways.

These tectonic shifts in service area coverage and market access for soybeans, corn and wheat in Illinois have prompted the ISA to track the effects on their 43,000 Illinois members. CDI is assisting in this assessment, including the proposed Union Pacific and Norfolk Southern merger. The STB Confidential Waybill Sample provides the information essential to examining freight rail service and transportation access to market facilities and ports.

The use of waybill data is recognized in 49 C.F.R. §§ 1244.1 to 1244.5 to have wide ranging use in an evaluation of railroad freight movement activity, productivity studies, exemption decisions, and analyses assessing decisions before the STB. Waybill data are also used by transportation practitioners and consultants in evaluating the impacts from formal proceedings before the STB.

Because the Waybill Sample contains sensitive shipping and revenue information, access is restricted. The rules for release of waybill data are codified at 49 C.F.R. § 1244.9. The rules identify five classes of users. After careful consideration, CDI is submitting the application on behalf of the ISA in the following category:

#4: Transportation practitioners, consulting firms, and law firms in specific proceedings

The ISA seeks to develop a more detailed understanding of the rail freight network.

Team Members

The project team lead is responsible for maintaining the integrity and confidentiality of the data being provided by the STB. The entire team is aware of the importance of maintaining the data confidentiality throughout the project. The original data and any copies will be returned to the STB at the conclusion of the project in accordance with the confidentiality agreement.

Dr. J. Lee Hutchins, Jr. PE, the project team lead, began his career in transportation infrastructure and land use at Washington University – St. Louis. His dissertation examined the joint public and private sector nature of regional railroad reuse and reconfiguration. He focused on goods movement and industrial facilities while working for a third-party bulk storage and handling company with more than thirty facilities across the globe, including joint venture management and development. Lee continues to work with transportation and industrial companies for goods movement through individual facilities and proprietary networks across the United States and overseas. He has worked with regional planning agencies in St. Louis and Memphis, as well as city, state and port agencies in Illinois, Wisconsin and Minnesota. Lee has worked with private sector industrial and transportation firms across these global geographies. During his ten years working with GATX Terminals he managed two joint ventures in Europe. Lee has led two previous regional freight studies in the St. Louis and Memphis regions that made use of the STB's Confidential Railroad Waybill Sample.

The CDI team, in performing the project work for the ISA, appreciates the STB's review of this application for the release of the requested Confidential Railroad Waybill Sample. Please contact Dr. Lee Hutchins at (708) 267-5707 if we can provide any further details.

Very truly yours,

/s/ J. Lee Hutchins, Jr.

Dr. J. Lee Hutchins, Jr., PE.
Senior Technical Consultant
Civil Design Incorporated
Mobile: (708) 267-5707
Remote email: jost.tram@gmail.com
Office email: lhutchins@civildesigninc.com

Table 1: Surface Transportation Board (STB) BEA Codes from Table 4-4, and BEA County Listing from Table 4-5

064 Chicago-Gary-Kenosha, IL-IN-WI

- Counties: LIVINGSTON IL, MCHENRY IL, MCLEAN IL, OGLE IL, PUTNAM IL, STEPHENSON IL, WILL IL, WINNEBAGO IL

067 Indianapolis, IN-IL

- Counties: CLARK IL

068 Champaign-Urbana, IL

- Counties: CHAMPAIGN IL, CLAY IL, COLES IL, CUMBERLAND IL, DOUGLAS IL, EDGAR IL, EFFINGHAM IL, FAYETTE IL, FORD IL, JASPER IL, MACON IL, MOULTRIE IL, PIATT IL, SHELBY IL, VERMILION IL

069 Evansville-Henderson, IN-KY-IL

- Counties: CRAWFORD IL, EDWARDS IL, LAWRENCE IL, WABASH IL, WAYNE IL, WHITE IL

072 Paducah, KY-IL

- Counties: MASSAC IL

096 St. Louis, MO-IL

- Counties: CLINTON IL, FRANKLIN IL, GALLATIN IL, HAMILTON IL, HARDIN IL, JACKSON IL, JEFFERSON IL, JERSEY IL, JOHNSON IL, MACOUPIN IL, MADISON IL, MARION IL, MONROE IL, PERRY IL, POPE IL, PULASKI IL, RANDOLPH IL, SALINE IL, ST CLAIR IL, UNION IL, WASHINGTON IL, WILLIAMSON IL

097 Springfield, IL-MO

- Counties: ADAMS IL, BROWN IL, CASS IL, CHRISTIAN IL, GREENE IL, LOGAN IL, MENARD IL, MONTGOMERY IL, MORGAN IL, PIKE IL, SANGAMON IL, SCHUYLER IL, SCOTT IL

100 Des Moines, IA-IL-MO

- Counties: HANCOCK IL, HENDERSON IL

101 Peoria-Pekin, IL

- Counties: FULTON IL, KNOX IL, MARSHALL IL, MASON IL, MCDONOUGH IL, PEORIA IL, STARK IL, TAZEWELL IL, WARREN IL, WOODFORD IL

102 Davenport-Moline-Rock Island, IA-IL

- Counties: HENRY IL, MERCER IL, ROCK ISLAND IL, WHITESIDE IL

104 Madison, WI-IL-IA

- Counties: JO DAVIESS IL

End of Table 1

Table 2 Agricultural Product Movement

Wheat		Soybeans		Corn	
STCC Code	Product Name	STCC Code	Product Name	STCC Code	Product Name
113670	EGYPTIAN WHEAT	114410	SOYBEANS,DRIED	113210	CORN MAIZE EAR
113710	WHEAT	114411	SOYBEANS, DRIED	113211	CORN MAIZE EAR ORGANIC
113715	WHEAT ORGNC	114415	SOYABEANS FRESH	113215	CORN MAIZE SHELLED
113720	DURUM WHEAT	114416	SOYABEANS ORGANIC	113216	CORN SHELLED
2041960	WHEAT MEAL	114420	SOYBEAN SCRNGS	113225	CORN ORGANIC BULK
2041962	WHEAT FLOUR	114425	SOYABEANS ORGANIC	113231	CORN
2041972	WHEAT GERM	2092110	OYBEAN OIL	113240	CORN SHELLED DRY AG
2041985	WHEAT	2092310	SOYBEAN ALBUMEN	113250	CORN MAIZE GENMOD
2041220	WHEAT BRAN	2092314	SOYBEN OIL MEAL	113255	CORN, MAIZE, MODIFIED
2041290	WHEAT GRAIN FEED			115972	SEED CORN
2041931	WHEAT GERM MEAL			119910	BROOM CORN
2041110	FLOUR,WHEAT			2034252	SWEET CORN,DRIED
				2041312	CORN MEAL, EDIBLE
				2041315	CORN MEAL
				2041320	CORN FLOUR
				2041330	CORN MEAL OR FLOUR
				2041952	CORN,CRUSHED
				2041953	CORN RLD HLD
				2046210	CORN STARCH
				2046215	CORN STARCH LIQUID
				2046310	CORN SUGAR
				2046315	CORN SUGAR
				2046510	CORN OIL
				2093347	CORN OIL
				2093348	CORN OIL
				2093349	CORN OIL