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BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. NOR 42175

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March 26, 2024
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COMPLAINT AND PETITION OF THE NATIONAL RAILROAD PASSENGER CORP.
UNDER 49 U.S.C. § 24308(f) FOR SUBSTANDARD PERFORMANCE OF
AMTRAK'S SUNSET LIMITED TRAINS 1 AND 2

**UNION PACIFIC RAILROAD COMPANY'S
REQUEST FOR EXTENSION OF TIME**

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Pursuant to 49 C.F.R. § 1104.7, Union Pacific Railroad Company respectfully requests a 90-day extension of the time established by the Board's February 13, 2024, decision in this proceeding to provide narrative explanations of the root causes of the "Host-Responsible Delays on a Run-by-Run Basis" listed in Part I of the Decision's Appendix.

Good cause exists to grant the extension. Union Pacific has been working diligently to provide the large quantity of information requested by the Board. Union Pacific is not seeking an extension of time to respond to the Board's questions in the "II. Host-Responsible Delays—Focused Questions: Slow Orders by Subdivision" section of the Decision, its questions in the "IV. Site-and Party-Specific Questions" section of the Decision; or its request for narrative explanations of the root causes of the "Select Host-Responsible Delays of 90 Minutes or More" listed in Part I of the Decision's Appendix. Union Pacific will provide its responses to those parts of the Decision on April 15, 2023. Union Pacific is seeking additional time only because it will be impossible to address the root causes of host-responsible delays identified in Part I of the Decision's Appendix by April 15.

Developing “narrative explanations of the root causes” of specific delays to *Sunset Limited* trains is a time-consuming and resource-intensive process. Amtrak’s delay reports can provide clues by identifying situations in which *Sunset Limited* trains met or followed freight trains and, occasionally, reporting information obtained by monitoring radio communications by dispatchers. However, Amtrak’s reports typically do not address the root causes of a delay (*e.g., why* a meet occurred where it did, or *why* the *Sunset Limited* was following a freight train). See Decision at 3 (“Examples of the explanation of root cause(s) of delay(s) may include a detailed explanation of a dispatching decision, the chain of events leading to a particular delay, intervening events, and any other relevant piece of information that will illustrate the underlying reason for a delay to an Amtrak train.”).

Understanding and explaining the root causes of delays requires an analysis of the circumstances surrounding each delay. The analysis takes a considerable amount of time, especially regarding delays that occurred years ago. The root causes analyses require Union Pacific to mine an extraordinarily large amount of data. For example, Union Pacific collects and retains data granular enough to identify requests to line signals, how signals were lined, and when trains passed control points. It collects and retains information regarding incidents that impacted locomotives, rail cars, tracks, sidings, signals, and crew hours of service. In the days immediately following a particular event, this information is readily available. With the passage of time, however, compiling and connecting the data to ascertain the root cause of delays becomes much more difficult.

The process Union Pacific has developed to respond to the Board's request is time-consuming and almost entirely manual. In each case, Union Pacific begins with Amtrak's report of the delay. Union Pacific uses Amtrak's report and its own operating records to identify freight trains that interacted with the *Sunset Limited* train at the time of the reported delay, as well as other trains in the area at the time of the delay. Union Pacific then reviews records associated with those trains to determine whether they help to identify and explain the root cause of the delay. Often, information contained in train records points to other potential sources of information either directly (*i.e.*, through express notations in the records) or indirectly (*i.e.*, through train movement data that reveal unscheduled stops or through crew hours data), which prompts additional searches for other records—*e.g.*, records of mechanical incidents or other incidents—that help explain the root cause of the delay. In addition to reviewing records, Union Pacific consults with dispatching personnel who are familiar with the operations and territories at issue to understand the factors that would cause outcomes observed in train movement data, which can also prompt additional searches for records. Finally, Union Pacific reviews and analyzes raw data from its dispatching records when those granular data are needed to understand and explain the precise sequence events leading to a delay.

Union Pacific has already devoted substantial time and effort in responding to the Board's requests. Union Pacific focused first on the delays of 90 minutes or more listed in Part II of the Appendix to the Decision served February 13 because it believed that the causes of the longer delays would be more readily identifiable than those of the shorter delays included in list in Part I of the Appendix, and that working through the delays in Part II would help develop an approach to address the delays in Part I.

Union Pacific expects to complete the process of identifying the root causes of the delays in Part II—at least to the extent it is possible to identify the root causes—by April 15, 2024. Once Union Pacific completes the process of analyzing the root causes of the 43 delays in Part II attributed to Union Pacific, it will apply the same rigorous process to the 948 delays in Part I attributed to Union Pacific. Union Pacific is optimistic the time required to analyze the delays will grow shorter with experience and hopes some of the 948 delays will be related in ways that allow some grouping of events and explanations to reflect a common cause. *See* Decision at 2–3. Given its Part II experience, Union Pacific believes the Part I days will require an additional 90 days.

Accordingly, Union Pacific respectfully requests an extension of the deadline for providing explanations of the root causes of the “Host-Responsible Delays on a Run-by-Run Basis” listed in Part I of the Decision’s Appendix to July 15, 2024.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of March, 2024, I caused a copy of the foregoing document to be served by email on Administrative Law Judge McCarthy and all parties of record in Docket No. NOR 42175.

/s/ Michael L. Rosenthal