



National Grain and Feed Association

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VIA E-FILING

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

ENTERED
Office of Proceedings
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Public Record

Re: Docket No. EP 742, CSX Transportation Inc.'s Rail Service Issues

Dear Ms. Brown:

As referenced at page 6 of its written statement submitted today in this proceeding, the National Grain and Feed Association (NGFA) respectfully submits as Appendix A to this letter the list of additional rail service performance metrics that the NGFA recommends the Board should require from CSXT, for the reasons set out in the written statement.

The NGFA appreciates the Board's consideration of this request.

Respectfully submitted,

A handwritten signature in black ink that reads "Randall C. Gordon". The signature is fluid and cursive, with the first name being the most prominent.

Randall C. Gordon
President
National Grain and Feed Association

Appendix A

NGFA-Recommended Additional CSXT Service Performance Reporting Metrics

The National Grain and Feed Association (NGFA) herein recommends several additional rail service performance metrics that it believes the Board should require from CSXT to enable the STB and rail users to better track the carrier's efforts to restore service to acceptable levels.

1. Comparisons of Service Performance Metrics to Previous Years: The NGFA believes it is important that existing rail service performance metrics reported weekly by CSXT to the STB – as well as the additional metrics requested by the NGFA herein – be benchmarked against data for the same service-performance dating to at least 2014/15 to enable CSXT, the STB, and rail customers to be aware of how current service performance compares against previous norms.
2. The Performance Data Reporting (PDR) on Rail Service Issues available on the STB website is excellent; but some additional information would illustrate other service issues affecting CSXT rail customers. For instance, the PDR Origin Dwell Time metric is specific **only** to unit train shipments ("4. Weekly Average Dwell Time at Origin for Unit Train Shipments Measured in Hours"). But many CSXT customers no longer have access to unit train service and their efficiencies. Therefore, it would be useful to break out PDR by Unit Train, Express Unit Train, and Manifest Shipments, as "express loaders" are qualified to use CSXT locomotives while loading their trains.
 - **Manifest Service** (since many customers have been forced to use manifest service since they no longer are authorized as unit train loaders by CSXT), the following data should be required:
 - a. **Origin Customer (Industry) Dwell Time – Loaded Manifest Grain / Grain Product Cars.** Measured as elapsed time between Loaded Billing and Departure from Industry Facility (Customer).
 - b. **Destination Customer (Industry) Dwell Time – Empty Manifest Grain / Grain Product Cars.** Measured as elapsed time between Empty Released and Departure from Industry Facility (Customer).

- **Unit Trains (non-express)**
 - a. **Origin Customer (Industry) Dwell Time – Loaded Unit Train Grain / Grain Product Trains.** Measured as elapsed time between Loaded Billing and Departure from Industry Facility (Customer).
 - b. **Destination Customer (Industry) Dwell Time – Empty Unit Train Grain / Grain Product Trains.** Measured as elapsed time between Empty Released and Departure from Industry Facility (Customer).
 - **Express Trains**
 - a. **Origin Customer (Industry) Dwell Time – Loaded Express Unit Train Grain / Grain Product Trains.** Measured as elapsed time between Loaded Billing and Departure from Industry Facility (Customer).
 - b. **Destination Customer (Industry) Dwell Time – Empty Express Unit Train Grain / Grain Product Trains.** Measured as elapsed time between Empty Released and Departure from Industry Facility (Customer).
3. In addition to these more useful PDR Origin/Destination Dwell calculations, NGFA suggests narrowing the definition of Terminal Dwell ("2. Weekly Average Terminal Dwell Time Excluding Cars on Run-Through Trains Measured in Hours for 10 Largest Terminals and Overall System in Terms of Railcars Processed") to be simply "Terminal Dwell on Private Cars in Manifest Service for 10 Largest Terminals and Overall System in Terms of Railcars Processed."
 4. To assist the STB, CSXT and rail customers in best interpreting these data, NGFA also recommends that, instead of simply reporting averages in each of the aforementioned service categories, CSXT also be required to report the upper and lower limits (or range) of dwell times in the samples.
 5. Other possible service performance metrics that the STB should consider requesting from CSXT include:
 - **Gateway (Interchange) Dwell Time** for Lima, Chicago, Memphis and East St. Louis. This metric would be measured as the time elapsed from (Interchange Offered) from another railroad and when the trains or cars actually are received and pulled – both loaded and empties.
 - **Diversion Requests and Denials.** The weekly number of diversions requested by shippers for customer- owned or leased cars versus the number denied, as well as the number of diversions executed by CSXT for its own equipment. The NGFA believes this would help demonstrate the inconsistency with diversions for railroad-controlled pools (i.e., automotive, intermodal and boxcars).

- **Problem Logs:** NGFA has received reports that when CSXT logs are opened related to service delays, once the CSXT merely develops a “plan” for departure, the log is closed – even though the cars may not have departed. In addition, CSXT allegedly is not following through on delayed cars’ transit to destination; for example, for cars delayed in Atlanta and later transiting to New Jersey, CSXT allegedly may be closing the log and not following or monitoring the car until it arrives in New Jersey.
6. **CSX Employment:** Weekly data on the number of CSXT employees working in service-specific departments and functions, including customer service, sales, marketing and by operational area (e.g., trainmasters, division managers, crews, switch yard personnel, maintenance, etc.).

Finally, the NGFA recommends that the Board require CSXT to state precisely the methodology it uses to calculate and report all service-performance metrics being submitted to the Board – and to make that methodology public – to reduce the potential for manipulation of data that portrays a rosier situation than truly exists.

It is NGFA’s hope that these additional metrics will help the Board, rail customers and CSXT gain a better understanding of service performance and issues that still require attention and improvement.