

September 5, 2014

By Electronic Filing

Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Docket No. EP 722 and EP 664 (SUB-NO. 2)

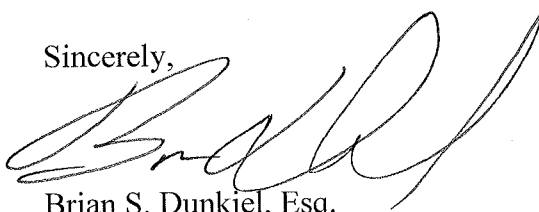
Dear Ms. Brown,

Enclosed for filing in the above-referenced matter, please find

- (1) *Opening Comments of Friends of the Earth, Inc. (FoE)*;
- (2) *Opening Verified Statement of Gerald W. Fauth III* supporting FoE's comments;
- (3) *Opening Comments of Western Organization of Resource Councils Inc., and Northern Plains Resource Council Inc.*, which join in FoE's opening comments; and
- (4) *Certificate of Service* in both above-named dockets.

Please feel free to contact me should you have any questions.

Sincerely,



Brian S. Dunkiel, Esq.

DUNKIEL SAUNDERS ELLIOTT RAUBVOGEL & HAND, PLLC

BD/lw

Enclosures

Cc: Service List

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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

DOCKET NO. EP 722

RAILROAD REVENUE ADEQUACY

DOCKET NO. EP 664 (SUB-NO. 2)

**PETITION OF THE WESTERN COAL TRAFFIC LEAGUE
TO INSTITUTE A RULEMAKING PROCEEDING TO
ABOLISH THE USE OF THE MULTI-STAGE DISCOUNTED CASH FLOW MODEL
IN DETERMINING THE RAILROAD INDUSTRY'S COST OF EQUITY CAPITAL**

**OPENING COMMENTS
OF
FRIENDS OF THE EARTH**

Friends of the Earth (FoE) respectfully submits the following comments in Dockets EP 722 and EP 664 (Sub-No.2) to request that the Surface Transportation Board (STB or Board) prepare an Environmental Impact Statement (EIS) to evaluate potential significant environmental impacts of the decisions under consideration in these dockets. At a minimum, the STB must prepare an Environmental Assessment (EA) to comply with its obligations under the National Environmental Policy Act (NEPA) and its NEPA implementing regulations to support any decision it makes in these dockets. 42 U.S.C. §4331; 49 CFR §1105, 40 CFR §1500.3. FoE hereby requests that the STB prepare the required notice and commence NEPA scoping pursuant to 49 CFR §1105.10.

FoE is a tax exempt, nonprofit environmental advocacy organization founded in 1969 and incorporated in the District of Columbia. FoE has over 33,000 members across the nation. FoE's mission is to defend the environment and champion a healthy and just world. One of

FoE's programs promotes energy conservation and clean energy sources, including wind, solar, and geothermal power, to end dependence on fossil fuels, reduce greenhouse gas emissions, and mitigate climate change. A second program focuses on stopping environmental harms caused by the transportation of fossil fuels.

Friends of the Earth, in collaboration with the member groups of Friends of the Earth International in 74 countries internationally, promotes policies and actions to control climate change, especially by addressing the use of fossil fuels that produce greenhouse gases. One approach taken by FoE is to focus the attention of the public, our members, and government decision makers on the environmental impacts of fossil fuel transportation, specifically, the transportation of domestic coal by rail. In doing this work FoE has highlighted the impacts of fossil fuel projects such as tarsands pipelines and coal export terminals. FoE has worked with landowners who will be impacted by the decision before the Board in this docket, and has members who are impacted by climate change, and who live and recreate near railways that would be impacted by increased traffic, which would likely result from the Board's decision in this matter. FoE is requesting that the Board prepare the appropriate environmental analysis in this matter in order to help protect the interest of its members and to help educate the public on the environmental impact of governmental decisions that contribute to climate change and facilitate the extraction, transportation, and combustion of fossil fuels in the U.S..

In these two dockets the STB is considering both the Board's methodology for determining railroad revenue adequacy, including the revenue adequacy component used in judging the reasonableness of rail freight rates (EP 722), and the Board's methodology for calculating the railroad industry's cost of equity capital (EP 664 (Sub-No.2)). The issues presented in these combined dockets stem, in part, from a petition filed by the Western Coal

Traffic League (WCTL), an organization whose sole purpose is to “advance and protect the interests of consumers of coal produced from United States mines located west of the Mississippi”¹ The WCTL’s petition states that its members are subject to “unreasonably high rail rates” and the clear aim of the WCTL’s petition is to use the Board’s jurisdiction over this matter to attempt to decrease the cost of shipping coal, allowing the WCTL’s members to more profitably burn coal, which would likely increase the number of loaded and empty coal trains moving over our Nation’s rail system. *See* Petition of Western Coal Traffic League to Institute a Rulemaking Proceeding to Abolish Use of the Multi-stage Discounted Cash Flow Model in Determining the Railroad Industry’s Cost of Capital (August 27, 2013).

In response to the WCTL’s petition, the Board instituted a rulemaking procedure to consider the issue of railroad cost of equity capital, which has been joined with the Board’s consideration of railroad revenue adequacy in Docket No. EP-722.

As demonstrated by the Opening Verified Statement of Gerald W. Fauth III, the decisions contemplated in these dockets have the potential to cause significant environmental impacts by, among other things, altering the amount of coal transported by rail. *See generally* Fauth Statement, Exhibit 1.

STB rules are clear that that rulemaking decisions that have the “potential for significant environmental impacts” require the preparation of at least an EA. 49 CFR §1105.6(5). The decisions contemplated in these dockets are not mere “ministerial” acts and are not otherwise covered by a properly adopted categorical exclusion. *See* 49 CFR §§1105.5, 1105.6. As a result, the Board must prepare the appropriate environmental reports to evaluate potential impacts of the decisions. The Board may not dismiss this obligation by simply stating that the impacts of the

¹*See* <http://www.westerncoaltrafficleague.com/>, last visited September 2, 2014.

decision are not significant – Council of Environmental Quality (CEQ) regulations implementing NEPA require preparation of an EA to make a determination of significance, where, as here, the actions are not categorically excluded. 40 C.F.R. § 1501.4(b).

As indicated in both CEQ regulations and the Board’s own rules, the determination of whether a particular impact may be significant requires the Board to consider both the “context and intensity” of the impact. 40 C.F.R. § 1508.27; 49 C.F.R. § 1105.5(a). Under NEPA, “context” means that “the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action.” 40 C.F.R. § 1508.27. “Intensity” should consider, among other things:

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

Id. Furthermore, the STB “must disclose and evaluate all of the effects of a proposed action—direct, indirect, and cumulative.” *High Country Conservation Advocates v. United States Forest Serv.*, 2014 WL 2922751 (D. Colo. June 27, 2014); 40 C.F.R. § 1508.8(b). “An environmental effect is “reasonably foreseeable” if it is “sufficiently likely to occur that a person of ordinary prudence would take it into account in reaching a decision.” *Mid States Coal. for Progress v. Surface Transp. Bd.*, 345 F.3d 520, 549 (8th Cir. 2003) (citing *Sierra Club v. Marsh*, 976 F.2d 763, 767 (1st Cir.1992)). In addition, the STB must consider the indirect effects of its decision, even if those indirect impacts occur outside the United States. *Border Power Plant Working Grp. v. Dep’t of Energy*, 260 F. Supp. 2d 997, 1023 (S.D. Cal. 2003). “If an agency decides not to prepare an EIS, it must supply a convincing statement of reasons to explain why a project's

impacts are insignificant.” *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1211 (9th Cir.1998).

As outlined in Mr. Fauth’s statement, changes in the Board’s methodological approach to determining railroad revenue adequacy, and the underlying cost of capital calculations have the real potential of impacting captive rail traffic such as coal movements, thereby impacting the overall tonnage of coal transported by rail. As Mr. Fauth explains, “revenue adequacy could be a major factor in future railroad rate cases and serve to constrain railroad coal and other captive railroad traffic rate levels. Constrained railroad coal rates could result in an increase in railroad coal movements.” Fauth Statement at 9. Similarly, the STB’s decision in how it calculates the cost of equity capital also has the potential to significantly impact the human environment because, among other things, it could impact the quantity of coal shipped. Indeed, the ICC concluded as much in its evaluation of *Coal Rate Guidelines*.

By way of example, in Table 7 Mr. Fauth compares NS and CSX coal tonnage of coal in 2006 and 2013 to demonstrate how the change in revenue adequacy has the potential to impact coal tonnage volumes.

Table 7.

**Comparison of Losses in NS and CSX
Annual Coal Volumes - 2006 versus 2013**

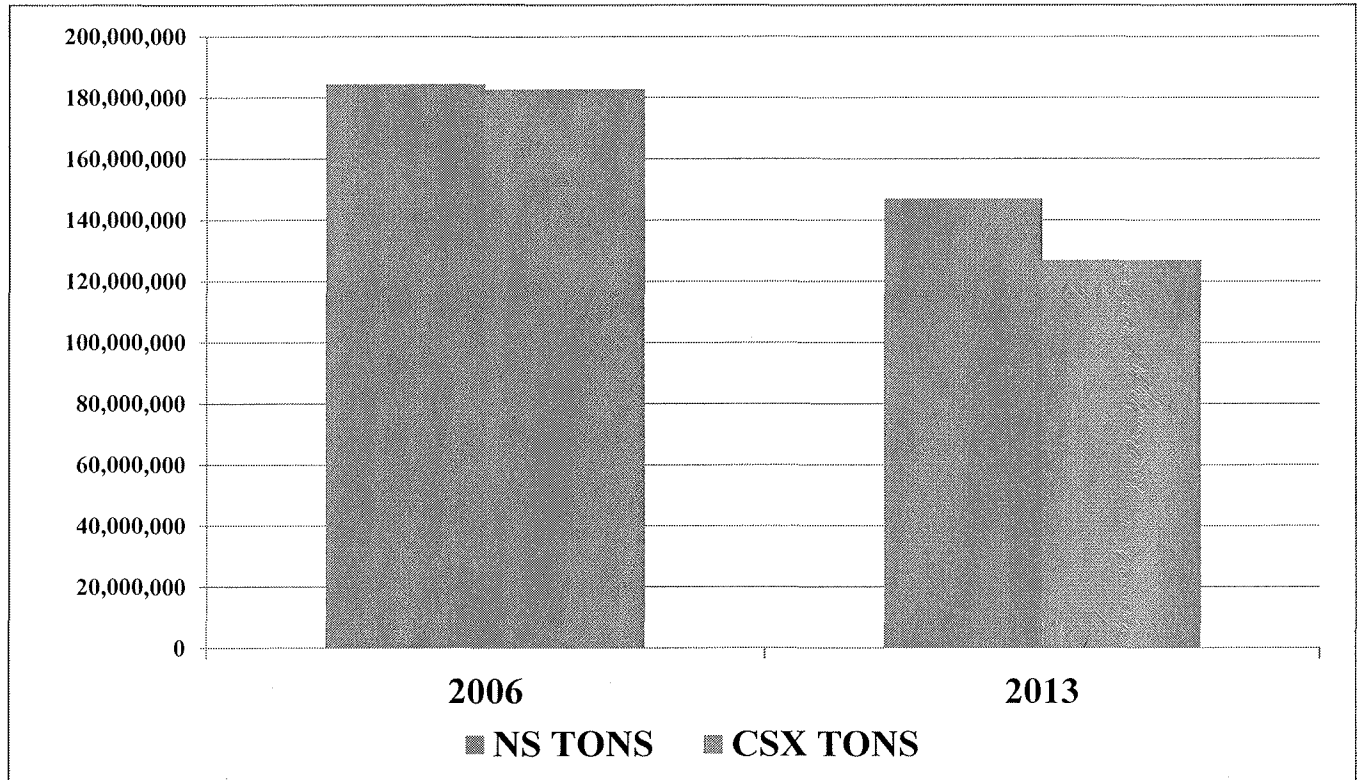


Table 7 shows that that the rate constrained railroad experienced higher coal losses than the non-constrained railroad. Mr. Fauth’s Table 8 shows that even small changes in coal traffic levels can have significant impacts on loaded and empty cars. “Even a small 5% change in the coal traffic levels could result in a change of 8.11 loaded and empty trains per day and a 20% change would result in a change of 32.45 loaded and empty trains per day.” Fauth at 19.

This analysis demonstrates that the types of methodological issues that are the focus of this rule-making proceeding have a reasonably foreseeable impact on the level of rail traffic. Such changes have clear, direct and indirect environmental impacts which must be disclosed to the public, and fully evaluated before the Board takes any action in this docket.

Some of these environmental impacts are self-evident. Coal is transported by rail for one reason – to burn it at some remote location to produce energy. The combustion of coal necessarily releases carbon dioxide into the atmosphere, and it is beyond dispute in this day and age that such fossil fuel combustion contributes directly to climate change, which is already having dramatic environmental impacts across the United States. According to the May 2014 report released by the U.S. Global Change Research Program (USGCRP), “evidence from the top of the atmosphere to the depths of the oceans, collected by scientists and engineers from around the world, tells an unambiguous story: the planet is warming, and over the last half century, this warming has been driven primarily by human activity—predominantly the burning of fossil fuels.”² Changes in the underlying economics of shipping coal by rail – which, as WCTL acknowledges, is a captive rail market – has the clear potential to lead to more coal shipments, increased use of relatively lower cost coal, and increases in the amount of carbon dioxide released to the atmosphere – either in the U.S., or abroad, as coal companies seek ever further markets for a product that now struggles to compete domestically.

The global warming impacts of altering coal shipments is a reasonably foreseeable effect of the STB’s decision in these dockets, and the STB must consider the global warming impacts

² Among other significant increasing climate change risks, the recent U.S. National Climate Change Assessment specifically emphasized the risk climate change poses to the nation’s rail and energy infrastructure:

Rail transportation lines that carry coal to power plants, which produced 42% of U.S. electricity in 2011, often follow riverbeds. More intense rainstorms can lead to river flooding that degrades or washes out nearby railroads and roadbeds, and increases in rainstorm intensity have been observed and are projected to continue.

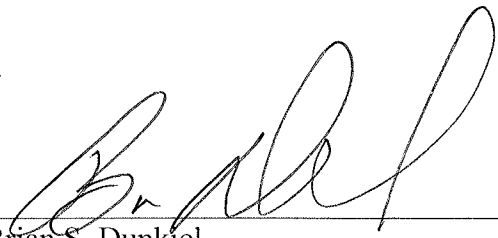
National Climate Change Assessment at 115 (2014). The Report goes on to identify rail infrastructure as “increasingly vulnerable” to climate change. *See id. at 131* (listing “fixed route infrastructure, such as...freight and commuter railways...” as “increasingly vulnerable to climate change.”).

of increased coal destined to be burned within and outside the United States. Similarly, the Board must evaluate other direct and indirect environmental impacts which may result from changes in the number of railroad coal movements. These include, but are not necessarily limited to, environmental impacts associated with increases in coal extraction resulting from the availability of lower cost coal, and increases in the nature and intensity of impacts in communities along rail transport routes associated with increases in rail traffic.

The Board has before it a docket that was instituted at the request of a particular interest group that seeks to reduce the price of shipping coal so that its members can burn more coal at a more profitable rate. The Board has an obligation to consider the issues presented by the WCTL. However, the Board also has an independent obligation to evaluate and fully disclose the potential environmental impacts of its decisions – which may, or may not, ultimately adopt the WCTL's position. FoE respectfully requests that the Board fulfill its clear obligations under NEPA and institute the mandatory scoping process to proceed with an appropriate assessment of the significant environmental impacts associated with decisions at issue in this docket.

Dated at Burlington, Vermont this 5th day of September 2014.

Attorneys for Friends of the Earth, Inc.



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BEFORE THE
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DOCKET NO. EP 722

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**PETITION OF THE WESTERN COAL TRAFFIC LEAGUE
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**OPENING VERIFIED STATEMENT
OF
GERALD W. FAUTH III**

My name is Gerald W. Fauth III. I am President of G. W. Fauth & Associates, Inc., an economic consulting firm with offices at 116 South Royal Street, Alexandria, Virginia 22314. A statement describing my background, experience and qualifications is attached hereto as Appendix GWF-1. As indicated therein, I have over 35 years experience involving economic, regulatory, public policy and legislative issues primarily associated with, or related to, the U. S. railroad industry. Most of my work has involved regulatory proceedings and related projects before, or related to, the U.S. Surface Transportation Board (STB) and its predecessor, the Interstate Commerce Commission (ICC).

On April 2, 2014, the STB announced that it would receive comments in STB Docket No. EP 722, Railroad Revenue Adequacy, and Docket No. EP 664 (Sub-2), Petition Of The Western Coal Traffic League To Institute A Rulemaking Proceeding To Abolish The Use Of The Multi-Stage Discounted Cash Flow Model In Determining The Railroad Industry's Cost Of Equity Capital. The Board is seeking comments in these proceedings on three major regulatory issues:

- Revenue Adequacy Methodology
- Use of Revenue Adequacy in Large Railroad Rate Reasonableness Cases
- Cost of Capital (COC) Methodology

Since these issues are interconnected and important, the Board coordinated the two proceedings by inviting comments in both cases on the same schedule. The STB also announced that it will hold a hearing to address these issues.

I have been asked to prepare and submit these opening comments in these STB proceedings by the law firm of Dunkiel Saunders Elliott Raubvogel & Hand, PLLC on behalf of their client, Friends of the Earth (FOE), which is a non-profit environmental advocacy group with offices in Berkeley, California and Washington, DC.

STB & NEPA Compliance

Included at the end of the STB's April 2, 2014 decision (and at the end of the vast majority of decisions issued by the STB) is the following boiler-plate environmental impact language:

"This action will not significantly affect either the quality of the human environment or the conservation of energy resources."

This brief statement is the STB's attempt to declare that the decision is in compliance with The National Environmental Policy Act (NEPA) (42 U.S.C. 4331-4335), which was signed into law in 1969. Under NEPA, the STB is required to examine the environmental impacts of many actions subject to the STB's jurisdiction. The STB must take into account in its decision-making the environmental impacts of its actions, including direct, indirect and cumulative impacts. The STB must consider these impacts before making its final decision in a case.

The STB's environmental rules can be found at 49 CFR § 1105. The STB's environmental rules are designed to "ensure adequate consideration of environmental factors in the STB's decision-making process." According to the STB's rules (49 CFR § 1105.5(a)), the STB is guided in determining whether a decision has "the potential to affect significantly the quality of the human environment," by the definition of "significantly" under Council on Environmental Quality (CEQ) rules (40 CFR § 1508.27).

The STB's Office of Environmental Analysis (OEA) is the office within the STB responsible for directing the environmental review process, conducting independent analysis of all environmental data, and making environmental recommendations to the STB. Depending upon the case, the STB may require an Environmental Assessment (EA) or a more detailed Environmental Impact Statement (EIS). During these environmental reviews, the STB often works with state agencies and other Federal agencies which may have jurisdiction, such as Federal Railroad Administration (FRA), and U.S. Army Corps of Engineers, the U.S. Fish and Wildlife Service and The National Park Service.

Since its establishment in 1996, the STB's environmental review process has been primarily restricted to major Class I mergers, rail acquisitions, proposed railroad line construction and rail line abandonment cases. For example, one of the most recent STB

environment review involved a Draft Environmental Assessment (Draft EA), in which the STB analyzed the potential environmental effects of the proposal construction of 1,360 feet of track in Elbert County, Georgia to allow a shortline railroad to connect to a CSX Transportation, Inc. (CSX) line.

Appendix GWF-2 is a listing of the proceedings in which the STB has conducted environmental reviews in Finance Dockets (FD). This listing excludes numerous abandonment (AB) proceedings in which the STB conducted environmental reviews. Some of these proceedings involved relatively small impact areas and others, such as the DM&E case and the Conrail acquisition, covered large geographical areas.

NEPA Compliance in Railroad Rulemaking Proceedings

Although it rarely, if ever, does so, the STB's rules provide that an environmental assessment may be required in "A rulemaking, policy statement, or legislative proposal that has the potential for significant environmental impacts." (49 CFR §1105.6 (b)(5)) The STB has apparently determined that an environmental assessment is not required for these rulemaking proceedings. In fact, in my review of past STB decisions since 1996, I could find no STB rulemaking (Ex Parte or EP Dockets) proceedings in which the STB conducted an environmental review. Certainly, not every public STB rulemaking would require an environmental assessment. However, there are clearly instances where changes in the STB's rules have the potential to significantly affect the human environment.

For example, the STB's predecessor, the ICC, conducted environmental reviews in major rulemakings and prepared one when considering similar issues in ICC Ex Parte No. 347 (Sub-No.1), Coal Rate Guidelines, Nationwide (*Coal Rate Guidelines*), which set forth the

concept of revenue adequacy as a component of the Board's standard for judging the reasonableness of rail freight rates. The ICC's Final EIS cover page is attached hereto as Appendix GWF-3.

As indicated herein, the instant major STB rulemaking proceedings, like *Coal Rate Guidelines*, could have significant economic impacts on future railroad pricing and future railroad freight rate levels, which could have significant concomitant impacts on railroad traffic volumes, especially for captive rail traffic such as railroad coal and oil movements. The railroads clearly understand the importance of these proceedings and the potential impacts:

AAR and its member railroads view the *Cost of Capital* and *Revenue Adequacy* proceedings as among the most important matters to come before the Board in recent years, and undoubtedly many rail customers and shipper organizations share that view.¹

Railroad coal shippers also understand the importance and significance of these proceedings as indicated in Western Coal Traffic League's (WCTL) petition in EP 664 (Sub-No.2):

The COC is a critical input for calculating variable costs, the associated jurisdictional threshold, and stand-alone costs. An overstated COC directly exposes captive shippers, including some WCTL members, to unreasonably high rail rates. For the most part, those who pay the railroads for coal transportation are the nation's electricity consumers. The COC also colors the general perception of railroad costs and the Board's view of the railroads' revenue adequacy. An accurate COC is of deep concern to WCTL and its members as well as shippers generally.

As a result of potential changes in railroad rate and traffic levels, these proceedings have "the potential for significant environmental impacts" and, therefore, should require an environmental assessment by the STB.

¹ Docket No. EP 722 and EP 664 (Sub-2), AAR Petition For Modification of the Procedural Schedule, filed May 12, 2014, page 2.

It should be noted that the issues being considered by the STB in these rulemaking proceedings could result in both beneficial and adverse impacts. Under the STB/CEQ “significantly” rules, the STB, in evaluating intensity or severity of impacts, should consider “impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.” (40 CFR § 1508.27(b)(1)) The terms “beneficial” and “adverse” may be difficult to distinguish here. For example, WCTL and its members would likely consider lower railroad coal rates and more coal movements as beneficial, whereas, AAR and the railroads would likely consider higher coal rates as beneficial, which could limit the increase in railroad coal movements. FOE would undoubtedly view fewer railroad coal movements as beneficial to the environment. Whether or not the Board or parties in these proceedings perceive the potential impacts to be beneficial or adverse, the impacts should be studied and reviewed via an environmental assessment by the STB.

Revenue Adequacy Methodology

These proceedings could significantly change the way that the STB annually determines whether a Class I railroad carrier is deemed “revenue adequate” or “revenue inadequate,” which is currently based on a comparison of a railroads’ tax adjusted return on investment (ROI) with the STB’s current cost of capital (COC). The concept of measuring revenue adequacy was first introduced in 1976 in the Railroad Revitalization And Regulatory Reform Act (4-R Act) and expanded in 1980 by the Staggers Rail Act of 1980 (Staggers), which required the ICC to begin determining annually “which rail carriers are earning adequate revenues.”

The following table summarizes the STB’s revenue adequacy determinations since 2000:

Table 1

STB Revenue Adequacy Determinations Since 2000
(Revenue Adequate Determinations Highlighted)

Year	Item	BNSF	CSX	GTW (CN)	KCS	NS	SOO (CP)	UP
2000	COC	11.00%	11.00%	11.00%	11.00%	11.00%	11.00%	11.00%
2000	ROI	8.80%	3.60%	5.90%	6.30%	5.50%	5.60%	6.90%
2000	ROI-COC	-2.20%	-7.40%	-5.10%	-4.70%	-5.50%	-5.40%	-4.10%
2001	COC	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%	10.20%
2001	ROI	7.10%	4.60%	4.90%	7.00%	8.30%	5.90%	7.60%
2001	ROI-COC	-3.10%	-5.60%	-5.30%	-3.20%	-1.90%	-4.30%	-2.60%
2002	COC	9.80%	9.80%	9.80%	9.80%	9.80%	9.80%	9.80%
2002	ROI	6.40%	5.20%	3.10%	6.50%	9.10%	5.70%	8.60%
2002	ROI-COC	-3.40%	-4.60%	-6.70%	-3.30%	-0.70%	-4.10%	-1.20%
2003	COC	9.40%	9.40%	9.40%	9.40%	9.40%	9.40%	9.40%
2003	ROI	6.21%	4.00%	4.50%	3.70%	9.10%	0.90%	7.30%
2003	ROI-COC	-3.19%	-5.40%	-4.90%	-5.70%	-0.30%	-8.50%	-2.10%
2004	COC	10.10%	10.10%	10.10%	10.10%	10.10%	10.10%	10.10%
2004	ROI	5.84%	4.43%	5.95%	8.30%	11.64%	3.28%	4.54%
2004	ROI-COC	-4.26%	-5.67%	-4.15%	-1.80%	1.54%	-6.82%	-5.56%
2005	COC	12.20%	12.20%	12.20%	12.20%	12.20%	12.20%	12.20%
2005	ROI	9.76%	6.23%	8.07%	5.89%	13.21%	8.89%	6.34%
2005	ROI-COC	-2.44%	-5.97%	-4.13%	-6.31%	1.01%	-3.31%	-5.86%
2006	COC	9.94%	9.94%	9.94%	9.94%	9.94%	9.94%	9.94%
2006	ROI	11.43%	8.15%	9.47%	9.31%	14.36%	11.60%	8.21%
2006	ROI-COC	1.49%	-1.79%	-0.47%	-0.63%	4.42%	1.66%	-1.73%
2007	COC	11.33%	11.33%	11.33%	11.33%	11.33%	11.33%	11.33%
2007	ROI	9.97%	7.61%	10.11%	9.37%	13.55%	15.25%	8.90%
2007	ROI-COC	-1.36%	-3.72%	-1.22%	-1.96%	2.22%	3.92%	-2.43%
2008	COC	11.75%	11.75%	11.75%	11.75%	11.75%	11.75%	11.75%
2008	ROI	10.51%	9.34%	9.89%	7.72%	13.75%	9.29%	10.46%
2008	ROI-COC	-1.24%	-2.41%	-1.86%	-4.03%	2.00%	-2.46%	-1.29%
2009	COC	10.43%	10.43%	10.43%	10.43%	10.43%	10.43%	10.43%
2009	ROI	8.67%	7.30%	6.04%	6.51%	7.69%	6.28%	8.62%
2009	ROI-COC	-1.76%	-3.13%	-4.39%	-3.92%	-2.74%	-4.15%	-1.81%
2010	COC	11.03%	11.03%	11.03%	11.03%	11.03%	11.03%	11.03%
2010	ROI	10.28%	10.85%	9.21%	9.77%	10.96%	8.01%	11.54%
2010	ROI-COC	-0.75%	-0.18%	-1.82%	-1.26%	-0.07%	-3.02%	0.51%
2011	COC	11.57%	11.57%	11.57%	11.57%	11.57%	11.57%	11.57%
2011	ROI	12.39%	11.54%	8.74%	10.76%	12.87%	7.13%	13.11%
2011	ROI-COC	0.82%	-0.03%	-2.83%	-0.81%	1.30%	-4.44%	1.54%
2012	COC	11.12%	11.12%	11.12%	11.12%	11.12%	11.12%	11.12%
2012	ROI	13.47%	10.81%	10.19%	9.54%	11.48%	5.15%	14.69%
2012	ROI-COC	2.35%	-0.31%	-0.93%	-1.58%	0.36%	-5.97%	3.57%
2013	COC	11.32%	11.32%	11.32%	11.32%	11.32%	11.32%	11.32%
2013	ROI	14.01%	10.00%	11.84%	8.67%	12.07%	12.03%	15.39%
2013	ROI-COC	2.69%	-1.32%	0.52%	-2.65%	0.75%	0.71%	4.07%

As can be seen, out of ninety-eight (98) revenue adequacy determinations in the last fourteen (14) years, the STB has found that a railroad is revenue adequate only twenty (20) times (highlighted in yellow), eleven (11) of which have been in the last three years. In the last three years, BNSF, UP and NS have been determined to be revenue adequate. In 2013, CN and CP were added to the list of revenue adequate railroads. CSX has been close to (less than one percentage point away in 2011 and 2012) achieving that goal. After nearly four decades since the revenue adequacy concept was first promulgated, it appears that the major U.S. Class I railroads are finally nearly the goal of achieving long-term revenue adequacy.

Table 1 illustrates that even small or minor change to the STB's current revenue adequacy or COC methodologies could result in more or less carriers becoming revenue adequate. For example, the changes sought by WCTL in Docket No. EP 664 (Sub-2) could reduce the COC level. As can be seen from Table 1, a change of only 0.03% in 2011 would have resulted in CSX being found to be revenue adequate. Since revenue adequacy determinations can impact railroad coal and other rates, revenue adequacy determinations can also impact railroad coal and other traffic volumes.

Use of Revenue Adequacy in Railroad Rate Reasonableness Cases

In 1985, the ICC issued a decision *Coal Rate Guidelines*, which set forth the concept of revenue adequacy as a component of the Board's standard for judging the reasonableness of rail freight rates.² The ICC established a pricing principle known as "Constrained Market Pricing" (CMP), which included revenue adequacy as one of the constraints on pricing. The revenue adequacy constraint ensures that a captive shipper will "not be required to continue to pay

² 1 I.C.C.2d 520 (1985)

differentially higher rates than other shippers when some or all of that differential is no longer necessary to ensure a financially sound carrier capable of meeting its current and future service needs.”³ Despite its long existence, however, the Board has never addressed how the revenue adequacy constraint would work in practice in large railroad coal rate cases.

This has not been a significant issue in the past since very few railroads were found to be revenue adequate. In the last three years, BNSF, UP and NS have been determined to be revenue adequate and CSX is close to achieving that goal. As a result, revenue adequacy could be a major factor in future railroad rate cases and serve to constrain railroad coal and other captive railroad traffic rate levels. Constrained railroad coal rates could result in an increase in railroad coal movements, whereas unconstrained railroad coal rate increases on captive traffic could have the opposite effect.

Cost of Capital (COC) Methodology

The current cost of capital is the benchmark or threshold for determining revenue adequacy. A Class I railroad’s ROI must exceed the COC in order to be found to be revenue adequate. The COC currently is developed by combining average long term debt rates and the cost of equity (COE):⁴

³ *Coal Rate Guidelines*, 1 I.C.C. 2d at 535-36.

⁴ STB Docket No. EP 558 (Sub-No. 17), Railroad Cost Of Capital—2013, served July 31, 2014

Table 2

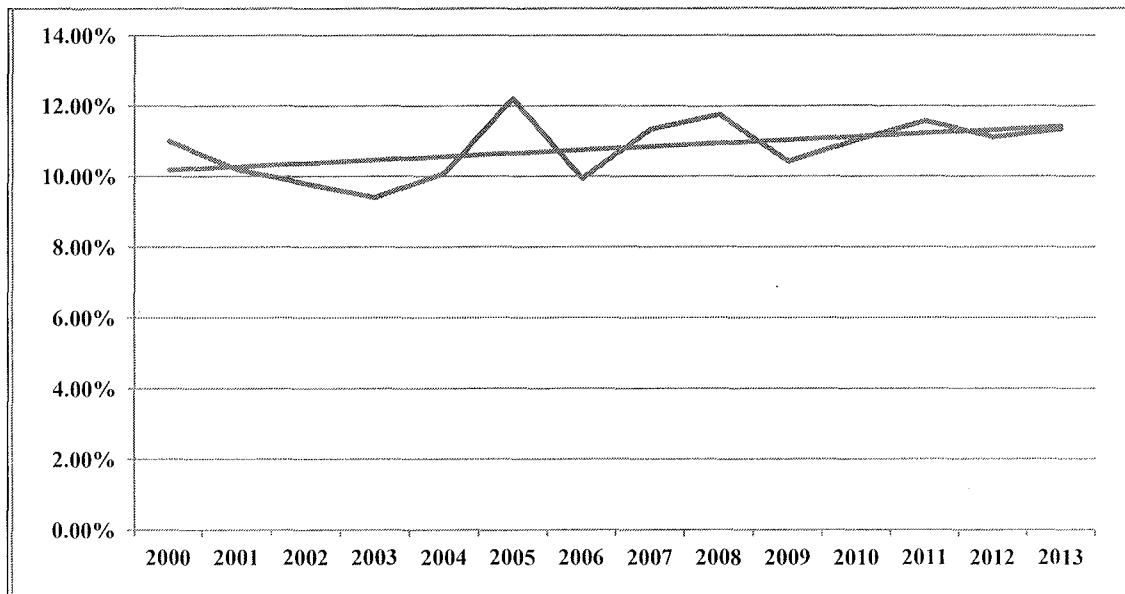
STB's 2013 Cost of Capital Computation

Type of Capital	Cost	Weight	Weighted Average
Long-Term Debt	3.68%	17.69%	0.65%
Common Equity	12.96%	82.31%	10.66%
Preferred Equity	3.87%	0.004%	0.00%
Cost of Capital		100.00%	11.32%

Since 2000, the COC has averaged 10.8% and fluctuated from a low of 9.4% in 2003 to a high of 12.2% in 2005:

Table 3

Changes in STB's Current Cost of Capital Rate Since 2000



The petition filed by the WCTL requested that the Board institute a rulemaking to abolish the use of its Multi-Stage Discounted Cash Flow (MSDCF) model in its determination of the railroad cost of equity (COE) and COC and, instead, rely exclusively on a Capital Asset Pricing Model (CAPM), which, if adopted by the Board, would likely result in a reduction on the COE and COC.

As WCTL points out in its petition, COC is a “critical input” for calculating variable costs of an individual railroad movement using the STB’s Uniform Railroad Costing System (URCS) and the associated jurisdictional threshold.⁵ As a result, as COC increases, less rail traffic is subject to STB jurisdiction and as COC decrease, more traffic is subject to STB jurisdiction. Traffic that is not subject to STB jurisdiction (i.e., traffic with R/VC ratios below 180%), may have a greater ability to increase rates without fear of STB intervention.

ICC’s EIS in *Coal Rate Guidelines*

As previously indicated, the ICC conducted an environmental review in *Coal Rate Guidelines*. The ICC undertook a lengthy environmental review process and prepared detailed Draft and Final EIS. The ICC looks at several potential adverse environmental impacts associated with coal production and consumption, including impacts on: air quality, land, water use, solid waste, energy, employment, injuries and fatalities. The following table shows the coal production projections used by the ICC in *Coal Rate Guidelines*.⁶

⁵ WCTL Petition page 2.

⁶ Final EIS *Coal Rate Guidelines*, January 4, 1985, Table 5-1. The ICC also developed projections for coal producing areas within each region, such as Central Appalachia and Western Northern Great Plains.

Table 4

**U.S. Coal Production Projections
Used By the ICC in *Coal Rate Guidelines***

Item	East Tons (Millions)	West Tons (Millions)	U.S. Tons (Millions)
1980 Actual	614.5	209.1	824.6
1985 Base Case	646.1	256.2	902.8
1990 Base Case	769.6	294.5	1,064.2
50% Rate Increase	758.1	261.8	1,019.9
15% Rate in Increase Per Year	754.0	260.3	1,014.3
100% Rate Increase	743.0	249.9	993.0
150% Rate Increase	727.3	243.2	970.5
1995 Base Case	965.4	336.4	1,301.7
50% Rate Increase	945.8	302.1	1,247.9
15% Rate in Increase Per Year	927.9	286.4	1,214.3
100% Rate Increase	927.8	279.9	1,206.8
150% Rate Increase	908.8	263.0	1,171.8

The ICC's "Base Case" assumed no cost increases other than inflation. Under each Base Case scenario (1985, 1990 and 1995), the projected coal volumes increased (i.e., from 824.6 million tons in 1980 to 902.8 million tons in 1985, 1,064.2 million tons in 1990 and 1,301.7 million tons in 1995). The ICC also looked rate increase scenarios of 15% per year and immediate across the board increases of 50%, 100% and 150%. As can be seen, in every case, rate increases reduced annual coal production levels below the Base Case levels. The largest difference is approximately 130 million tons (150% increase versus Base Case in 1995).

The ICC also looked at potential adverse impacts associated with *Coal Rate Guidelines* on coal transportation (rail and water). The ICC evaluated coal transportation impacts on: energy, air quality, noise, employment and safety. The ICC also looked at potential "downline" impacts on traffic delay, community barriers and rail line construction.

The ICC used the following coal traffic projections for rail transportation:⁷

Table 5
U.S. Coal Rail Transportation Requirements
Used By the ICC in *Coal Rate Guidelines*

Item	U.S. Rail Coal Transportation	
	Ton-Miles (Billions)	% Change From Base Case
1985 Base Case	383	-----
1990 Base Case	469	100%
50% Rate Increase	-92	-20%
15% Rate in Increase Per Year	-107	-23%
100% Rate Increase	-127	-27%
150% Rate Increase	-144	-31%
1995 Base Case	534	100%
50% Rate Increase	-85	-16%
15% Rate in Increase Per Year	-120	-22%
100% Rate Increase	-129	-24%
150% Rate Increase	-156	-29%

As can be seen, the ICC concluded railroad coal transportation would increase with constrained rate increases for inflation (i.e., from 383 BTM's in 1985 to 469 BTM's in 1990 and 534 BMT's in 1995), but that there would be significant reductions in rail coal transportation from the Base Case (16% to 31%) associated with rate increases.

The ICC concluded that the "comments basically confirm our belief that precise explication of environmental impacts associated with the Commission's proposed action, including reasonable alternatives, is virtually impossible." Notwithstanding this problem, the ICC conducted a lengthy environmental review and concluded that the "establishment of coal

⁷ Final EIS *Coal Rate Guidelines*, January 4, 1985, Table 6-11.

rate guidelines will neither affect significantly the quality of the human environment nor materially change energy consumption in the United States.”⁸ In *Coal Rate Guidelines* the ICC recognized that there was a relationship between revenue adequacy and railroad rate levels. The ICC stated that:

“... coal carried by revenue adequate railroads would not be subject to the same rate increases as coal carried by revenue inadequate railroads.”⁹

For example, coal rate increases on a revenue adequate railroad may be constrained and limited, which could result in an increase in coal movements, whereas revenue inadequate railroads may be able to significantly increase coal rates, which could limit or reduce railroad coal movements. The ICC also recognized that there was a direct relationship between railroad coal rate levels and coal production, consumption and railroad traffic levels:

“Increases in the delivered price of coal, of which transportation costs are a substantial portion, contribute to a reduction in the rate at which coal production and consumption is expected to grow in the future.”¹⁰

If coal freight rates increase under the proposed action and alternatives, corridors along most rail line segments are expected to experience a decrease in traffic (and noise levels) compared with base case projections.¹¹

EIA's NEMS Model

In *Coal Rate Guidelines*, the ICC was criticized for using averages in developing various freight scenarios. Many commenters indicated that “projected impacts are far more severe than they would be if a more realistic pricing mechanism was employed.” The ICC stated that “predictive accuracy would require line-by-line treatment of every conceivable rate adjustment”

⁸ Final EIS *Coal Rate Guidelines*, January 4, 1985, page v.

⁹ Final EIS *Coal Rate Guidelines*, January 4, 1985, E-9

¹⁰ Final EIS *Coal Rate Guidelines*, January 4, 1985, page viii.

¹¹ Final EIS *Coal Rate Guidelines*, January 4, 1985, page ix.

which the ICC described as a “massive undertaking.”¹² Technology, in the form of advanced computer modeling programs, has solved many of the problems faces by the ICC in 1985.

The STB has more recently evaluated the potential adverse impacts associated with a planned increase in railroad coal movements in STB Docket No. FD 33407, Dakota, Minnesota & Eastern Railroad Corporation. (*DM&E*) In *DM&E*, the STB overcame this problem by using a coal supply and demand computer simulation model maintained by the U.S. Department of Energy’s (DOE) Energy Information Administration (EIA) known as the National Energy Modeling System (NEMS). The STB could use this system and other available data, such as the STB’s confidential waybill sample, to evaluate the potential impacts associated with the issues in these proceedings.

NS versus CSX Comparison

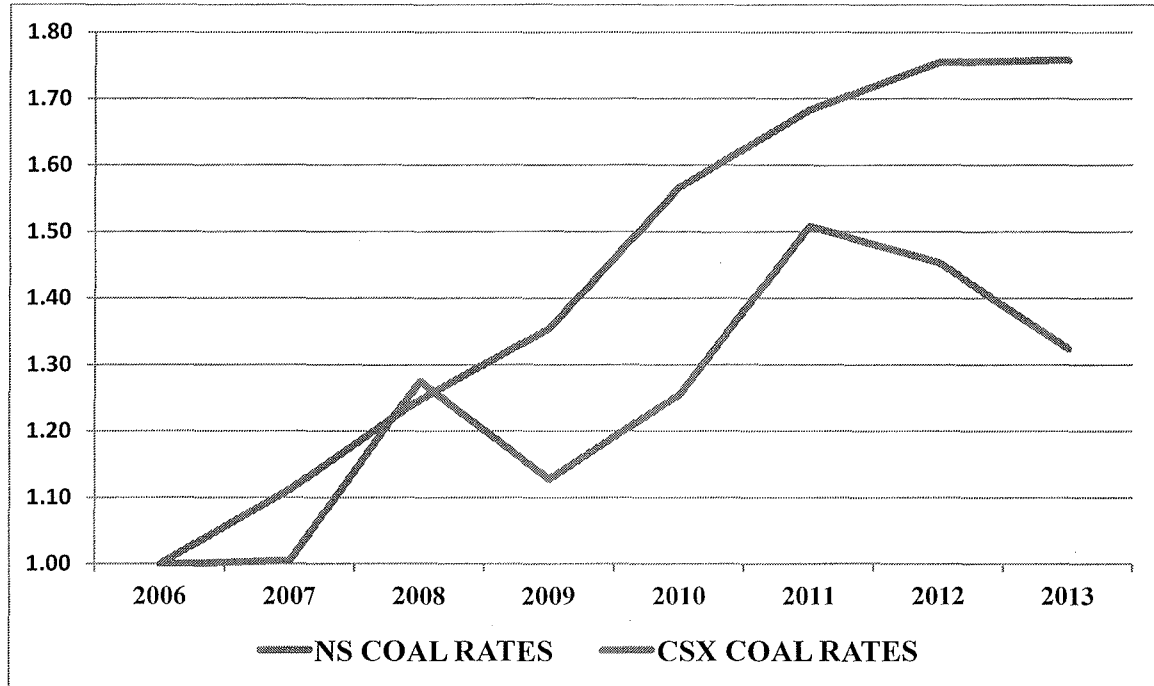
In order to illustrate the potential impact of revenue adequacy, I have compared the average change in coal rates per ton carried for NS and CSX since 2006. As indicated in Table 1, since 2004, NS has been found revenue adequate in seven (7) of the last nine (9) STB determinations, whereas CSX has never been found to be revenue adequate.

Since NS has been revenue adequate for most of the time, it may have been constrained from imposing significant coal rate increases, whereas, CSX, which has never been found to be revenue adequate, may have had greater flexibility to significantly increase rates on captive coal traffic. The following table compares the average change in coal rates per ton carried for NS and CSX since 2006:

¹² Final EIS *Coal Rate Guidelines*, January 4, 1985, page v.

Table 6

**Comparison of Changes in CSX (Revenue Inadequate) and
NS (Revenue Adequate) Coal Rates Per Ton Carried Since 2006 ¹³**

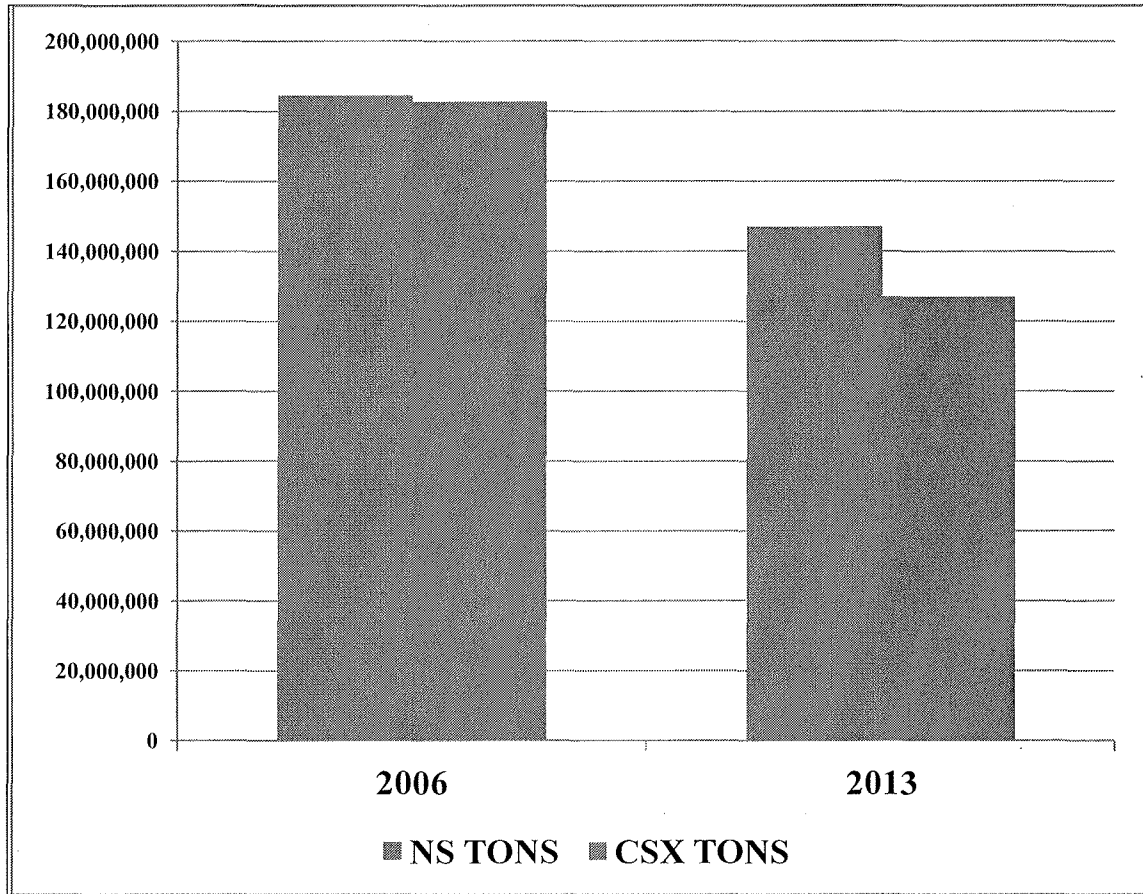


CSX's significant coal rate increases since 2006 (which were not constrained by a STB revenue adequacy determination), may have contributed to a loss of coal traffic. In 2006, CSX and NS handled comparable amounts of coal with CSX handling 182.9 million tons and NS handling 184.6 million tons. Railroad coal volumes, especially from the higher-sulfur eastern coal origins served by CSX and NS, have declined in recent years as a result of lower natural gas prices, the "War on Coal" and other factors, but NS's coal losses from 2006 to 2013 amounted to only 37.5 million tons whereas CSX's losses amounted to 55.8 million tons. The following chart shows the NS and CSX's coal volume losses:

¹³ Source: Annual Freight Commodity Statistics, based on the change in the coal revenues per ton carried. 2006 = 100.

Table 7

**Comparison of Losses in NS and CSX
Annual Coal Volumes - 2006 versus 2013**



**Potential Impact Analysis on
Current Railroad Coal Traffic**

As the ICC discovered in *Coal Rate Guidelines*, it is difficult to project the potential impacts that would be associated with changes in regulatory standards, such as revenue adequacy and cost of capital. However, this difficulty does not mean that the changes being considered by the Board will have no (0) potential impacts on railroad traffic levels and no potential environmental impacts, as the Board has apparently assumed.

As the ICC acknowledged, “coal carried by revenue adequate railroads would not be subject to the same rate increases as coal carried by revenue inadequate railroads.” The ICC also recognized that significant coal rate increases (which could be taken more easily by revenue inadequate railroads) would likely result in reductions in the projected increase in coal movements (see Table 5).

In order to demonstrate the potential impact, I have summarized and developed the number of loaded and empty coal trains per day included in the 2012 Public Waybill Sample in the following table:

Table 8
Summary of 2012 Coal Records Included
in the STB’s Public Waybill Sample

Ln.	Item	Amount
1	Total 2012 Railroad Coal Carloads	6,842,782
2	2012 Avg. Coal Cars Per Unit Train Shipment	118.14
3	Est. Loaded Coal Trains Per Year	57,920.96
4	Est. Empty Coal Trains Per Year	57,920.96
5	Est. Loaded and Empty Coal Trains Per Day	115,841.92
6	Est. Loaded and Empty Coal Trains Per Day	317.38
7	5% Change in Trains Per Day	15.87
8	10% Change in Trains Per Day	31.74
9	15% Change in Trains Per Day	47.61
10	20% Change in Trains Per Day	63.48
11	25% Change in Trains Per Day	79.34
12	50% Change in Trains Per Day	158.69

As can be seen, with an estimated 317.38 loaded and empty coal trains moving over the U.S. railroad network every day, even small changes could result in a significant increase or decrease in the number of coal trains moving each day.

In order to demonstrate the potential impact on specific areas, I have summarized the railroad coal movements included in STB's 2012 Public Waybill Sample by origin and destination BEA areas.¹⁴ I have estimated the current number of trains per day based on the total number of carloads, an average of 118 cars per train and an empty return ratio of 2.0 (100%). This analysis is attached hereto as Appendix GWF-4.

I estimated the change (up or down) in the number of loaded and empty trains per day resulting from changes of 5%, 10%, 15% and 20%. As can be seen from Appendix GWF-4, BEA 143, Casper, WY-MT-UT, which includes the BNSF/UP high density joint-line in the Powder River Basin (PRB), is by far the largest origin area with 162.23 loaded and empty trains per day. Even a small 5% change in the coal traffic levels could result in a change of 8.11 loaded and empty trains per day and a 20% change would result in a change of 32.45 loaded and empty trains per day.

In terms of destination areas, BEA 20, Norfolk-Virginia Beach-Newport News, VA, is the largest with an estimated 21.30 loaded and empty coal trains per day. A significant amount of this coal volume is export coal. Changes of 5%, 10%, 15% and 20% could result in changes of over 1, 2, 3 and 4 loaded and empty trains per day, respectively. BEA 64, Chicago-Gary-Kenosha, IL-IN-WI, also shows up as a large coal destination area with 17.88 loaded and empty coal trains per day. A significant amount of this volume is so-call "rebill" traffic for which Chicago is actually an interchange point rather than a destination. The number of coal trains

¹⁴ The STB's Public Waybill Sample does not include and indentify specific origins and destinations nor the individual railroads involved in the movements. The Public Waybill Sample also does not include variable cost data which would enable parties to develop revenue/cost ratios and determine traffic potentially subject to STB jurisdiction.

moving to and through the already congested Chicago area is undoubtedly much higher, since many coal movements destined to other areas move through Chicago.

A more detailed impact analysis of coal traffic levels and specific impact areas could be developed by using the STB's Confidential Waybill Sample and the EIA's NEMS. However, this analysis demonstrates the potential impacts that these important rulemakings could have on many major population areas and hundreds of miles of railroad lines. Of course, these proceedings could have a much broader impact other captive railroad traffic, such as Bakken oil, chemicals, ethanol and grain shipments, which are not included in these coal totals.

BNSF's Shift from Domestic to Export Coal Shipments

In addition to potentially impacting current railroad coal traffic level, revenue adequacy may have played a role in BNSF's recent decision to focus on potential export coal movements from the Powder River Basin (PRB) to proposed export coal terminals in the Pacific Northwest (PNW) rather than focusing on increasing domestic coal movements.

Potential rate increases on BNSF's domestic coal movements may be constrained, in part, by revenue adequacy, since a utility customer could file a rate complaint with the STB and potentially limit BNSF's ability to increase rates. There may be far less rate constraints associated with export coal movements since the ultimate coal consumer will be in China, Japan or some other country, which would be unlikely to file a STB rate case.

Moreover, BNSF has more control over the export coal rate levels and the overall economics since it is in partnerships and business relationships with the coal companies and the export terminal companies. For example, the proposed Tongue River Railroad Company, Inc. (TRRC) rail line in Montana is jointly owned by BNSF and Arch Coal Inc (and also candy-industry billionaire Forrest Mars Jr. who owns impacted lands) The proposed TRRC line would

connect to BNSF's lines and move PRB coal to the proposed massive PNW coal export facilities, known as the Millennium Bulk Terminals – Longview, LLC (MBTL) project, which is served by BNSF and co-owned by Arch, and the Gateway Pacific Terminal at Cherry Point Proposal, which is also served by BNSF.¹⁵

As indicated in a recent report that I co-authored titled *Heavy Traffic Still Ahead*, over 100 million tons of BNSF PRB coal may be diverted away from the domestic market to the export coal market and the BNSF revenue adequacy status likely played a role in this planned diversion. In that report, we determined that these potential BNSF PRB to PNW export coal movements would have significant environment impacts as a result of an increase in the number of loaded and empty coal trains through major population areas, such as Spokane, Washington and Billings, Montana, as well as environmentally sensitive areas such as Glacier National Park.¹⁶

Summary

In this opening verified statement, I am not proposing or advocating any specific changes to the STB's revenue adequacy standards or its cost of capital methodology, nor am I suggesting a methodology to apply the revenue adequacy standard in rate reasonableness cases. However, I urge the Board to recognize the importance of these proceedings and to understand that that even small changes to the STB's revenue adequacy standards and cost of capital methodologies could

¹⁵ The STB is currently conducting an environment review associated with TRRC's revised construction application Docket No. FD 30186, Tongue River Railroad Company, Inc. — Rail Construction And Operation — In Custer, Powder River And Rosebud Counties, Mont. However, the STB declined to participate in the currently on-going environment review process associated with the Longview and Cherry Point proposed export coal terminals, even though both of these major projects involve extensive railroad line construction and rehabilitation.

¹⁶ See: <http://heavytrafficahead.org/pdf/Heavy-Traffic-Still-Ahead-web.pdf>

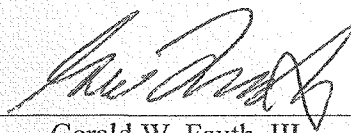
result in making a revenue adequate carrier revenue inadequate and vice versa, and could have environmental impacts.

Railroads and shippers recognize that the instant regulatory proceedings could have significant economic impacts on future railroad pricing and freight rate levels, which, in turn, could have significant concomitant impacts on railroad traffic volumes (increases and decreases), especially for captive rail traffic such as railroad coal movements. The approaches or methodologies eventually adopted by the STB in these proceedings for determining how the revenue adequacy constraint would work in practice in large railroad rate cases would obviously impact future large railroad rate cases in which a railroad has achieved revenue adequacy, which is currently the case for the three largest coal hauling railroads (i.e., BNSF, UP and NS).

As a result of the potential changes in railroad traffic levels, these proceedings have “the potential for significant environmental impacts” and, therefore, should require an environmental assessment by the STB, as was done by the ICC in *Coal Rate Guidelines*.

VERIFICATION

The foregoing statement is true and accurate to the best of my belief and knowledge.



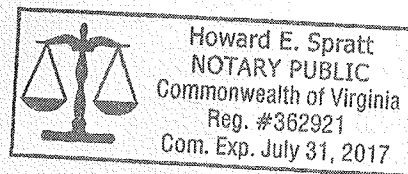
Gerald W. Fauth, III

Subscribed and sworn to before me this fifth (5) day of September, 2014.



Notary Public

My commission expires: 7-31-17



**STATEMENT
OF
BACKGROUND, QUALIFICATIONS AND EXPERIENCE
OF
GERALD W. FAUTH III**

My name is Gerald W. Fauth III. I am President of G. W. Fauth & Associates, Inc. (GWF), an economic consulting firm with offices at 116 S. Royal Street, Alexandria, Virginia 22314. I am a recognized expert on transportation issues with over 30 years experience in the private sector and in the Federal government.

This statement generally describes my background, qualifications and experience. The majority of experience has involved economic, regulatory, public policy and legislative issues primarily associated with, or related to, the U. S. railroad industry. Most of my work has involved regulatory proceedings and related projects before, or related to, the U.S. Surface Transportation Board (STB) and its predecessor, the Interstate Commerce Commission (ICC).

I have extensive experience in working in regulatory and other proceedings and projects involving railroad mergers, transactions, acquisitions, rail line construction, rail line abandonments, rate reasonableness and other railroad related issues. These matters have involved railroad issues on a nation-wide, system-wide and individual railroad line basis.

GWF has been engaged in the economic consulting business for over 50 years. My part time affiliation with GWF began in 1972. I began working for GWF on a full-time basis on May 15, 1978 and was employed by GWF continuously until November 1, 1999 at which time I took a leave of absence in order to take a position with the STB.

At the STB, I served as Chief of Staff for one of the three Board Members appointed by the President, Vice Chairman Wayne O. Burkes. I returned to GWF and consulting work effective June 23, 2003 after Mr. Burkes resigned his position to run for a political office.

Over the years, I have submitted expert testimony before ICC, STB, state regulatory commissions, courts and arbitration panels on a wide-variety of issues in numerous proceedings. In addition, I worked for 3½ years at the STB where I reviewed, analyzed and made recommendations on over 600 written formal decisions that were decided by the entire Board. These proceedings and decisions involved all matters of STB jurisdiction and had an impact on the transportation industry and the national economy.

Railroad transactions have long been the subject of ICC and STB regulatory proceedings and other matters involving: railroad merger and acquisition approval and oversight proceedings; railroad line abandonment proceedings; line sales; feeder line application proceedings; and other railroad transaction-related proceedings. I have been involved in numerous such proceedings and projects as an expert witness and as an STB staff advisor.

For example, I was an expert witness in the last two major Class I railroad merger proceedings: STB Finance Docket No. 32760, Union Pacific Corporation, et al. – Control and Merger – Southern Pacific Rail Corporation, et al. and STB Finance Docket No. 33388, CSX Corporation, et al., Norfolk Southern Corporation, et al. – Control and Operating Leases / Agreements – Conrail, Inc., et al. My testimony in these major merger proceedings concerned the potential adverse competitive impact of these mergers on two key areas.

In addition to my work in major railroad merger proceedings, I have submitted expert testimony in other railroad finance docket and abandonment proceedings before the ICC and STB. In these proceeding, I have developed and submitted evidence relating to the impacted railroad traffic and the valuation and economics of the railroad line at issue (such as: going concern and net liquidation values; freight revenues and traffic; operating costs; maintenance costs; right-of-way valuation; etc).

In addition to my testimony in railroad mergers and other rail finance and transaction proceedings, I served as an original member of the Conrail Transaction Council, which was established by the Board in Finance Docket No. 33388. This council consisted of representatives of the CSX, NS and shipper organization and provided a forum for timely and efficient communication of information and problems concerning the transaction. I was one of the original members of the Conrail Transaction Council and attended every meeting of the council until my employment with the Board.

During my time at the Board, I was actively involved in the STB merger oversight proceedings associated with the UP/SP and Conrail transactions. Perhaps the most significant merger-related proceedings that I was involved in during my time at the Board were STB Ex Parte No. 582, Public Views on Major Rail Consolidations and STB Ex Parte No. 582 (Sub-No.1), Major Rail Consolidation Procedures. These STB major rulemaking proceedings involved extensive oral hearings and written testimony from hundreds of witnesses.

The Board concluded that its existing rules governing railroad mergers and consolidations, which had been developed nearly 20 years earlier, were not adequate for addressing the broad concerns expressed and initiated a major rulemaking proceeding which resulted in a major revision to the Board's railroad merger rules.

I have a significant amount of experience in issues involving railroad rate reasonableness. I was actively involved in the initial ICC regulatory proceedings over 30 years ago in which the ICC first proposed and established guidelines which have since evolved into the STB's current railroad rate reasonableness guidelines. I was actively involved in several of the first cases to test the ICC's then proposed guidelines. For example, I was the primary expert witness in ICC Docket No. 40073, South-West Railroad. Car Parts Co. v. Missouri. Pacific Railroad, which was the *first* case to test the ICC's proposed simplified guidelines, which have since evolved into STB's Three-Benchmark approach.

More recently, I submitted extensive written and oral testimony in STB Ex Parte No. 646 (Sub-No. 1), Simplified Standards For Rail Rate Cases, on behalf of a group of 30 major stakeholders and my testimony was cited by the Board in its decision served September 5, 2007. My work and testimony in these ICC/STB proceedings has helped shape the STB's current railroad rate reasonableness guidelines.

Many of our projects have involved the development of railroad variable cost analyses based on the application of URCS and its predecessor, Rail Form A (RFA). URCS is used to determine STB jurisdiction and is an integral component of the STB's Full-SAC method, new Simplified-SAC standard and recently modified Three-Benchmark approach. I have an extensive working knowledge of the development and application of URCS and RFA. I have prepared URCS cost analyses for thousands of individual railroad movements. I also submitted expert testimony in ICC Ex Parte No. 431 (Sub-No.1), Adoption of the Uniform Railroad Costing System as a General Purpose Costing System for Regulatory Costing Purposes and more recently in STB Ex Parte No. 431 (Sub-No. 3), Review of the Surface Transportation Board's General Costing System.

Proceedings before the Board often involve traffic and market analyses using the Board's Waybill Sample, which is a computer database of approximately 600,000 records of sampled railroad movements. I am extremely familiar with this railroad traffic database. Over the years, I have performed hundreds of analyses using this data which has been used as evidence in merger and other proceedings before the Board.

I am a 1978 graduate of Hampden-Sydney College in Hampden-Sydney, Virginia where I earned a Bachelor of Arts degree. My major areas of study were history and government. My senior paper in college dealt with the History of Railroad Deregulation. I am a 1974 graduate of St. Stephen's School for Boys (now St. Stephen's and St. Agnes School), located in Alexandria, Virginia. My senior project and paper in high school dealt with the ICC and the Energy Crisis of 1973.

My professional memberships included the Transportation Research Forum and the Association of Transportation Law Professionals.

SUMMARY OF ENVIRONMENTAL REVIEWS IN STB FINANCE DOCKETS	
FD-30186	TONGUE RIVER RAILROAD COMPANY, INC.--RAIL CONSTRUCTION AND OPERATION--IN CUSTER, POWDER RIVER AND ROSEBUD COUNTIES, MONT.
FD-30186 (SUB-NO.2)	TONGUE RIVER RAILROAD CO.--RAIL CONSTRUCTION AND OPERATION--ASHLAND TO DECKER, MONTANA
FD-30186 (SUB-NO.3)	TONGUE RIVER RAILROAD COMPANY, INC.--CONSTRUCTION AND OPERATION--WESTERN ALIGNMENT
FD-32530	KANSAS CITY SOUTHERN RAILWAY COMPANY--CONSTRUCTION AND OPERATION EXEMPTION--GEISMAR INDUSTRIAL AREA NEAR GONZALES AND SORRENTO, LA
FD-32760	UNION PACIFIC CORPORATION, UNION PACIFIC RAILROAD COMPANY, AND MISSOURI PACIFIC RAILROAD COMPANY--CONTROL AND MERGER--SOUTHERN PACIFIC RAIL CORPORATION, SOUTHERN PACIFIC TRANSPORTATION COMPANY, ST. LOUIS SOUTHWESTERN
FD-33407	DAKOTA, MINNESOTA & EASTERN RAILROAD CORPORATION CONSTRUCTION INTO THE POWDER RIVER BASIN
FD-33556	CANADIAN NATIONAL RAILWAY COMPANY, GRAND TRUNK CORPORATION AND GRAND TRUNK WESTERN RAILROAD INCORPORATED--CONTROL--ILLINOIS CENTRAL CORPORATION, ILLINOIS CENTRAL RAILROAD COMPANY, CHICAGO, CENTRAL AND PACIFIC RAILROAD
FD-33652	UNION PACIFIC RAILROAD COMPANY--ACQUISITION AND OPERATION EXEMPTION--MID MICHIGAN RAILROAD, INC.
FD-33731	ELLIS COUNTY RURAL RAIL TRANSPORTATION DISTRICT--CONSTRUCTION AND OPERATION EXEMPTION--ELLIS COUNTY, TX
FD-33782	ENTERGY ARKANSAS AND ENTERGY RAIL--CONSTRUCTION AND OPERATION EXEMPTION--WHITE BLUFF TO PINE BLUFF, AR
FD-33862	PUBLIC SERVICE COMPANY OF COLORADO--CONSTRUCTION EXEMPTION--PUEBLO COUNTY, CO
FD-33877	ILLINOIS CENTRAL RAILROAD COMPANY--CONSTRUCTION AND OPERATION EXEMPTION--IN EAST BATON ROUGE PARISH, LA
FD-33928	NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN RAILWAY COMPANY--CONSTRUCTION AND OPERATION--IN INDIANA COUNTY, PA
FD-34002	ALAMO NORTH TEXAS RAILROAD CORPORATION--CONSTRUCTION AND OPERATION EXEMPTION--IN WISE COUNTY, TX
FD-34003	THE BURLINGTON NORTHERN AND SANTA FE RAILWAY COMPANY--CONSTRUCTION AND OPERATION EXEMPTION--SEADRIFT AND KAMEY, TX
FD-34040	RIVERVIEW TRENTON RAILROAD COMPANY--PETITION FOR EXEMPTION FROM 49 U.S.C. 10901 TO ACQUIRE AND OPERATE A RAIL LINE IN WAYNE COUNTY, MI
FD-34060	MIDWEST GENERATION, LLC--EXEMPTION FROM 49 U.S.C. 10901--FOR CONSTRUCTION IN WILL COUNTY, IL
FD-34075	SIX COUNTY ASSOCIATION OF GOVERNMENTS--CONSTRUCTION AND OPERATION EXEMPTION -- RAIL LINE BETWEEN LEVAN AND SALINA, UTAH
FD-34079	SAN JACINTO RAIL LIMITED CONSTRUCTION EXEMPTION AND THE BURLINGTON NORTHERN AND SANTA FE RAILWAY COMPANY OPERATION EXEMPTION--BUILD-OUT TO THE BAYPORT LOOP NEAR HOUSTON, HARRIS COUNTY, TX
FD-34117	PEMISCOT COUNTY PORT AUTHORITY--CONSTRUCTION EXEMPTION--PEMISCOT COUNTY, MO
FD-34284	SOUTHWEST GULF RAILROAD COMPANY--CONSTRUCTION AND OPERATION EXEMPTION--IN MEDINA COUNTY, TX
FD-34305	THE BURLINGTON NORTHERN AND SANTA FE RAILWAY COMPANY--CONSTRUCTION AND OPERATION EXEMPTION--MERCED COUNTY, CA
FD-34335	KEOKUK JUNCTION RAILWAY COMPANY--FEEDER LINE ACQUISITION--LINE OF TOLEDO PEORIA AND WESTERN RAILWAY CORPORATION BETWEEN LA HARPE AND HOLLIS, IL
FD-34391	NEW ENGLAND TRANSRAIL, LLC, D/B/A WILMINGTON AND WOBURN TERMINAL RAILROAD CO.--CONSTRUCTION, ACQUISITION, AND OPERATION EXEMPTION--IN WILMINGTON AND WOBURN, MA
FD-34395	CITY OF PEORIA IL, D/B/A PEORIA, PEORIA HEIGHTS AND WESTERN RAILROAD--CONSTRUCTION OF CONNECTING TRACK EXEMPTION--IN PEORIA COUNTY, IL
FD-34421	HOLRAIL LLC - CONSTRUCTION AND OPERATION EXEMPTION - IN ORANGEBURG AND DORCHESTER COUNTIES, S.C.
FD-34424	CANADIAN NATIONAL RAILWAY COMPANY AND GRAND TRUNK CORPORATION--CONTROL--DULUTH, MISSABE AND IRON RANGE RAILWAY COMPANY, BESSEMER AND LAKE ERIE RAILROAD COMPANY AND THE PITTSBURGH & CONNEAUT DOCK COMPANY
FD-34435	AMEREN ENERGY GENERATING COMPANY--CONSTRUCTION AND OPERATION EXEMPTION--IN COFFEEN AND WALSHVILLE, IL
FD-34658	ALASKA RAILROAD CORPORATION--PETITION FOR EXEMPTION--TO CONSTRUCT AND OPERATE A RAIL LINE BETWEEN NORTH POLE, ALASKA AND DELTA JUNCTION, ALASKA
FD-34821	NORFOLK SOUTHERN RAILWAY COMPANY--TRACKAGE RIGHTS EXEMPTION--MERIDIAN SPEEDWAY LLC--BETWEEN MERIDIAN, MS AND SHREVEPORT, LA
FD-34836	ARIZONA EASTERN RAILWAY--CONSTRUCTION AND OPERATION--GRAHAM COUNTY, AZ
FD-34936	PORT OF MOSES LAKE--CONSTRUCTION EXEMPTION--MOSES LAKE, WASHINGTON
FD-34992	ITASCA COUNTY REGIONAL RAIL AUTHORITY--CONSTRUCTION AND OPERATION OF A RAIL LINE IN ITASCA COUNTY, MN
FD-35087	CANADIAN NATIONAL RAILWAY COMPANY AND GRAND TRUNK CORPORATION--CONTROL--EJ&E WEST COMPANY
FD-35095	ALASKA RAILROAD CORPORATION -- CONSTRUCTION AND OPERATION EXEMPTION--A RAIL LINE EXTENSION TO PORT MACKENZIE, AK
FD-35116	R. J. CORMAN RAILROAD COMPANY/PENNSYLVANIA LINES INC.--CONSTRUCTION AND OPERATION EXEMPTION--IN CLEARFIELD COUNTY, PA.
FD-35141	U S RAIL CORPORATION--CONSTRUCTION AND OPERATION EXEMPTION--BROOKHAVEN RAIL TERMINAL
FD-35147	NORFOLK SOUTHERN RAILWAY COMPANY, PAN AM RAILWAYS, INC., ET AL.-JOINT CONTROL AND OPERATING/POOLING AGREEMENTS--PAN AM SOUTHERN LLC
FD-35218	MERIDIAN SOUTHERN RAILWAY, LLC--CONSTRUCTION OF CONNECTING TRACK EXEMPTION--IN LAUDERDALE COUNTY, MS
FD-35237	CITY OF DAVENPORT, IA -- CONSTRUCTION AND OPERATION EXEMPTION -- IN SCOTT COUNTY, IA
FD-35348	CSX TRANSPORTATION, INC. AND DELAWARE AND HUDSON RAILWAY COMPANY, INC.--JOINT USE AGREEMENT
FD-33523	CSX TRANSPORTATION, INC.--JOINT USE--LOUISVILLE & INDIANA RAILROAD COMPANY, INC.
FD-35522	CSX TRANSPORTATION, INC.--ACQUISITION OF OPERATING EASEMENT--GRAND TRUNK WESTERN RAILROAD COMPANY
FD-35724	CALIFORNIA HIGH-SPEED RAIL AUTHORITY--CONSTRUCTION EXEMPTION--IN MERCED, MADERA AND FRESNO COUNTIES, CAL.
FD-35756	HARTWELL RAILROAD COMPANY--CONSTRUCTION OF CONNECTING TRACK EXEMPTION--IN ELBERT COUNTY, GA.

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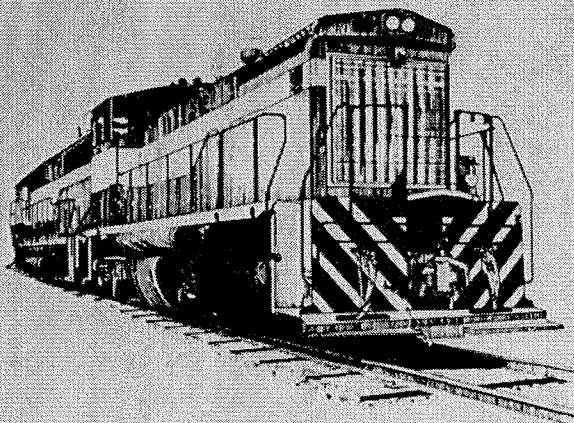
Coal Rate Guidelines — Nationwide

Final Environmental Impact Statement

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2012 COAL MOVEMENTS INCLUDED IN THE STB'S PUBLIC WAYBILL SAMPLE												
Miles	Origin BEA Area	OBEA	Destination BEA Area	TBEA	Cars	Tons	Revenue	Trains Per Day	5% Change	10% Change	15% Change	20% Change
2012 PWS Sorted and Summarized by Origin BEA Area												
257	Unknown	0	Unknown	0	64,665	7,095,768	\$77,759,772	3.00	0.15	0.30	0.45	0.60
550	Unknown	0	Richmond-Petersburg, VA	15	1,232	115,872	\$4,920,144	0.06	0.00	0.01	0.01	0.01
430	Unknown	0	Raleigh-Durham-Chapel Hill, NC	19	280	26,080	\$905,640	0.01	0.00	0.00	0.00	0.00
598	Unknown	0	Norfolk-VA Beach-Newport News, VA	20	796	80,209	\$2,510,626	0.04	0.00	0.00	0.01	0.01
510	Unknown	0	Macon, GA	38	101,232	11,906,308	\$300,664,868	4.70	0.24	0.47	0.71	0.94
414	Unknown	0	Knoxville, TN	44	13,503	1,584,905	\$37,231,729	0.63	0.03	0.06	0.09	0.13
168	Unknown	0	Charleston, WV-KY-OH	48	3,253	359,822	\$7,326,727	0.15	0.01	0.02	0.02	0.03
10	Unknown	0	Columbus, OH	51	11,593	1,313,317	\$7,418,608	0.54	0.03	0.05	0.08	0.11
277	Unknown	0	Cleveland-Akron, OH-PA	55	7,344	763,428	\$13,812,092	0.34	0.02	0.03	0.03	0.07
1,543	Unknown	0	Chicago-Gary-Kenosha, IL-IN-WI	64	9,254	1,219,622	\$23,250,968	0.43	0.02	0.04	0.06	0.09
480	Unknown	0	Birmingham, AL	78	120	11,580	\$348,072	0.01	0.00	0.00	0.00	0.00
340	Unknown	0	Little Rock-N. Little Rock, AR	90	404	39,592	\$1,209,148	0.02	0.00	0.00	0.00	0.00
310	Unknown	0	St. Louis, MO-IL	96	8,641	990,850	\$10,367,895	0.40	0.02	0.04	0.06	0.08
30	Unknown	0	Kansas City, MO-KS	99	10,482	1,231,702	\$1,359,312	0.49	0.02	0.05	0.07	0.10
68	Unknown	0	Davenport-Moline-Rock Island, IA-IL	102	44,116	5,281,342	\$20,260,244	2.05	0.10	0.20	0.31	0.41
100	Unknown	0	Duluth-Superior, MN-WI	109	400	36,880	\$471,760	0.02	0.00	0.00	0.00	0.00
48	Unknown	0	Bismark, ND-MT-SD	112	10,066	945,229	\$5,687,492	0.47	0.02	0.05	0.07	0.09
534	Unknown	0	Dallas-Ft. Worth, TX-AR-OK	127	1,536	150,528	\$3,924,464	0.07	0.00	0.01	0.01	0.01
500	Unknown	0	San Antonio, TX	134	488	46,848	\$2,524,868	0.02	0.00	0.00	0.00	0.00
150	Unknown	0	Tucson, AZ	150	3,058	362,308	\$1,538,986	0.14	0.01	0.01	0.02	0.03
350	Unknown	0	Total		292,463	33,562,190	\$523,493,415	13.58	0.68	1.36	2.04	2.72
292	State College, PA	9	Unknown	0	2,136	213,823	\$4,172,135	0.10	0.00	0.01	0.01	0.02
174	State College, PA	9	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	2,181	218,089	\$5,490,591	0.10	0.01	0.01	0.02	0.02
293	State College, PA	9	Washington-Baltimore, DC-MD-VA-WV-PA	13	39,641	4,026,356	\$82,805,638	1.84	0.09	0.18	0.28	0.37
580	State College, PA	9	Norfolk-VA Beach-Newport News, VA	20	12,474	1,257,578	\$23,518,760	0.58	0.03	0.06	0.09	0.12
450	State College, PA	9	Charleston, WV-KY-OH	48	2,210	233,620	\$3,059,998	0.10	0.01	0.01	0.02	0.02
453	State College, PA	9	Columbus, OH	51	3,791	379,389	\$7,882,954	0.18	0.01	0.02	0.03	0.04
105	State College, PA	9	Pittsburgh, PA-WV	53	9,092	953,925	\$12,293,393	0.42	0.02	0.04	0.06	0.08
290	State College, PA	9	Cleveland-Akron, OH-PA	55	1,309	132,672	\$2,439,956	0.06	0.00	0.01	0.01	0.01
535	State College, PA	9	Chicago-Gary-Kenosha, IL-IN-WI	64	4,904	541,373	\$10,839,314	0.23	0.01	0.02	0.03	0.05
341	State College, PA	9	Total		77,738	7,956,825	\$152,502,739	3.61	0.18	0.36	0.54	0.72
600	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	Unknown	0	1,423	138,643	\$7,497,938	0.07	0.00	0.01	0.01	0.01
600	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	Total		1,423	138,643	\$7,497,938	0.07	0.00	0.01	0.01	0.01
733	Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD	12	Unknown	0	3,073	303,630	\$18,801,022	0.14	0.01	0.01	0.02	0.03
733	Philadelphia-Wilmington-Atl. City, PA-NJ-DE-MD	12	Total		3,073	303,630	\$18,801,022	0.14	0.01	0.01	0.02	0.03
133	Washington-Baltimore, DC-MD-VA-WV-PA	13	Unknown	0	4,723	479,601	\$9,110,153	0.22	0.01	0.02	0.03	0.04
318	Washington-Baltimore, DC-MD-VA-WV-PA	13	Norfolk-VA Beach-Newport News, VA	20	4,788	518,337	\$11,150,234	0.22	0.01	0.02	0.03	0.04
229	Washington-Baltimore, DC-MD-VA-WV-PA	13	Total		9,511	997,938	\$20,260,407	0.44	0.02	0.04	0.07	0.09
419	Lexington, KY-TN-VA-WV	47	Unknown	0	109,277	12,119,105	\$243,110,916	5.07	0.25	0.51	0.76	1.01
627	Lexington, KY-TN-VA-WV	47	Buffalo-Niagara Falls, NY-PA	8	2,428	248,828	\$11,658,096	0.11	0.01	0.01	0.02	0.02
617	Lexington, KY-TN-VA-WV	47	Washington-Baltimore, DC-MD-VA-WV-PA	13	19,290	1,924,941	\$55,423,532	0.90	0.04	0.09	0.13	0.18
561	Lexington, KY-TN-VA-WV	47	Richmond-Petersburg, VA	15	14,166	1,567,178	\$32,675,437	0.66	0.03	0.07	0.10	0.13
277	Lexington, KY-TN-VA-WV	47	Roanoke, VA-NC-WV	17	17,355	1,886,037	\$46,917,867	0.81	0.04	0.08	0.12	0.16
383	Lexington, KY-TN-VA-WV	47	Raleigh-Durham-Chapel Hill, NC	19	39,807	4,561,107	\$76,720,440	1.85	0.09	0.18	0.28	0.37
489	Lexington, KY-TN-VA-WV	47	Norfolk-VA Beach-Newport News, VA	20	165,497	17,785,326	\$384,238,379	7.69	0.38	0.77	1.15	1.54
524	Lexington, KY-TN-VA-WV	47	Greenville, NC	21	2,273	235,305	\$8,020,150	0.11	0.01	0.01	0.02	0.02
403	Lexington, KY-TN-VA-WV	47	Charlottesville-Gastonia-Rock Hill, NC-SC	23	11,475	1,246,235	\$18,462,994	0.53	0.03	0.05	0.08	0.11
474	Lexington, KY-TN-VA-WV	47	Columbia, SC	24	20,878	2,366,951	\$54,472,207	0.97	0.05	0.10	0.15	0.19
609	Lexington, KY-TN-VA-WV	47	Wilmington, NC-SC	25	10,743	1,218,662	\$19,835,765	0.50	0.02	0.05	0.07	0.10
599	Lexington, KY-TN-VA-WV	47	Charleston-N. Charleston, SC	26	31,625	3,672,979	\$75,686,937	1.47	0.07	0.15	0.22	0.29
565	Lexington, KY-TN-VA-WV	47	Savannah, GA-SC	28	3,063	313,542	\$7,892,637	0.14	0.01	0.01	0.02	0.03

2012 COAL MOVEMENTS INCLUDED IN THE STB'S PUBLIC WAYBILL SAMPLE												
Miles	Origin BEA Area	OBEA	Destination BEA Area	TBEA	Cars	Tons	Revenue	Trains Per Day	5% Change	10% Change	15% Change	20% Change
727	Lexington, KY-TN-VA-WV	47	Jacksonville, FL-GA	29	6,620	769,365	\$15,167,562	0.31	0.02	0.03	0.05	0.06
545	Lexington, KY-TN-VA-WV	47	Macon, GA	38	13,118	1,503,616	\$29,727,854	0.61	0.03	0.06	0.09	0.12
417	Lexington, KY-TN-VA-WV	47	Atlanta, GA-AL-NC	40	61,069	7,050,164	\$138,645,147	2.84	0.14	0.28	0.43	0.57
201	Lexington, KY-TN-VA-WV	47	Knoxville, TN	44	1,358	154,234	\$2,025,666	0.06	0.00	0.01	0.01	0.01
157	Lexington, KY-TN-VA-WV	47	Charleston, WV-KY-OH	48	22,919	2,450,793	\$47,686,513	1.06	0.05	0.11	0.16	0.21
172	Lexington, KY-TN-VA-WV	47	Columbus, OH	51	20,803	2,141,733	\$39,865,755	0.97	0.05	0.10	0.14	0.19
387	Lexington, KY-TN-VA-WV	47	Cleveland-Akron, OH-PA	55	18,755	1,942,275	\$28,925,723	0.87	0.04	0.09	0.13	0.17
412	Lexington, KY-TN-VA-WV	47	Detroit-Ann Arbor-Flint, MI	57	22,583	2,669,835	\$58,934,857	1.05	0.05	0.10	0.16	0.21
557	Lexington, KY-TN-VA-WV	47	Chicago-Gary-Kenosha, IL-IN-WI	64	20,952	2,176,815	\$47,558,294	0.97	0.05	0.10	0.15	0.19
508	Lexington, KY-TN-VA-WV	47	Birmingham, AL	78	6,412	658,876	\$16,842,377	0.30	0.01	0.03	0.04	0.06
870	Lexington, KY-TN-VA-WV	47	Dallas-Ft. Worth, TX-AR-OK	127	156	15,012	\$214,436	0.01	0.00	0.00	0.00	0.00
448	Lexington, KY-TN-VA-WV	47	Total		642,622	70,678,914	\$1,460,709,541	29.84	1.49	2.98	4.48	5.97
414	Charleston, WV-KY-OH	48	Unknown	0	70,488	7,898,766	\$171,166,367	3.27	0.16	0.33	0.49	0.65
840	Charleston, WV-KY-OH	48	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	692	71,899	\$1,371,787	0.03	0.00	0.00	0.00	0.01
391	Charleston, WV-KY-OH	48	Washington-Baltimore, DC-MD-VA-WV-PA	13	32,626	3,566,312	\$63,354,439	1.52	0.08	0.15	0.23	0.30
443	Charleston, WV-KY-OH	48	Richmond-Petersburg, VA	15	5,061	550,923	\$13,617,955	0.24	0.01	0.02	0.04	0.05
285	Charleston, WV-KY-OH	48	Roanoke, VA-NC-WV	17	994	105,021	\$3,045,352	0.05	0.00	0.00	0.01	0.01
372	Charleston, WV-KY-OH	48	Raleigh-Durham-Chapel Hill, NC	19	28,172	3,270,895	\$46,707,684	1.31	0.07	0.13	0.20	0.26
488	Charleston, WV-KY-OH	48	Norfolk-VA Beach-Newport News, VA	20	270,308	31,043,270	\$488,906,328	12.55	0.63	1.26	1.88	2.51
507	Charleston, WV-KY-OH	48	Greenville, NC	21	1,800	206,277	\$3,212,324	0.08	0.00	0.01	0.01	0.02
483	Charleston, WV-KY-OH	48	Charlotte-Gastonia-Rock Hill, NC-SC	23	3,196	355,503	\$6,836,942	0.15	0.01	0.01	0.02	0.03
630	Charleston, WV-KY-OH	48	Columbia, SC	24	1,654	191,491	\$3,467,545	0.08	0.00	0.01	0.01	0.02
719	Charleston, WV-KY-OH	48	Charleston-N. Charleston, SC	26	2,488	290,130	\$5,761,074	0.12	0.01	0.01	0.02	0.02
770	Charleston, WV-KY-OH	48	Savannah, GA-SC	28	820	84,382	\$2,366,220	0.04	0.00	0.00	0.01	0.01
956	Charleston, WV-KY-OH	48	Jacksonville, FL-GA	29	1,386	161,227	\$3,286,201	0.06	0.00	0.01	0.01	0.01
95	Charleston, WV-KY-OH	48	Charleston, WV-KY-OH	48	38,865	4,406,052	\$57,433,458	1.80	0.09	0.18	0.27	0.36
158	Charleston, WV-KY-OH	48	Columbus, OH	51	14,221	1,469,411	\$29,717,686	0.66	0.03	0.07	0.10	0.13
430	Charleston, WV-KY-OH	48	Pittsburgh, PA-WV	53	270	27,561	\$878,577	0.01	0.00	0.00	0.00	0.00
369	Charleston, WV-KY-OH	48	Cleveland-Akron, OH-PA	55	9,073	921,326	\$14,436,224	0.42	0.02	0.04	0.06	0.08
390	Charleston, WV-KY-OH	48	Detroit-Ann Arbor-Flint, MI	57	4,356	508,437	\$9,247,807	0.20	0.01	0.02	0.03	0.04
557	Charleston, WV-KY-OH	48	Chicago-Gary-Kenosha, IL-IN-WI	64	12,610	1,265,075	\$29,124,615	0.59	0.03	0.06	0.09	0.12
757	Charleston, WV-KY-OH	48	Birmingham, AL	78	964	97,574	\$2,781,526	0.04	0.00	0.00	0.01	0.01
428	Charleston, WV-KY-OH	48	Total		500,044	56,491,532	\$956,720,111	23.22	1.16	2.32	3.48	4.64
10	Wheeling, WV	52	Unknown	0	92,367	11,505,987	\$50,801,274	4.29	0.21	0.43	0.64	0.86
330	Wheeling, WV	52	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	1,258	116,314	\$4,953,724	0.06	0.00	0.01	0.01	0.01
402	Wheeling, WV	52	Washington-Baltimore, DC-MD-VA-WV-PA	13	1,197	118,860	\$2,329,497	0.06	0.00	0.01	0.01	0.01
17	Wheeling, WV	52	Total		94,822	11,741,161	\$57,984,495	4.40	0.22	0.44	0.66	0.88
567	Pittsburgh, PA-WV	53	Unknown	0	58,636	6,444,554	\$129,885,326	2.72	0.14	0.27	0.41	0.54
380	Pittsburgh, PA-WV	53	Buffalo-Niagara Falls, NY-PA	8	2,814	310,428	\$7,407,476	0.13	0.01	0.01	0.02	0.03
341	Pittsburgh, PA-WV	53	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	22,100	2,509,804	\$35,909,691	1.03	0.05	0.10	0.15	0.21
468	Pittsburgh, PA-WV	53	Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD	12	6,639	716,448	\$20,609,624	0.31	0.02	0.03	0.05	0.06
380	Pittsburgh, PA-WV	53	Washington-Baltimore, DC-MD-VA-WV-PA	13	148,099	16,259,800	\$321,384,859	6.88	0.34	0.69	1.03	1.38
500	Pittsburgh, PA-WV	53	Richmond-Petersburg, VA	15	824	95,380	\$2,019,214	0.04	0.00	0.00	0.01	0.01
705	Pittsburgh, PA-WV	53	Raleigh-Durham-Chapel Hill, NC	19	4,384	508,868	\$12,985,612	0.20	0.01	0.02	0.03	0.04
753	Pittsburgh, PA-WV	53	Norfolk-VA Beach-Newport News, VA	20	3,962	413,633	\$10,978,174	0.18	0.01	0.02	0.03	0.04
783	Pittsburgh, PA-WV	53	Charlotte-Gastonia-Rock Hill, NC-SC	23	2,398	277,118	\$6,453,956	0.11	0.01	0.01	0.02	0.02
960	Pittsburgh, PA-WV	53	Columbia, SC	24	1,062	117,917	\$3,061,773	0.05	0.00	0.00	0.01	0.01
830	Pittsburgh, PA-WV	53	Charleston-N. Charleston, SC	26	15,430	1,787,637	\$40,868,076	0.72	0.04	0.07	0.11	0.14
260	Pittsburgh, PA-WV	53	Charleston, WV-KY-OH	48	4,851	534,111	\$10,048,656	0.23	0.01	0.02	0.03	0.05
138	Pittsburgh, PA-WV	53	Pittsburgh, PA-WV	53	75,908	8,127,862	\$138,314,202	3.52	0.18	0.35	0.53	0.70
241	Pittsburgh, PA-WV	53	Cleveland-Akron, OH-PA	55	27,061	3,032,995	\$62,995,237	1.26	0.06	0.13	0.19	0.25
431	Pittsburgh, PA-WV	53	Detroit-Ann Arbor-Flint, MI	57	3,576	421,656	\$10,583,778	0.17	0.01	0.02	0.02	0.03
549	Pittsburgh, PA-WV	53	Chicago-Gary-Kenosha, IL-IN-WI	64	3,282	395,062	\$7,359,350	0.15	0.01	0.02	0.02	0.03
383	Pittsburgh, PA-WV	53	Total		381,026	41,953,273	\$820,865,004	17.69	0.88	1.77	2.65	3.54

2012 COAL MOVEMENTS INCLUDED IN THE STB'S PUBLIC WAYBILL SAMPLE												
Miles	Origin BEA Area	OBEA	Destination BEA Area	TBEA	Cars	Tons	Revenue	Trains Per Day	5% Change	10% Change	15% Change	20% Change
239	Cleveland-Akron, OH	55	Unknown	0	11,667	1,248,548	\$23,633,511	0.54	0.03	0.05	0.08	0.11
344	Cleveland-Akron, OH	55	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	2,308	256,500	\$5,442,828	0.11	0.01	0.01	0.02	0.02
454	Cleveland-Akron, OH	55	Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD	12	435	44,694	\$1,403,862	0.02	0.00	0.00	0.00	0.00
140	Cleveland-Akron, OH	55	Pittsburgh, PA-WV	53	2,499	260,244	\$4,140,357	0.12	0.01	0.01	0.02	0.02
119	Cleveland-Akron, OH	55	Cleveland-Akron, OH-PA	55	1,620	187,080	\$3,636,220	0.08	0.00	0.01	0.01	0.02
233	Cleveland-Akron, OH	55	Total		18,529	1,997,066	\$38,258,778	0.86	0.04	0.09	0.13	0.17
163	Chicago-Gary-Kenosha, IL-IN-WI	64	Unknown	0	37,824	4,593,007	\$58,139,582	1.76	0.09	0.18	0.26	0.35
271	Chicago-Gary-Kenosha, IL-IN-WI	64	Detroit-Ann Arbor-Flint, MI	57	39,076	4,734,926	\$72,577,048	1.81	0.09	0.18	0.27	0.36
54	Chicago-Gary-Kenosha, IL-IN-WI	64	Chicago-Gary-Kenosha, IL-IN-WI	64	27,144	3,250,930	\$40,510,844	1.26	0.06	0.13	0.19	0.25
176	Chicago-Gary-Kenosha, IL-IN-WI	64	Total		104,044	12,578,863	\$171,227,474	4.83	0.24	0.48	0.72	0.97
278	Indianapolis, IN-IL	67	Unknown	0	19,123	2,066,577	\$22,616,683	0.89	0.04	0.09	0.13	0.18
440	Indianapolis, IN-IL	67	Detroit-Ann Arbor-Flint, MI	57	678	60,915	\$1,783,484	0.03	0.00	0.00	0.00	0.01
225	Indianapolis, IN-IL	67	Chicago-Gary-Kenosha, IL-IN-WI	64	10,484	1,248,798	\$9,533,680	0.49	0.02	0.05	0.07	0.10
61	Indianapolis, IN-IL	67	Indianapolis, IN-IL	67	66,004	7,087,130	\$54,941,775	3.06	0.15	0.31	0.46	0.61
500	Indianapolis, IN-IL	67	Wausau, WI	108	1,580	155,004	\$5,433,496	0.07	0.00	0.01	0.01	0.01
131	Indianapolis, IN-IL	67	Total		97,869	10,618,424	\$94,311,118	4.54	0.23	0.45	0.68	0.91
186	Evansville-Henderson, IN-KY-IL	69	Unknown	0	192,347	21,815,704	\$200,298,872	8.93	0.45	0.89	1.34	1.79
610	Evansville-Henderson, IN-KY-IL	69	Buffalo-Niagara Falls, NY-PA	8	2,880	326,475	\$6,619,678	0.13	0.01	0.01	0.02	0.03
767	Evansville-Henderson, IN-KY-IL	69	Columbia, SC	24	752	78,490	\$2,366,716	0.03	0.00	0.00	0.01	0.01
780	Evansville-Henderson, IN-KY-IL	69	Charleston-N. Charleston, SC	26	6,130	721,162	\$14,478,394	0.28	0.01	0.03	0.04	0.06
825	Evansville-Henderson, IN-KY-IL	69	Jacksonville, FL-GA	29	37,153	4,364,444	\$86,808,142	1.73	0.09	0.17	0.26	0.35
536	Evansville-Henderson, IN-KY-IL	69	Atlanta, GA-AL-NC	40	8,015	941,002	\$18,087,276	0.37	0.02	0.04	0.06	0.07
398	Evansville-Henderson, IN-KY-IL	69	Knoxville, TN	44	7,292	854,903	\$11,520,892	0.34	0.02	0.03	0.05	0.07
226	Evansville-Henderson, IN-KY-IL	69	Chicago-Gary-Kenosha, IL-IN-WI	64	2,852	339,350	\$1,834,828	0.13	0.01	0.01	0.02	0.03
82	Evansville-Henderson, IN-KY-IL	69	Indianapolis, IN-IL	67	3,211	337,046	\$2,013,289	0.15	0.01	0.01	0.02	0.03
66	Evansville-Henderson, IN-KY-IL	69	Paducah, KY-IL	72	3,231	360,334	\$2,196,738	0.15	0.01	0.02	0.02	0.03
558	Evansville-Henderson, IN-KY-IL	69	Birmingham, AL	78	1,359	159,330	\$1,766,534	0.06	0.00	0.01	0.01	0.01
760	Evansville-Henderson, IN-KY-IL	69	Wausau, WI	108	1,024	84,220	\$5,122,088	0.05	0.00	0.00	0.01	0.01
317	Evansville-Henderson, IN-KY-IL	69	Total		266,246	30,382,460	\$353,113,447	12.36	0.62	1.24	1.85	2.47
309	Birmingham, AL	78	Unknown	0	58,714	6,779,778	\$123,937,696	2.73	0.14	0.27	0.41	0.55
610	Birmingham, AL	78	Columbus, OH	51	1,062	103,595	\$1,733,669	0.05	0.00	0.00	0.01	0.01
940	Birmingham, AL	78	Chicago-Gary-Kenosha, IL-IN-WI	64	2,622	253,180	\$7,341,694	0.12	0.01	0.01	0.02	0.02
88	Birmingham, AL	78	Birmingham, AL	78	37,904	4,146,479	\$101,769,463	1.76	0.09	0.18	0.26	0.35
245	Birmingham, AL	78	Total		100,302	11,283,032	\$234,782,522	4.66	0.23	0.47	0.70	0.93
549	St. Louis, MO-IL	96	Unknown	0	104,810	12,400,838	\$183,076,410	4.87	0.24	0.49	0.73	0.97
860	St. Louis, MO-IL	96	Charlotte-Gastonia-Rock Hill, NC-SC	23	1,277	147,114	\$2,496,434	0.06	0.00	0.01	0.01	0.01
1,046	St. Louis, MO-IL	96	Charleston-N. Charleston, SC	26	4,712	554,685	\$12,099,390	0.22	0.01	0.02	0.03	0.04
634	St. Louis, MO-IL	96	Atlanta, GA-AL-NC	40	9,807	1,159,064	\$28,334,786	0.46	0.02	0.05	0.07	0.09
319	St. Louis, MO-IL	96	Chicago-Gary-Kenosha, IL-IN-WI	64	17,618	2,071,866	\$23,533,104	0.82	0.04	0.08	0.12	0.16
73	St. Louis, MO-IL	96	Paducah, KY-IL	72	32,261	3,781,324	\$24,181,500	1.50	0.07	0.15	0.22	0.30
76	St. Louis, MO-IL	96	St. Louis, MO-IL	96	12,091	1,343,082	\$11,363,778	0.56	0.03	0.06	0.08	0.11
570	St. Louis, MO-IL	96	Wausau, WI	108	804	80,088	\$3,290,340	0.04	0.00	0.00	0.01	0.01
433	St. Louis, MO-IL	96	Total		183,380	21,540,061	\$288,377,742	8.52	0.43	0.85	1.28	1.70
1,752	Denver-Boulder-Greeley, CO-KS-NE	141	Unknown	0	13,030	1,666,312	\$34,628,435	0.70	0.03	0.07	0.10	0.14
2,290	Denver-Boulder-Greeley, CO-KS-NE	141	Norfolk-VA Beach-Newport News, VA-NC	20	838	83,800	\$2,624,712	0.04	0.00	0.00	0.01	0.01
2,010	Denver-Boulder-Greeley, CO-KS-NE	141	Knoxville, TN	44	460	50,140	\$806,318	0.02	0.00	0.00	0.00	0.00
1,421	Denver-Boulder-Greeley, CO-KS-NE	141	Chicago-Gary-Kenosha, IL-IN-WI	64	6,757	750,685	\$8,868,469	0.31	0.02	0.03	0.05	0.06
1,484	Denver-Boulder-Greeley, CO-KS-NE	141	Paducah, KY-IL	72	61,311	6,855,878	\$200,469,219	2.85	0.14	0.28	0.43	0.57
1,870	Denver-Boulder-Greeley, CO-KS-NE	141	Birmingham, AL	78	810	94,908	\$1,590,149	0.04	0.00	0.00	0.01	0.01
1,327	Denver-Boulder-Greeley, CO-KS-NE	141	St. Louis, MO-IL	96	32,180	3,650,462	\$78,455,022	1.49	0.07	0.15	0.22	0.30
1,200	Denver-Boulder-Greeley, CO-KS-NE	141	Des Moines, IA-IL-MO	100	500	49,156	\$3,217,184	0.02	0.00	0.00	0.00	0.00

2012 COAL MOVEMENTS INCLUDED IN THE STB'S PUBLIC WAYBILL SAMPLE												
Miles	Origin BEA Area	OBEA	Destination BEA Area	TBEA	Cars	Tons	Revenue	Trains Per Day	5% Change	10% Change	15% Change	20% Change
1,050	Denver-Boulder-Greeley, CO-KS-NE	141	Omaha, NE-IA-MO	118	2,172	194,877	\$3,397,221	0.10	0.01	0.01	0.02	0.02
1,122	Denver-Boulder-Greeley, CO-KS-NE	141	Dallas-Ft. Worth, TX-AR-OK	127	1,484	148,350	\$5,432,890	0.07	0.00	0.01	0.01	0.01
1,274	Denver-Boulder-Greeley, CO-KS-NE	141	Houston-Galveston-Brazoria, TX	131	19,236	2,246,972	\$29,007,108	0.89	0.04	0.09	0.13	0.18
1,495	Denver-Boulder-Greeley, CO-KS-NE	141	San Antonio, TX	134	6,138	570,136	\$13,307,452	0.29	0.01	0.03	0.04	0.06
134	Denver-Boulder-Greeley, CO-KS-NE	141	Denver-Boulder-Greeley, CO-KS-NE	141	50,613	5,818,953	\$79,117,994	2.35	0.12	0.24	0.35	0.47
850	Denver-Boulder-Greeley, CO-KS-NE	141	Albuquerque, NM - AZ	156	210	23,334	\$825,820	0.01	0.00	0.00	0.00	0.00
1,330	Denver-Boulder-Greeley, CO-KS-NE	141	Tucson, AZ	159	2,730	321,804	\$5,150,510	0.13	0.01	0.01	0.02	0.03
1,090	Denver-Boulder-Greeley, CO-KS-NE	141	Los Angeles-Riverside-Orange County, CA-AZ	160	12,660	1,260,246	\$23,051,528	0.59	0.03	0.06	0.09	0.12
1,102	Denver-Boulder-Greeley, CO-KS-NE	141	Total		213,129	23,786,013	\$489,950,031	9.90	0.49	0.99	1.48	1.98
971	Casper, WY-ID-UT	143	Unknown	0	807,489	93,591,625	\$1,532,304,064	37.50	1.87	3.75	5.62	7.50
1,626	Casper, WY-ID-UT	143	Buffalo-Niagara Falls, NY-PA	8	7,442	760,360	\$7,123,572	0.35	0.02	0.03	0.05	0.07
2,010	Casper, WY-ID-UT	143	Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD	12	222	26,000	\$603,738	0.01	0.00	0.00	0.00	0.00
1,962	Casper, WY-ID-UT	143	Washington-Baltimore, DC-MD-VA-WV-PA	13	3,110	360,638	\$5,817,878	0.14	0.01	0.01	0.02	0.03
1,600	Casper, WY-ID-UT	143	Pittsburgh, PA-WV	53	1,800	211,698	\$649,190	0.08	0.00	0.01	0.01	0.02
1,488	Casper, WY-ID-UT	143	Cleveland-Akron, OH-PA	55	1,198	141,386	\$2,162,134	0.06	0.00	0.01	0.01	0.01
1,426	Casper, WY-ID-UT	143	Detroit-Ann Arbor-Flint, MI	57	31,790	3,813,222	\$42,249,668	1.48	0.07	0.15	0.22	0.30
1,127	Casper, WY-ID-UT	143	Chicago-Gary-Kenosha, IL-IN-WI	64	260,248	31,382,533	\$585,237,286	12.08	0.60	1.21	1.81	2.42
1,253	Casper, WY-ID-UT	143	Paducah, KY-IL	72	203,048	24,330,802	\$405,076,916	9.43	0.47	0.94	1.41	1.89
1,542	Casper, WY-ID-UT	143	Birmingham, AL	78	100,232	11,876,176	\$302,330,840	4.65	0.23	0.47	0.70	0.93
1,240	Casper, WY-ID-UT	143	Little Rock-N Little Rock, AR	90	100,650	12,158,840	\$170,556,788	4.67	0.23	0.47	0.70	0.93
1,136	Casper, WY-ID-UT	143	St. Louis, MO-IL	96	383,868	45,882,216	\$933,449,526	17.83	0.89	1.78	2.67	3.57
826	Casper, WY-ID-UT	143	Kansas City, MO-KS	99	330,787	39,987,098	\$560,160,400	15.36	0.77	1.54	2.30	3.07
899	Casper, WY-ID-UT	143	Dcs Moines, IA-IL-MO	100	42,866	5,131,962	\$93,829,022	1.99	0.10	0.20	0.30	0.40
1,071	Casper, WY-ID-UT	143	Peoria-Pekin, IL	101	136,868	16,505,176	\$239,888,232	6.36	0.32	0.64	0.95	1.27
986	Casper, WY-ID-UT	143	Davenport-Moline-Rock Island, IA-IL	102	45,810	5,516,598	\$58,101,974	2.13	0.11	0.21	0.32	0.43
1,046	Casper, WY-ID-UT	143	Minneapolis-St. Paul, MN-WI-IA	107	46,982	5,383,482	\$126,383,706	2.18	0.11	0.22	0.33	0.44
1,216	Casper, WY-ID-UT	143	Wausau, WI	108	46,012	5,476,484	\$29,544,252	2.14	0.11	0.21	0.32	0.43
1,154	Casper, WY-ID-UT	143	Duluth-Superior, MN-WI	109	56,536	6,830,156	\$140,962,038	2.63	0.13	0.26	0.39	0.53
710	Casper, WY-ID-UT	143	Bismark, ND-MT-SD	112	3,900	394,888	\$7,570,068	0.18	0.01	0.02	0.03	0.04
930	Casper, WY-ID-UT	143	Fargo-Moorhead, ND-MN	113	1,928	226,432	\$7,555,384	0.09	0.00	0.01	0.01	0.02
667	Casper, WY-ID-UT	143	Omaha, NE-IA-MO	118	82,778	9,900,590	\$107,213,468	3.84	0.19	0.38	0.58	0.77
987	Casper, WY-ID-UT	143	Tulsa, OK-KS	124	141,798	17,072,568	\$269,016,982	6.58	0.33	0.66	0.99	1.32
1,345	Casper, WY-ID-UT	143	Dallas-Ft. Worth, TX-AR-OK	127	133,310	16,037,220	\$344,900,432	6.19	0.31	0.62	0.93	1.24
1,406	Casper, WY-ID-UT	143	Houston-Galveston-Brazoria, TX	131	223,470	27,183,466	\$531,116,012	10.38	0.52	1.04	1.56	2.08
1,462	Casper, WY-ID-UT	143	San Antonio, TX	134	74,118	9,002,480	\$194,512,922	3.44	0.17	0.34	0.52	0.69
384	Casper, WY-ID-UT	143	Denver-Boulder-Greeley, CO-KS-NE	141	46,799	5,338,399	\$63,234,910	2.17	0.11	0.22	0.33	0.43
124	Casper, WY-ID-UT	143	Casper, WY-ID-UT	143	114,815	13,382,299	\$80,764,621	5.33	0.27	0.53	0.80	1.07
271	Casper, WY-ID-UT	143	Billings, MT-WY	144	4,256	465,965	\$5,833,931	0.20	0.01	0.02	0.03	0.04
821	Casper, WY-ID-UT	143	Reno, NV-CA	151	9,125	1,071,416	\$18,051,701	0.42	0.02	0.04	0.06	0.08
1,090	Casper, WY-ID-UT	156	Albuquerque, NM-AZ	156	47,482	5,751,632	\$136,999,807	2.20	0.11	0.22	0.33	0.44
1,440	Casper, WY-ID-UT	143	Tucson, AZ	159	2,864	338,480	\$5,599,450	0.13	0.01	0.01	0.02	0.03
1,058	Casper, WY-ID-UT	143	Total		3,493,601	415,552,287	\$7,008,800,912	162.23	8.11	16.22	24.33	32.45
1,142	Billings, MT, WY	144	Unknown	0	90,042	10,791,507	\$202,880,392	4.18	0.21	0.42	0.63	0.84
1,660	Billings, MT, WY	144	Cleveland-Akron, OH-PA	55	1,870	222,398	\$2,118,574	0.09	0.00	0.01	0.01	0.02
1,276	Billings, MT, WY	144	Chicago-Gary-Kenosha, IL-IN-WI	64	6,216	718,408	\$12,695,612	0.29	0.01	0.03	0.04	0.06
795	Billings, MT, WY	144	Minneapolis-St. Paul, MN-WI-IA	107	15,780	1,893,818	\$44,340,380	0.73	0.04	0.07	0.11	0.15
1,002	Billings, MT, WY	144	Duluth-Superior, MN-WI	109	99,270	11,897,910	\$253,622,034	4.61	0.23	0.46	0.69	0.92
589	Billings, MT, WY	144	Bismark, ND-MT-SD	112	6,166	701,350	\$11,685,218	0.29	0.01	0.03	0.04	0.06
806	Billings, MT, WY	113	Fargo-Moorhead, ND-MN	113	4,040	466,274	\$12,176,448	0.19	0.01	0.02	0.03	0.04
340	Billings, MT, WY	144	Billings, MT, WY	144	832	94,856	\$2,727,278	0.04	0.00	0.00	0.01	0.01
1,260	Billings, MT, WY	144	Albuquerque, NM - AZ	156	4,544	549,448	\$14,198,492	0.21	0.01	0.02	0.03	0.04
1,045	Billings, MT, WY	144	Total		228,760	27,335,969	\$556,444,428	10.62	0.53	1.06	1.59	2.12

2012 COAL MOVEMENTS INCLUDED IN THE STB'S PUBLIC WAYBILL SAMPLE												
Miles	Origin BEA Area	OBEA	Destination BEA Area	TBEA	Cars	Tons	Revenue	Trains Per Day	5% Change	10% Change	15% Change	20% Change
276	Salt Lake City, Ogden, UT-ID	152	Unknown	0	35,306	4,148,854	\$32,535,461	1.64	0.08	0.16	0.25	0.33
1,625	Salt Lake City, Ogden, UT-ID	152	Paducah, KY-IL	72	412	41,074	\$1,434,498	0.02	0.00	0.00	0.00	0.00
1,431	Salt Lake City, Ogden, UT-ID	152	St. Louis, MO-IL	96	2,300	257,364	\$6,602,114	0.11	0.01	0.01	0.02	0.02
1,480	Salt Lake City, Ogden, UT-ID	152	Houston-Galveston-Brazoria, TX	131	2,500	290,618	\$6,111,362	0.12	0.01	0.01	0.02	0.02
488	Salt Lake City, Ogden, UT-ID	152	Reno, NV-CA	151	3,592	413,899	\$7,730,661	0.17	0.01	0.02	0.03	0.03
1,185	Salt Lake City, Ogden, UT-ID	152	Tucson, AZ	159	1,101	109,626	\$1,662,873	0.05	0.00	0.01	0.01	0.01
789	<u>Salt Lake City, Ogden, UT-ID</u>	152	<u>Los Angeles-Riverside-Orange County, CA-AZ</u>	160	20,675	2,227,919	\$24,948,548	0.96	0.05	0.10	0.14	0.19
547	Salt Lake City, Ogden, UT-ID	152	Total		65,886	7,489,354	\$81,025,517	3.06	0.15	0.31	0.46	0.61
147	Albuquerque, NM - AZ	156	Unknown	0	40,246	4,727,638	\$54,991,917	1.87	0.09	0.19	0.28	0.37
850	Albuquerque, NM - AZ	156	Dallas-Ft. Worth, TX-AR-OK	127	258	30,417	\$527,463	0.01	0.00	0.00	0.00	0.00
150	Albuquerque, NM - AZ	156	Albuquerque, NM - AZ	156	27,340	3,334,466	\$22,167,986	1.27	0.06	0.13	0.19	0.25
490	<u>Albuquerque, NM - AZ</u>	156	<u>Tucson, AZ</u>	159	470	55,432	\$828,010	0.02	0.00	0.00	0.00	0.00
153	Albuquerque, NM - AZ	156	Total		68,314	8,147,953	\$78,585,376	3.17	0.16	0.32	0.48	0.63
2012 PWS Sorted and Summarized by Destination BEA Area												
257	Unknown	0	Unknown	0	64,665	7,095,768	\$77,759,772	3.00	0.15	0.30	0.45	0.60
292	State College, PA	9	Unknown	0	2,136	213,823	\$4,172,135	0.10	0.00	0.01	0.01	0.02
600	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	0	Unknown	0	1,423	138,643	\$7,497,938	0.07	0.00	0.01	0.01	0.01
733	Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD	12	Unknown	0	3,073	303,630	\$18,801,022	0.14	0.01	0.01	0.02	0.03
133	Washington-Baltimore, DC-MD-VA-WV-PA	43	Unknown	0	4,723	479,601	\$9,110,153	0.22	0.01	0.02	0.03	0.04
419	Lexington, KY-TN-VA-WV	47	Unknown	0	109,277	12,119,105	\$243,110,916	5.07	0.25	0.51	0.76	1.01
414	Charleston, WV-KY-OH	48	Unknown	0	70,488	7,898,766	\$171,166,367	3.27	0.16	0.33	0.49	0.65
10	Wheeling, WV	52	Unknown	0	92,367	11,505,987	\$50,801,274	4.29	0.21	0.43	0.64	0.86
567	Pittsburgh, PA-WV	53	Unknown	0	58,636	6,444,554	\$129,883,326	2.72	0.14	0.27	0.41	0.54
239	Cleveland-Akron, OH	55	Unknown	0	11,667	1,248,548	\$23,635,511	0.54	0.03	0.05	0.08	0.11
163	Chicago-Gary-Kenosha, IL-IN-WI	64	Unknown	0	37,824	4,593,007	\$58,139,582	1.76	0.09	0.18	0.26	0.35
278	Indianapolis, IN-IL	67	Unknown	0	19,123	2,066,577	\$22,616,683	0.89	0.04	0.09	0.13	0.18
186	Evansville-Henderson, IN-KY-IL	69	Unknown	0	192,347	21,815,704	\$200,298,872	8.93	0.45	0.89	1.34	1.79
309	Birmingham, AL	78	Unknown	0	58,714	6,779,778	\$123,937,696	2.73	0.14	0.27	0.41	0.55
549	St. Louis, MO-IL	96	Unknown	0	104,810	12,400,838	\$183,076,410	4.87	0.24	0.49	0.73	0.97
1,752	Denver-Boulder-Greeley, CO-KS-NE	141	Unknown	0	15,030	1,666,312	\$34,628,435	0.70	0.03	0.07	0.10	0.14
971	Casper, WY-ID-UT	143	Unknown	0	807,489	93,591,625	\$1,532,304,064	37.50	1.87	3.75	5.62	7.50
1,142	Billings, MT, WY	144	Unknown	0	90,042	10,791,507	\$202,880,392	4.18	0.21	0.42	0.63	0.84
276	Salt Lake City, Ogden, UT-ID	152	Unknown	0	35,306	4,148,854	\$32,535,461	1.64	0.08	0.16	0.25	0.33
147	<u>Albuquerque, NM - AZ</u>	156	<u>Unknown</u>	0	40,246	4,727,638	\$54,991,917	1.87	0.09	0.19	0.28	0.37
652	Total		Unknown	0	1,819,386	210,030,265	\$3,181,349,926	84.49	4.22	8.45	12.67	16.90
627	Lexington, KY-TN-VA-WV	47	Buffalo-Niagara Falls, NY-PA	8	2,428	248,828	\$11,658,096	0.11	0.01	0.01	0.02	0.02
380	Pittsburgh, PA-WV	53	Buffalo-Niagara Falls, NY-PA	8	2,814	310,428	\$7,407,476	0.13	0.01	0.01	0.02	0.03
610	Evansville-Henderson, IN-KY-IL	69	Buffalo-Niagara Falls, NY-PA	8	2,880	326,475	\$6,619,678	0.13	0.01	0.01	0.02	0.03
1,626	<u>Casper, WY-ID-UT</u>	143	<u>Buffalo-Niagara Falls, NY-PA</u>	8	2,442	260,360	\$7,123,572	0.35	0.02	0.03	0.05	0.07
1,038	Total		Buffalo-Niagara Falls, NY-PA	8	15,564	1,646,091	\$32,808,822	0.72	0.04	0.07	0.11	0.14
174	State College, PA	9	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	2,181	218,089	\$5,490,591	0.10	0.01	0.01	0.02	0.02
840	Charleston, WV-KY-OH	48	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	692	71,899	\$1,371,787	0.03	0.00	0.00	0.00	0.01
341	Pittsburgh, PA-WV	53	New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	22,100	2,509,804	\$35,909,691	1.03	0.05	0.10	0.15	0.21
344	<u>Cleveland-Akron, OH</u>	55	<u>New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT</u>	10	2,308	256,500	\$5,442,828	0.11	0.01	0.01	0.02	0.02
341	Total		New York-N. NJ-LI, NY-NJ-CT-PA-MA-VT	10	27,281	3,056,292	\$48,214,897	1.27	0.06	0.13	0.19	0.25
468	Pittsburgh, PA-WV	53	Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD	12	6,639	716,448	\$20,609,624	0.31	0.02	0.03	0.05	0.06
454	Cleveland-Akron, OH	55	Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD	12	435	44,694	\$1,403,862	0.02	0.00	0.00	0.00	0.00
2,010	<u>Casper, WY-ID-UT</u>	143	<u>Philadelphia-Wilmington-Atlantic City, PA-NJ-DE-MD</u>	12	222	26,000	\$603,738	0.01	0.00	0.00	0.00	0.00
518	Total		Philadelphia-Wilmington-Atl. City, PA-NJ-DE-MD	12	7,296	787,142	\$22,617,224	0.34	0.02	0.03	0.05	0.07

2012 COAL MOVEMENTS INCLUDED IN THE STB'S PUBLIC WAYBILL SAMPLE												
Miles	Origin BEA Area	OBEA	Destination BEA Area	TBEA	Cars	Tons	Revenue	Trains Per Day	5% Change	10% Change	15% Change	20% Change
293	State College, PA	9	Washington-Baltimore, DC-MD-VA-WV-PA	13	39,641	4,026,356	\$82,805,638	1.84	0.09	0.18	0.28	0.37
617	Lexington, KY-TN-VA-WV	47	Washington-Baltimore, DC-MD-VA-WV-PA	13	19,290	1,924,941	\$55,423,532	0.90	0.04	0.09	0.13	0.18
391	Charleston, WV-KY-OH	48	Washington-Baltimore, DC-MD-VA-WV-PA	13	32,626	3,566,312	\$63,354,439	1.52	0.08	0.15	0.23	0.30
402	Wheeling, WV	52	Washington-Baltimore, DC-MD-VA-WV-PA	13	1,197	118,860	\$2,229,497	0.06	0.00	0.01	0.01	0.01
380	Pittsburgh, PA-WV	53	Washington-Baltimore, DC-MD-VA-WV-PA	13	148,099	16,259,800	\$321,384,859	6.88	0.34	0.69	1.03	1.38
1,962	Casper, WY-ID-UT	143	Washington-Baltimore, DC-MD-VA-WV-PA	13	3,110	360,638	\$5,817,878	0.14	0.01	0.01	0.02	0.03
407	Total		Washington-Baltimore, DC-MD-VA-WV-PA	13	243,963	26,256,907	\$531,015,843	11.33	0.57	1.13	1.70	2.27
550	Unknown	0	Richmond-Petersburg, VA	15	1,232	115,872	\$4,920,144	0.06	0.00	0.01	0.01	0.01
561	Lexington, KY-TN-VA-WV	47	Richmond-Petersburg, VA	15	14,166	1,567,178	\$32,675,437	0.66	0.03	0.07	0.10	0.13
443	Charleston, WV-KY-OH	48	Richmond-Petersburg, VA	15	5,061	550,923	\$13,617,955	0.24	0.01	0.02	0.04	0.05
500	Pittsburgh, PA-WV	53	Richmond-Petersburg, VA	15	824	95,380	\$2,019,214	0.04	0.00	0.00	0.01	0.01
530	Total		Richmond-Petersburg, VA	15	21,283	2,329,353	\$53,232,750	0.99	0.05	0.10	0.15	0.20
277	Lexington, KY-TN-VA-WV	47	Roanoke, VA-NC-WV	17	17,355	1,886,057	\$46,917,867	0.81	0.04	0.08	0.12	0.16
283	Charleston, WV-KY-OH	48	Roanoke, VA-NC-WV	17	994	105,021	\$3,045,352	0.05	0.00	0.00	0.01	0.01
277	Total		Roanoke, VA-NC-WV	17	18,349	1,991,058	\$49,963,219	0.85	0.04	0.09	0.13	0.17
430	Unknown	0	Raleigh-Durham-Chapel Hill, NC	19	280	26,080	\$905,640	0.01	0.00	0.00	0.00	0.00
383	Lexington, KY-TN-VA-WV	47	Raleigh-Durham-Chapel Hill, NC	19	39,807	4,561,107	\$76,720,440	1.85	0.09	0.18	0.28	0.37
372	Charleston, WV-KY-OH	48	Raleigh-Durham-Chapel Hill, NC	19	28,172	3,270,895	\$46,707,684	1.31	0.07	0.13	0.20	0.26
705	Pittsburgh, PA-WV	53	Raleigh-Durham-Chapel Hill, NC	19	4,384	508,868	\$12,985,612	0.20	0.01	0.02	0.03	0.04
399	Total		Raleigh-Durham-Chapel Hill, NC	19	72,643	8,366,950	\$137,319,376	3.37	0.17	0.34	0.51	0.67
598	Unknown	0	Norfolk-VA Beach-Newport News, VA-NC	20	796	80,209	\$2,510,626	0.04	0.00	0.00	0.01	0.01
580	State College, PA	9	Norfolk-VA Beach-Newport News, VA-NC	20	12,474	1,257,578	\$23,518,760	0.58	0.03	0.06	0.09	0.12
318	Washington-Baltimore, DC-MD-VA-WV-PA	13	Norfolk-VA Beach-Newport News, VA-NC	20	4,788	518,337	\$11,150,234	0.22	0.01	0.02	0.03	0.04
489	Lexington, KY-TN-VA-WV	47	Norfolk-VA Beach-Newport News, VA-NC	20	165,497	17,785,326	\$384,238,379	7.69	0.38	0.77	1.15	1.54
488	Charleston, WV-KY-OH	48	Norfolk-VA Beach-Newport News, VA-NC	20	270,308	31,043,270	\$488,906,328	12.55	0.63	1.26	1.88	2.51
733	Pittsburgh, PA-WV	53	Norfolk-VA Beach-Newport News, VA-NC	20	3,962	413,633	\$10,978,174	0.18	0.01	0.02	0.03	0.04
2,290	Denver-Boulder-Greeley, CO-KS-NE	141	Norfolk-VA Beach-Newport News, VA-NC	20	838	83,800	\$2,624,712	0.04	0.00	0.00	0.01	0.01
494	Total		Norfolk-VA Beach-Newport News, VA-NC	20	458,663	51,182,153	\$923,927,233	21.30	1.06	2.13	3.19	4.26
524	Lexington, KY-TN-VA-WV	47	Greenville, NC	21	2,273	235,305	\$8,020,150	0.11	0.01	0.01	0.02	0.02
507	Charleston, WV-KY-OH	48	Greenville, NC	21	1,800	206,277	\$3,212,324	0.08	0.00	0.01	0.01	0.02
516	Total		Greenville, NC	21	4,073	441,582	\$11,232,474	0.19	0.01	0.02	0.03	0.04
403	Lexington, KY-TN-VA-WV	47	Charlotte-Gastonia-Rock Hill, NC-SC	23	11,475	1,246,235	\$18,462,994	0.53	0.03	0.05	0.08	0.11
483	Charleston, WV-KY-OH	48	Charlotte-Gastonia-Rock Hill, NC-SC	23	3,196	355,503	\$6,836,942	0.15	0.01	0.01	0.02	0.03
783	Pittsburgh, PA-WV	53	Charlotte-Gastonia-Rock Hill, NC-SC	23	2,398	277,118	\$6,453,956	0.11	0.01	0.01	0.02	0.02
860	St. Louis, MO-IL	96	Charlotte-Gastonia-Rock Hill, NC-SC	23	1,277	147,114	\$2,496,434	0.06	0.00	0.01	0.01	0.01
502	Total		Charlotte-Gastonia-Rock Hill, NC-SC	23	18,346	2,025,970	\$34,250,326	0.85	0.04	0.09	0.13	0.17
474	Lexington, KY-TN-VA-WV	47	Columbia, SC	24	20,878	2,366,951	\$54,472,207	0.97	0.05	0.10	0.15	0.19
630	Charleston, WV-KY-OH	48	Columbia, SC	24	1,654	191,491	\$3,467,545	0.08	0.00	0.01	0.01	0.02
960	Pittsburgh, PA-WV	53	Columbia, SC	24	1,062	117,917	\$3,061,773	0.05	0.00	0.00	0.01	0.01
767	Evansville-Henderson, IN-KY-IL	69	Columbia, SC	24	752	78,490	\$2,366,716	0.03	0.00	0.00	0.01	0.01
514	Total		Columbia, SC	24	24,346	2,754,849	\$63,368,241	1.13	0.06	0.11	0.17	0.23
609	Lexington, KY-TN-VA-WV	47	Wilmington, NC-SC	25	10,743	1,218,662	\$19,835,765	0.50	0.02	0.05	0.07	0.10
609	Total		Wilmington, NC-SC	25	10,743	1,218,662	\$19,835,765	0.50	0.02	0.05	0.07	0.10
599	Lexington, KY-TN-VA-WV	47	Charleston-N, Charleston, SC	26	31,625	3,672,979	\$75,686,937	1.47	0.07	0.15	0.22	0.29
719	Charleston, WV-KY-OH	48	Charleston-N, Charleston, SC	26	2,488	290,130	\$5,761,074	0.12	0.01	0.01	0.02	0.02
830	Pittsburgh, PA-WV	53	Charleston-N, Charleston, SC	26	15,430	1,787,637	\$40,868,076	0.72	0.04	0.07	0.11	0.14
780	Evansville-Henderson, IN-KY-IL	69	Charleston-N, Charleston, SC	26	6,130	721,162	\$14,478,394	0.28	0.01	0.03	0.04	0.06
1,046	St. Louis, MO-IL	96	Charleston-N, Charleston, SC	26	4,712	554,685	\$12,099,390	0.22	0.01	0.02	0.03	0.04
716	Total		Charleston-N, Charleston, SC	26	60,385	7,026,593	\$148,893,871	2.80	0.14	0.28	0.42	0.56

2012 COAL MOVEMENTS INCLUDED IN THE STB'S PUBLIC WAYBILL SAMPLE												
Miles	Origin BEA Area	OBEA	Destination BEA Area	TBEA	Cars	Tons	Revenue	Trains Per Day	5% Change	10% Change	15% Change	20% Change
563	Lexington, KY-TN-VA-WV	47	Savannah, GA-SC	28	3,063	312,542	\$7,892,637	0.14	0.01	0.01	0.02	0.03
770	Charleston, WV-KY-OH	48	Savannah, GA-SC	28	820	84,382	\$2,366,220	0.04	0.00	0.00	0.01	0.01
609	Total		Savannah, GA-SC	28	3,883	397,924	\$10,258,857	0.18	0.01	0.02	0.03	0.04
727	Lexington, KY-TN-VA-WV	47	Jacksonville, FL-GA	29	6,620	769,365	\$15,167,562	0.31	0.02	0.03	0.05	0.06
936	Charleston, WV-KY-OH	48	Jacksonville, FL-GA	29	1,386	161,227	\$3,286,201	0.06	0.00	0.01	0.01	0.01
825	Evansville-Henderson, IN-KY-IL	69	Jacksonville, FL-GA	29	37,153	4,364,444	\$86,808,142	1.73	0.09	0.17	0.26	0.35
815	Total		Jacksonville, FL-GA	29	45,159	5,295,036	\$105,261,905	2.10	0.10	0.21	0.31	0.42
510	Unknown	0	Macon, GA	38	101,232	11,906,308	\$300,664,868	4.70	0.24	0.47	0.71	0.94
545	Lexington, KY-TN-VA-WV	47	Macon, GA	38	13,118	1,503,616	\$29,727,854	0.61	0.03	0.06	0.09	0.12
514	Total		Macon, GA	38	114,350	13,409,924	\$330,392,722	5.31	0.27	0.53	0.80	1.06
417	Lexington, KY-TN-VA-WV	47	Atlanta, GA-AL-NC	40	61,069	7,050,164	\$138,645,147	2.84	0.14	0.28	0.43	0.57
536	Evansville-Henderson, IN-KY-IL	69	Atlanta, GA-AL-NC	40	8,015	941,002	\$18,087,276	0.37	0.02	0.04	0.06	0.07
634	St. Louis, MO-IL	96	Atlanta, GA-AL-NC	40	9,807	1,159,064	\$28,334,786	0.46	0.02	0.05	0.07	0.09
457	Total		Atlanta, GA-AL-NC	40	78,891	9,150,230	\$185,067,209	3.66	0.18	0.37	0.55	0.73
414	Unknown	0	Knoxville, TN	44	13,503	1,584,905	\$37,231,729	0.63	0.03	0.06	0.09	0.13
201	Lexington, KY-TN-VA-WV	47	Knoxville, TN	44	1,358	154,234	\$2,025,666	0.06	0.00	0.01	0.01	0.01
398	Evansville-Henderson, IN-KY-IL	69	Knoxville, TN	44	7,292	854,903	\$11,520,892	0.34	0.02	0.03	0.05	0.07
2,010	Denver-Boulder-Greeley, CO-KS-NE	141	Knoxville, TN	44	460	50,140	\$806,318	0.02	0.00	0.00	0.00	0.00
427	Total		Knoxville, TN	44	22,613	2,644,182	\$51,584,605	1.05	0.05	0.11	0.16	0.21
168	Unknown	0	Charleston, WV-KY-OH	48	3,253	359,822	\$7,326,727	0.15	0.01	0.02	0.02	0.03
450	State College, PA	9	Charleston, WV-KY-OH	48	2,210	233,620	\$3,059,998	0.10	0.01	0.01	0.02	0.02
157	Lexington, KY-TN-VA-WV	47	Charleston, WV-KY-OH	48	22,919	2,450,793	\$47,686,513	1.06	0.05	0.11	0.16	0.21
95	Charleston, WV-KY-OH	48	Charleston, WV-KY-OH	48	38,865	4,406,052	\$57,433,458	1.80	0.09	0.18	0.27	0.36
260	Pittsburgh, PA-WV	53	Charleston, WV-KY-OH	48	4,851	534,111	\$10,048,656	0.23	0.01	0.02	0.03	0.05
139	Total		Charleston, WV-KY-OH	48	72,098	7,984,398	\$125,555,352	3.35	0.17	0.33	0.50	0.67
10	Unknown	0	Columbus, OH	51	11,593	1,313,317	\$7,418,608	0.54	0.03	0.05	0.08	0.11
453	State College, PA	9	Columbus, OH	51	3,791	379,389	\$7,882,954	0.18	0.01	0.02	0.03	0.04
172	Lexington, KY-TN-VA-WV	47	Columbus, OH	51	20,803	2,141,733	\$39,865,755	0.97	0.05	0.10	0.14	0.19
158	Charleston, WV-KY-OH	48	Columbus, OH	51	14,221	1,460,411	\$29,717,686	0.66	0.03	0.07	0.10	0.13
610	Birmingham, AL	78	Columbus, OH	51	1,062	102,595	\$1,733,669	0.05	0.00	0.00	0.01	0.01
157	Total		Columbus, OH	51	51,470	5,407,445	\$86,618,672	2.39	0.12	0.24	0.36	0.48
105	State College, PA	9	Pittsburgh, PA-WV	53	9,092	953,925	\$12,293,393	0.42	0.02	0.04	0.06	0.08
430	Charleston, WV-KY-OH	48	Pittsburgh, PA-WV	53	270	27,561	\$878,577	0.01	0.00	0.00	0.00	0.00
138	Pittsburgh, PA-WV	53	Pittsburgh, PA-WV	53	75,908	8,127,862	\$138,314,202	3.52	0.18	0.35	0.53	0.70
140	Cleveland-Akron, OH	55	Pittsburgh, PA-WV	53	2,499	260,244	\$4,140,357	0.12	0.01	0.01	0.02	0.02
1,600	Casper, WY-ID-UT	143	Pittsburgh, PA-WV	53	1,800	211,698	\$649,190	0.08	0.00	0.01	0.01	0.02
168	Total		Pittsburgh, PA-WV	53	89,569	9,581,290	\$156,275,719	4.16	0.21	0.42	0.62	0.83
277	Unknown	0	Cleveland-Akron, OH-PA	55	7,344	763,428	\$13,812,092	0.34	0.02	0.03	0.05	0.07
290	State College, PA	9	Cleveland-Akron, OH-PA	55	1,309	132,672	\$2,439,956	0.06	0.00	0.01	0.01	0.01
387	Lexington, KY-TN-VA-WV	47	Cleveland-Akron, OH-PA	55	18,755	1,942,275	\$28,925,723	0.87	0.04	0.09	0.13	0.17
369	Charleston, WV-KY-OH	48	Cleveland-Akron, OH-PA	55	9,073	921,326	\$14,436,224	0.42	0.02	0.04	0.06	0.08
241	Pittsburgh, PA-WV	53	Cleveland-Akron, OH-PA	55	27,061	3,032,995	\$62,995,237	1.26	0.06	0.13	0.19	0.25
119	Cleveland-Akron, OH	55	Cleveland-Akron, OH-PA	55	1,620	187,080	\$3,636,220	0.08	0.00	0.01	0.01	0.02
1,488	Casper, WY-ID-UT	143	Cleveland-Akron, OH-PA	55	1,198	141,386	\$2,162,134	0.06	0.00	0.01	0.01	0.01
1,660	Billings, MT, WY	144	Cleveland-Akron, OH-PA	55	1,870	222,398	\$2,118,574	0.09	0.00	0.01	0.01	0.02
364	Total		Cleveland-Akron, OH-PA	55	68,230	7,343,560	\$130,526,160	3.17	0.16	0.32	0.48	0.63

2012 COAL MOVEMENTS INCLUDED IN THE STB'S PUBLIC WAYBILL SAMPLE												
Miles	Origin BEA Area	OBEA	Destination BEA Area	TBEA	Cars	Tons	Revenue	Trains Per Day	5% Change	10% Change	15% Change	20% Change
412	Lexington, KY-TN-VA-WV	47	Detroit-Ann Arbor-Flint, MI	57	22,583	2,669,835	\$58,934,857	1.05	0.05	0.10	0.16	0.21
390	Charleston, WV-KY-OH	48	Detroit-Ann Arbor-Flint, MI	57	4,356	508,437	\$9,247,807	0.20	0.01	0.02	0.03	0.04
431	Pittsburgh, PA-WV	53	Detroit-Ann Arbor-Flint, MI	57	3,576	421,656	\$10,583,778	0.17	0.01	0.02	0.02	0.03
271	Chicago-Gary-Kenosha, IL-IN-WI	64	Detroit-Ann Arbor-Flint, MI	57	39,076	4,734,926	\$72,577,048	1.81	0.09	0.18	0.27	0.36
440	Indianapolis, IN-IL	67	Detroit-Ann Arbor-Flint, MI	57	678	60,915	\$1,783,484	0.03	0.00	0.00	0.00	0.01
1,426	Casper, WY-ID-UT	143	Detroit-Ann Arbor-Flint, MI	57	31,790	3,813,222	\$42,249,668	1.48	0.07	0.15	0.22	0.30
674	Total		Detroit-Ann Arbor-Flint, MI	57	102,059	12,208,991	\$195,376,642	4.74	0.24	0.47	0.71	0.95
1,543	Unknown	0	Chicago-Gary-Kenosha, IL-IN-WI	64	9,254	1,219,622	\$23,250,968	0.43	0.02	0.04	0.06	0.09
555	State College, PA	9	Chicago-Gary-Kenosha, IL-IN-WI	64	4,904	541,373	\$10,839,314	0.23	0.01	0.02	0.03	0.05
557	Lexington, KY-TN-VA-WV	47	Chicago-Gary-Kenosha, IL-IN-WI	64	20,952	2,176,815	\$47,558,294	0.97	0.05	0.10	0.15	0.19
557	Charleston, WV-KY-OH	48	Chicago-Gary-Kenosha, IL-IN-WI	64	12,610	1,265,075	\$29,124,615	0.59	0.03	0.06	0.09	0.12
549	Pittsburgh, PA-WV	53	Chicago-Gary-Kenosha, IL-IN-WI	64	3,282	395,062	\$7,359,350	0.15	0.01	0.02	0.02	0.03
54	Chicago-Gary-Kenosha, IL-IN-WI	64	Chicago-Gary-Kenosha, IL-IN-WI	64	27,144	3,250,930	\$40,510,844	1.26	0.06	0.13	0.19	0.25
225	Indianapolis, IN-IL	67	Chicago-Gary-Kenosha, IL-IN-WI	64	10,484	1,248,798	\$9,535,680	0.49	0.02	0.05	0.07	0.10
226	Evansville-Henderson, IN-KY-IL	69	Chicago-Gary-Kenosha, IL-IN-WI	64	2,852	339,350	\$1,834,828	0.13	0.01	0.01	0.02	0.03
940	Birmingham, AL	78	Chicago-Gary-Kenosha, IL-IN-WI	64	2,622	253,180	\$7,341,694	0.12	0.01	0.01	0.02	0.02
319	St. Louis, MO-IL	96	Chicago-Gary-Kenosha, IL-IN-WI	64	17,618	2,071,866	\$23,535,104	0.82	0.04	0.08	0.12	0.16
1,421	Denver-Boulder-Greeley, CO-KS-NE	141	Chicago-Gary-Kenosha, IL-IN-WI	64	6,757	750,685	\$8,868,469	0.31	0.02	0.03	0.05	0.06
1,127	Casper, WY-ID-UT	143	Chicago-Gary-Kenosha, IL-IN-WI	64	260,248	31,382,533	\$585,237,286	12.08	0.60	1.21	1.81	2.42
1,276	Billings, MT, WY	144	Chicago-Gary-Kenosha, IL-IN-WI	64	6,216	718,408	\$12,695,612	0.29	0.01	0.03	0.04	0.06
945	Total		Chicago-Gary-Kenosha, IL-IN-WI	64	384,943	45,613,697	\$807,692,058	17.88	0.89	1.79	2.68	3.58
61	Indianapolis, IN-IL	67	Indianapolis, IN-IL	67	66,004	7,087,130	\$54,941,775	3.06	0.15	0.31	0.46	0.61
82	Evansville-Henderson, IN-KY-IL	69	Indianapolis, IN-IL	67	3,211	337,046	\$2,013,289	0.15	0.01	0.01	0.02	0.03
62	Total		Indianapolis, IN-IL	67	69,215	7,424,176	\$56,955,064	3.21	0.16	0.32	0.48	0.64
66	Evansville-Henderson, IN-KY-IL	69	Paducah, KY-IL	72	3,231	360,334	\$2,196,738	0.15	0.01	0.02	0.02	0.03
73	St. Louis, MO-IL	96	Paducah, KY-IL	72	32,261	3,781,324	\$24,181,500	1.50	0.07	0.15	0.22	0.30
1,484	Denver-Boulder-Greeley, CO-KS-NE	141	Paducah, KY-IL	72	61,311	6,855,878	\$200,469,219	2.85	0.14	0.28	0.43	0.57
1,253	Casper, WY-ID-UT	143	Paducah, KY-IL	72	203,408	24,330,802	\$405,076,916	9.43	0.47	0.94	1.41	1.89
1,625	Salt Lake City, Ogden, UT-ID	152	Paducah, KY-IL	72	412	41,074	\$1,434,498	0.02	0.00	0.00	0.00	0.00
1,160	Total		Paducah, KY-IL	72	300,263	35,369,412	\$633,358,871	13.94	0.70	1.39	2.09	2.79
480	Unknown	0	Birmingham, AL	78	120	11,580	\$348,072	0.01	0.00	0.00	0.00	0.00
508	Lexington, KY-TN-VA-WV	47	Birmingham, AL	78	6,412	658,876	\$16,842,377	0.30	0.01	0.03	0.04	0.06
757	Charleston, WV-KY-OH	48	Birmingham, AL	78	964	97,574	\$2,781,526	0.04	0.00	0.00	0.01	0.01
558	Evansville-Henderson, IN-KY-IL	69	Birmingham, AL	78	1,359	159,330	\$1,766,534	0.06	0.00	0.01	0.01	0.01
88	Birmingham, AL	78	Birmingham, AL	78	37,904	4,146,479	\$101,769,463	1.76	0.09	0.18	0.26	0.35
1,870	Denver-Boulder-Greeley, CO-KS-NE	141	Birmingham, AL	78	810	94,908	\$1,590,149	0.04	0.00	0.00	0.01	0.01
1,542	Casper, WY-ID-UT	143	Birmingham, AL	78	100,232	11,876,176	\$302,330,840	4.65	0.23	0.47	0.70	0.93
1,135	Total		Birmingham, AL	78	147,801	17,044,923	\$427,428,961	6.86	0.34	0.69	1.03	1.37
340	Unknown	0	Little Rock-N. Little Rock, AR	90	404	39,592	\$1,209,148	0.02	0.00	0.00	0.00	0.00
1,240	Casper, WY-ID-UT	143	Little Rock-N. Little Rock, AR	90	100,650	12,158,840	\$170,556,788	4.67	0.23	0.47	0.70	0.93
1,238	Total		Little Rock-N. Little Rock, AR	90	101,054	12,198,432	\$171,765,936	4.69	0.23	0.47	0.70	0.94
310	Unknown	0	St. Louis, MO-IL	96	8,641	990,850	\$10,367,895	0.40	0.02	0.04	0.06	0.08
76	St. Louis, MO-IL	96	St. Louis, MO-IL	96	12,091	1,345,082	\$11,363,778	0.56	0.03	0.06	0.08	0.11
1,327	Denver-Boulder-Greeley, CO-KS-NE	96	St. Louis, MO-IL	96	32,180	3,650,462	\$78,455,022	1.49	0.07	0.15	0.22	0.30
1,136	Casper, WY-ID-UT	143	St. Louis, MO-IL	96	383,868	45,882,216	\$933,449,526	17.83	0.89	1.78	2.67	3.57
1,431	Salt Lake City, Ogden, UT-ID	152	St. Louis, MO-IL	96	2,300	257,364	\$6,602,114	0.11	0.01	0.01	0.02	0.02
1,108	Total		St. Louis, MO-IL	96	439,080	52,125,974	\$1,040,238,335	20.39	1.02	2.04	3.06	4.08
30	Unknown	0	Kansas City, MO-KS	99	10,482	1,231,702	\$1,359,312	0.49	0.02	0.05	0.07	0.10
826	Casper, WY-ID-UT	143	Kansas City, MO-KS	99	330,787	39,987,098	\$560,160,400	15.36	0.77	1.54	2.30	3.07
802	Total		Kansas City, MO-KS	99	341,269	41,218,800	\$561,519,712	15.85	0.79	1.58	2.38	3.17

2012 COAL MOVEMENTS INCLUDED IN THE STB'S PUBLIC WAYBILL SAMPLE												
Miles	Origin BEA Area	OBEA	Destination BEA Area	TBEA	Cars	Tons	Revenue	Trains Per Day	5% Change	10% Change	15% Change	20% Change
1,200 899 902	Denver-Boulder-Greeley, CO-KS-NE Casper, WY-ID-UT Total	141 143 143	Des Moines, IA-IL-MO Des Moines, IA-IL-MO Des Moines, IA-IL-MO	100 100 100	500 42,866 43,366	49,156 5,131,962 5,181,118	\$3,217,184 \$93,829,022 \$97,046,206	0.02 1.99 2.01	0.00 0.10 0.10	0.00 0.20 0.20	0.00 0.30 0.30	0.00 0.40 0.40
1,071 1,071	Casper, WY-ID-UT Total	143 143	Peoria-Pekin, IL Peoria-Pekin, IL	101 101	136,868 136,868	16,505,176 16,505,176	\$239,888,232 \$239,888,232	6.36 6.36	0.32 0.32	0.64 0.64	0.95 0.95	1.27 1.27
68 986 537	Unknown Casper, WY-ID-UT Total	0 143 143	Davenport-Moline-Rock Island, IA-IL Davenport-Moline-Rock Island, IA-IL Davenport-Moline-Rock Island, IA-IL	102 102 102	44,116 45,810 89,926	5,281,342 5,516,598 10,797,940	\$20,260,244 \$58,101,974 \$78,362,218	2.05 2.13 4.18	0.10 0.11 0.21	0.20 0.21 0.42	0.31 0.32 0.63	0.41 0.43 0.84
1,046 795 981	Casper, WY-ID-UT Billings, MT, WY Total	143 144 144	Minneapolis-St. Paul, MN-WI-IA Minneapolis-St. Paul, MN-WI-IA Minneapolis-St. Paul, MN-WI-IA	107 107 107	46,982 15,780 62,762	5,383,482 1,893,818 7,277,300	\$126,383,706 \$44,340,380 \$170,724,086	2.18 0.73 2.91	0.11 0.04 0.15	0.22 0.07 0.29	0.33 0.11 0.44	0.44 0.15 0.58
500 760 570 1,216 1,182	Indianapolis, IN-IL Evansville-Henderson, IN-KY-IL St. Louis, MO-IL Casper, WY-ID-UT Total	67 69 96 143 143	Wausau, WI Wausau, WI Wausau, WI Wausau, WI Wausau, WI	108 108 108 108 108	1,580 1,024 804 46,012 49,420	155,004 84,220 80,088 5,476,484 5,795,796	\$5,433,496 \$5,122,088 \$3,290,340 \$29,344,252 \$43,390,176	0.07 0.05 0.04 2.14 2.29	0.00 0.00 0.00 0.11 0.11	0.01 0.00 0.00 0.21 0.23	0.01 0.01 0.01 0.32 0.34	0.01 0.01 0.01 0.43 0.46
100 1,154 1,002 1,055	Unknown Casper, WY-ID-UT Billings, MT, WY Total	0 143 144 144	Duluth-Superior, MN-WI Duluth-Superior, MN-WI Duluth-Superior, MN-WI Duluth-Superior, MN-WI	109 109 109 109	400 56,536 99,270 156,206	36,880 6,830,156 11,897,910 18,764,946	\$471,760 \$140,962,038 \$253,622,034 \$395,055,832	0.02 2.63 4.61 7.25	0.00 0.13 0.23 0.36	0.00 0.26 0.46 0.73	0.00 0.39 0.69 1.09	0.00 0.53 0.92 1.45
48 710 589 362	Unknown Casper, WY-ID-UT Billings, MT, WY Total	0 143 144 144	Bismark, ND-MT-SD Bismark, ND-MT-SD Bismark, ND-MT-SD Bismark, ND-MT-SD	112 112 112 112	10,066 3,900 6,166 20,132	945,229 394,888 701,350 2,041,467	\$5,687,492 \$7,570,068 \$11,685,218 \$24,942,778	0.47 0.18 0.29 0.93	0.02 0.01 0.01 0.05	0.05 0.02 0.03 0.09	0.07 0.03 0.04 0.14	0.09 0.04 0.06 0.19
930 806 847	Casper, WY-ID-UT Billings, MT, WY Total	143 144 144	Fargo-Moorhead, ND-MN Fargo-Moorhead, ND-MN Fargo-Moorhead, ND-MN	113 113 113	1,928 4,040 5,968	226,432 466,274 692,706	\$7,555,384 \$12,176,448 \$19,731,832	0.09 0.19 0.28	0.00 0.01 0.01	0.01 0.02 0.03	0.01 0.03 0.04	0.02 0.04 0.06
1,030 667 674	Denver-Boulder-Greeley, CO-KS-NE Casper, WY-ID-UT Total	141 143 143	Omaha, NE-IA-MO Omaha, NE-IA-MO Omaha, NE-IA-MO	118 118 118	2,172 82,778 84,950	194,877 9,900,590 10,095,467	\$3,397,221 \$107,213,468 \$110,610,689	0.10 3.84 3.94	0.01 0.19 0.20	0.01 0.38 0.39	0.02 0.58 0.59	0.02 0.77 0.79
987 987	Casper, WY-ID-UT Total	143 143	Tulsa, OK-KS Tulsa, OK-KS	124 124	141,798 141,798	17,072,568 17,072,568	\$269,016,982 \$269,016,982	6.58 6.58	0.33 0.33	0.66 0.66	0.99 0.99	1.32 1.32
334 870 1,122 1,345 850 1,332	Unknown Lexington, KY-TN-VA-WV Denver-Boulder-Greeley, CO-KS-NE Casper, WY-ID-UT Albuquerque, NM-AZ Total	0 47 141 143 156 156	Dallas-Ft. Worth, TX-AR-OK Dallas-Ft. Worth, TX-AR-OK Dallas-Ft. Worth, TX-AR-OK Dallas-Ft. Worth, TX-AR-OK Dallas-Ft. Worth, TX-AR-OK Dallas-Ft. Worth, TX-AR-OK	127 127 127 127 127 127	1,536 156 1,484 133,310 258 136,744	150,528 15,012 148,350 16,037,220 30,417 16,381,527	\$3,924,464 \$214,436 \$5,432,890 \$344,900,432 \$527,463 \$354,999,685	0.07 0.01 0.07 6.19 0.01 6.35	0.00 0.00 0.00 0.31 0.00 0.32	0.01 0.00 0.01 0.62 0.00 0.63	0.01 0.00 0.01 0.93 0.00 0.95	0.01 0.00 0.01 1.24 0.00 1.27
1,274 1,406 1,480 1,397	Denver-Boulder-Greeley, CO-KS-NE Casper, WY-ID-UT Salt Lake City, Ogden, UT-ID Total	141 143 152 152	Houston-Galveston-Brazoria, TX Houston-Galveston-Brazoria, TX Houston-Galveston-Brazoria, TX Houston-Galveston-Brazoria, TX	131 131 131 131	19,236 223,470 2,500 245,206	2,246,972 27,183,466 290,618 29,721,056	\$29,007,108 \$531,116,012 \$6,111,362 \$566,234,482	0.89 10.38 0.12 11.39	0.04 0.52 0.01 0.57	0.09 1.04 0.01 1.14	0.13 1.56 0.02 1.71	0.18 2.08 0.02 2.28
500 1,495 1,462 1,459	Unknown Denver-Boulder-Greeley, CO-KS-NE Casper, WY-ID-UT Total	0 141 143 143	San Antonio, TX San Antonio, TX San Antonio, TX San Antonio, TX	134 134 134 134	488 6,138 74,118 80,744	46,848 570,136 9,002,480 9,619,464	\$2,524,868 \$13,307,452 \$194,512,922 \$210,345,242	0.02 0.29 3.44 3.75	0.00 0.01 0.17 0.19	0.00 0.05 0.34 0.37	0.00 0.04 0.52 0.56	0.00 0.06 0.69 0.75

2012 COAL MOVEMENTS INCLUDED IN THE STB'S PUBLIC WAYBILL SAMPLE												
Miles	Origin BEA Area	OBEA	Destination BEA Area	TBEA	Cars	Tons	Revenue	Trains Per Day	5% Change	10% Change	15% Change	20% Change
821	Casper, WY-ID-UT	143	Reno, NV-CA	151	9,125	1,071,416	\$18,051,701	0.42	0.02	0.04	0.06	0.08
488	<u>Salt Lake City, Ogden, UT-ID</u>	152	<u>Reno, NV-CA</u>	151	3,592	413,899	\$7,730,661	0.17	0.01	0.02	0.03	0.05
728	Total		Reno, NV-CA	151	12,717	1,485,315	\$25,782,362	0.59	0.03	0.06	0.09	0.12
850	Denver-Boulder-Greeley, CO-KS-NE	141	Albuquerque, NM - AZ	156	210	23,334	\$825,820	0.01	0.00	0.00	0.00	0.00
1,090	Casper, WY-ID-UT	143	Albuquerque, NM-AZ	156	47,482	5,751,632	\$136,999,807	2.20	0.11	0.22	0.33	0.44
1,260	Billings, MT, WY	144	Albuquerque, NM - AZ	156	4,544	549,448	\$14,198,492	0.21	0.01	0.02	0.03	0.04
150	<u>Albuquerque, NM - AZ</u>	156	<u>Albuquerque, NM - AZ</u>	156	27,340	3,334,466	\$22,167,986	1.27	0.06	0.13	0.19	0.25
775	Total		Albuquerque, NM - AZ	156	79,576	9,658,880	\$174,192,105	3.70	0.18	0.37	0.55	0.74
150	Unknown	0	Tucson, AZ	159	3,058	362,308	\$1,538,986	0.14	0.01	0.01	0.02	0.03
1,330	Denver-Boulder-Greeley, CO-KS-NE	141	Tucson, AZ	159	2,730	321,804	\$5,150,510	0.13	0.01	0.01	0.02	0.03
1,440	Casper, WY-ID-UT	143	Tucson, AZ	159	2,864	338,480	\$5,399,450	0.13	0.01	0.01	0.02	0.03
1,185	Salt Lake City, Ogden, UT-ID	152	Tucson, AZ	159	1,101	109,626	\$1,662,873	0.05	0.00	0.01	0.01	0.01
490	<u>Albuquerque, NM - AZ</u>	156	<u>Tucson, AZ</u>	159	470	55,432	\$898,010	0.02	0.00	0.00	0.00	0.00
949	Total		Tucson, AZ	159	10,223	1,187,650	\$14,849,829	0.47	0.02	0.05	0.07	0.09
1,090	Denver-Boulder-Greeley, CO-KS-NE	141	Los Angeles-Riverside-Orange County, CA-AZ	160	12,660	1,260,246	\$23,051,528	0.59	0.03	0.06	0.09	0.12
789	<u>Salt Lake City, Ogden, UT-ID</u>	152	<u>Los Angeles-Riverside-Orange County, CA-AZ</u>	160	20,675	2,227,919	\$24,948,548	0.96	0.05	0.10	0.14	0.19
898	Total		Los Angeles-Riverside-Orange County, CA-AZ	160	33,335	3,488,165	\$48,000,076	1.55	0.08	0.15	0.23	0.31

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

DOCKET NO. EP 722

RAILROAD REVENUE ADEQUACY

DOCKET NO. EP 664 (SUB-NO. 2)

**PETITION OF THE WESTERN COAL TRAFFIC LEAGUE
TO INSTITUTE A RULEMAKING PROCEEDING TO
ABOLISH THE USE OF THE MULTI-STAGE DISCOUNTED CASH FLOW MODEL
IN DETERMINING THE RAILROAD INDUSTRY'S COST OF EQUITY CAPITAL**

**OPENING COMMENTS
OF
WESTERN ORGANIZATION OF RESOURCE COUNCILS INC AND NORTHERN
PLAINS RESOURCE COUNCIL INC.**

The Western Organization of Resource Councils Inc, and Northern Plains Resource Council Inc. (The Councils), respectfully submit the following comments in Dockets EP 722 and EP 664 (Sub-No.2) to request that the Surface Transportation Board (STB or Board) comply with the National Environmental Policy Act to evaluate potential significant environmental impacts of the decisions under consideration in these dockets. The Councils hereby endorse and fully incorporate the Comments filed by Friends of the Earth and the Verified Statement of Gerald Fauth. This rulemaking is likely to cause significant direct, indirect and cumulative impacts; the onus is on the STB to comply with NEPA and fully disclose and analyze those impacts before the Board can make a determination as to the merits of the petition. In addition, the Councils provide this statement of interest.

WESTERN ORGANIZATION OF RESOURCE COUNCILS INC. ("WORC"), a Montana non-profit corporation, is a regional network of grassroots community organizations that include 10,000 members and 35 local chapters. WORC's mission is to advance the vision of a democratic, sustainable, and just society through community action. WORC is committed to building sustainable environmental and economic communities that balance economic growth with the health of people and stewardship of their land, water, and air resources. From its creation in the 1970s, WORC has focused on coal mining issues and assisting its members and communities address the adverse impacts of mining.

WORC members live, travel, and recreate throughout Colorado, Wyoming, Montana, Idaho, Oregon, and North and South Dakota. They live in communities such as Gillette and Sheridan, Wyoming; Billings, Bozeman, and Helena, Montana; Sandpoint, Idaho; and Baker and LaGrande, Oregon, that would be adversely affected by increased coal rail traffic likely to occur as a result of this petition. These communities are divided by existing rail lines used to haul coal, and residents are affected by pollution, adverse health effects, noise, traffic congestion and disruption, and railroad crossing safety issues. Many WORC members are ranchers and farmers who have been adversely affected by delays, increased costs and reduced prices for grain because of the primacy rail carriers give to coal shipments. Increased traffic caused by the rule proposed in this petition would make all of these problems worse. The indirect impacts of this rule would likely include expanded coal mining in the Powder River Basin, affecting water resources air quality, social stability and the quality of life enjoyed and relied upon by our members in Montana and Wyoming. Finally, the climate change impacts of additional carbon pollution, impacts that are already occurring in all of the states where WORC member groups are based, particularly with respect to agriculture and water resources, will likely increase as a result

of this Petition.

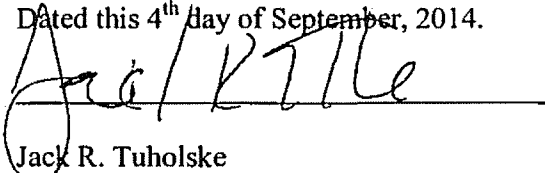
NORTHERN PLAINS RESOURCE COUNCIL INC. ("NPRC") is a Montana non-profit corporation, a member-based grassroots conservation and family agriculture group headquartered in Billings, Montana. For over forty years, NPRC has organized citizens to protect Montana's water quality, family farms and ranches, and unique quality of life. NPRC has a long history of involvement working for responsible coal mining. NPRC was formed in 1972 by ranchers and concerned citizens to address the impacts of strip mining and coal transport on rural people and communities in the Montana portion of the Powder River Basin. Since that time, NPRC has worked for the preservation and enrichment of the area's agricultural heritage and the responsible use of land, mineral, water, and air resources to sustain the livelihood of present and future generations. The organization has been involved on coal/rail issues for over 40 years.

NPRC members live, work, travel and recreate throughout Montana and the Northwest. They live in communities such as Billings, Missoula, Whitefish, Bozeman, Helena and Great Falls Montana, as well as communities in Idaho and Washington that are currently adversely affected by increased coal rail traffic, and will be further affected by the increases that are likely to occur as a result of this petition. These communities are bisected by existing coal traffic rail lines, and their residents suffer pollution, noise adverse health effects, safety effects, traffic disruptions, lack of safe crossings as a result of rail traffic. In addition, member farmers already experience delays in shipping grain because of the primacy rail carriers give to coal shipments. Any further increase in rail traffic caused by this rule will make these impacts worse. In addition members own farms and ranches that are also directly affected by rail traffic for the same reasons. Furthermore, the indirect and/or cumulative impacts of this rule are likely to lead to expanded

coal mining in the Powder River Basin affecting water resource, air quality, social stability and the quality of life. Furthermore the facilitation of increased coal transport will impact communities in Washington affected by proposed export terminals that will be served by the Petitioners. Finally, the climate change impacts of additional carbon pollution, impacts that are already occurring in Montana and the Northwest, particularly with respect to agriculture and water resources, will likely increase as a result of this Petition.

NPRC has a 40 year history of public participation and involvement in the NEPA process as it related to coal development in southeastern Montana. Moreover, NPRC members have a long and extensive participation history in STB NEPA proceedings. The failure of the Defendants to comply with NEPA herein deprives NPRC of its procedural rights to participate in government decisions, inform its members, advise elected officials, and carry forth its organizational purpose of protecting family farms and conservation values of the area.

Dated this 4th day of September, 2014.

A handwritten signature in black ink, appearing to read "Jack R. Tuholske", is written over a horizontal line.

Jack R. Tuholske
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Western Organization of Resource Councils.

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

DOCKET NO. EP 722

DOCKET NO. EP 664 (SUB-NO. 2)

RAILROAD REVENUE ADEQUACY

CERTIFICATE OF SERVICE

I certify that I have this day served copies of *Opening Comments of Friends of the Earth, Inc. (FoE)*, *Opening Verified Statement of Gerald W. Fauth III* supporting FoE's comments, and *Opening Comments of Western Organization of Resource Councils Inc., and Northern Plains Resource Council Inc.*, which join in FoE's opening comments, upon all parties of record in this proceeding, electronically and by first class mail on the 5th of September, 2014.

For Docket No. EP 722

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For Docket No. EP 664 (Sub-No. 2)

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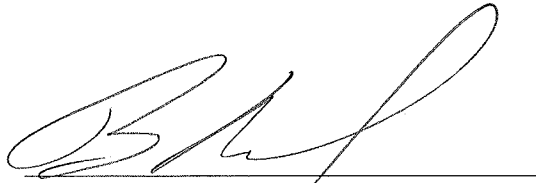
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A handwritten signature in black ink, appearing to read 'B. Dunkiel', written over a horizontal line.

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