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PACKET 1 ATTACHMENT

Michael L. Rosenthal Office of Proceedings
April 28, 2015
Part of
Public Record

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By Hand Delivery

April 22, 2015

Mr. William F. Huneke
Director & Chief Economist
Office of Economics
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

**Re: Waybill Access Request, FD 32760 (Sub-No. 46), BNSF Ry.
– Terminal Trackage Rights – Kansas City Southern Ry,
& Union Pacific R.R.**

Dear Mr. Huneke:

Pursuant to 49 C.F.R. § 1244.9(b)(4), Covington & Burling LLP (“Covington”), which is outside counsel for Union Pacific Railroad Company in the referenced proceeding, respectfully requests access to all fields identified in Attachment A from the STB Waybill Sample for Union Pacific, Southern Pacific, Kansas City Southern, and BNSF (including Burlington Northern and Atchison, Topeka & Santa Fe), for all traffic originating and terminating in the Lake Charles, Louisiana BEA (1995 BEA #86) for each of the years from 1994 through 2013. Union Pacific understands that the Board has previously granted access to the same data to counsel and consultants for BNSF.

The purpose of this request is to allow Union Pacific’s counsel and consultants to prepare verified statements to be submitted in proceedings before the Board. The requested data are relevant to issues pending before the Board, and the STB Waybill Sample is the only single source of the data. Obtaining the data from other sources would be burdensome and costly.

We are requesting that the Board grant access to waybill data to Covington and to the outside consulting firm Charles River Associates. Any evidence drawn from the STB Waybill Sample will be submitted to the Board in accordance with 49 C.F.R. § 1244.9(b)(4)(iv), and we will also comply with the Board’s other rules governing the release of waybill data.

Please contact the undersigned if you have any questions.

Sincerely,



Michael L. Rosenthal

Attachment A

1. Origin (Railroad, Station, and SPLC)
2. Termination (Railroad, Station and SPLC)
3. Interchange Points (Railroads and Rule 260 Junction codes)
4. Number of Carloads (Expanded and non-expanded)
5. Number of Trailers or Containers (Expanded and non-expanded)
6. Net Tons (Expanded and non-expanded)
7. Revenue Fields (Expanded and non-expanded)
8. AAR Cartype
9. Tare Weight
10. TOFC/COFC Plan
11. Commodity Code (With and without HAZMAT codes)
12. PTNM Network Node Numbers
13. Junction Frequency
14. Estimated Total Distance
15. Shortline Miles
16. Estimated Segment Distances
17. Expansion Factor
18. Transit Code
19. Waybill Number, Waybill Date, and Accounting Period
20. Equipment Initial and Number (Car, Trailer, and Container)
21. Import/Export Flag
22. Rebill Flag
23. Type Move via Water
24. Other fields that can be calculated or obtained from the above fields, such as Mileage Rate, Deregulation flag and date, BEA, Freight area, Freight territory, and URCS variable cost.