

RSTAC Measures & Metrics Sub-Group Recommendations

June 21, 2023

Thank you for giving us the opportunity to study the STB designated railroad operating metrics. The below recommendations are based on the varied experiences of the sub-group members and reflect our close review of the metrics.

We recommend removing the following metrics due to their redundancy in other metrics or not being beneficial for customers:

- EP 724 Metric 5: Trains Held
- EP 724 Metric 7: Grain Cars Loaded and Billed by State
- EP 724 Metric 9: Coal Loadings, Plan Vs. Performance
- EP 724 Metric 10: Grain Loadings, Plan Vs. Performance
- EP 770 Metric 2: Train Starts
- EP 770 Metric 3: Car Status

We have divided the metrics into two groups, one group contains metrics that are important for customers and the other contains railroad fluidity metrics that are important for understanding overall railroad network health. They are listed below with recommendations.

Customer Metrics:

EP 724 Metric 4: Dwell Time at Origin for Unit Trains

The regulatory text is sufficient. We suggest using a “Time at Customer” metric to see if there is a consistent correlation between “Release to Pull” and “Time at Customer”. There is some evidence of faster Release to Pull times as the Time at Customer decreases.

EP 724 Metric 6: Cars not Moved for 48-Plus

The Sub-Committee would like to expand this metric to include cars that have not moved for 24, 32, 48, 100, and 200+ hours.

EP 724 Metric 8: Outstanding Car Orders

We believe “past due” cars should be counted the day after an order was not filled with no grace period. This should eventually be rolled into a more comprehensive local service metric.

EP 770 Metric 6: Cancelled Local Trains

Cancelled/Annulled local trains with reasons is a very important data point to railroads and shippers. We think any railroad that does not have this metric should develop it. It can give railroads insight into how to fix service issues as well as giving shippers an estimate of how long the local service issues will last. We are requesting the STB’s assistance to help convince the industry to develop this metric. We also believe this should eventually be rolled into a more comprehensive local service metric.

EP 770 Metric 5: Industry Spot and Pull

We believe there should be a more comprehensive industry standard for a local service metric which would include the percentage of ordered car placements and pulls compared to the total number of car events requested from customers on the scheduled days of service in an industry standard time window (recommendation is 12 hours from the scheduled serving job’s scheduled on duty time). The work completed time should be based on the finished pull/place events and safe customer access to the placed cars. A cancelled/annulled job should count as 0% in this equation as none of the requested work was completed unless another job completed the same work within the recommended time window. It would also be helpful for the railroads to report the root cause data to track missed service (annulled, outside window, engine failure, blue flag, customer capacity, etc.). Any ordered car not pulled/placed or pulled/placed outside of the window will constitute a miss except customer related (blue flag,

customer capacity, etc). There should be a 5 day notice sent to affected customers when railroads change the scheduled on duty time of scheduled jobs.

- Open gate vs. closed gate rules:
 - Closed Gate (Spots): Measure % of cars ordered by customer vs. cars actually placed
 - Closed Gate (Pulls): Measure % of cars billed to release by established cut off vs. cars pulled.
 - Open Gate: Measure % of cars automatically ordered (does not include cars CP'd) vs. cars actually placed
 - Open Gate: Same as closed Gate.

EP 770 Metric 7: On-time Performance

This is the most important metric for customers, but also the most difficult to develop and standardize across the industry. We would like a standard metric for on time performance that would span the entire trip for a car across multiple carriers. Performance will have to be measured against the operating plan for each shipment and information would have to be shared between railroads. This is particularly difficult since car trip plans can flex to different circumstances and evolve as the operating plan changes, making coordination between railroads more challenging.

- We can start with each railroad independently developing an on-time performance metric if not already in place. There could be industry time standards around crew changes, set off, and pickup events.
- (Carload) Percent of measured cars destined for a customer that arrive at or ahead of the original estimated time of arrival, notification, or interchange.
- (Intermodal) Percent of measured containers destined for a customer that arrive at or ahead of the original estimated time of arrival, notification, or interchange.

Railroad Fluidity Metrics:

EP 724 Metric 1: Train Speed

We recommend changing velocity from line haul velocity between terminals to an origin – destination velocity. None of the current metrics include time lost at intermediate terminal locations which is the biggest source of train delay. A “beginning to end” velocity would capture that delay.

- Average train speed between origin and destination in miles per hour (does not include locals, yard jobs, work trains, or passenger trains).

EP 724 Metric 2: Terminal Dwell, System and Top 10 & EP 770 Metric 1: Terminal Dwell, 11 through 20

We recommend no changes to the regulatory text or metric.

EP 724 Metric 3: Cars on Line

We recommend no changes to the regulatory text or metric.

EP 724 Metric 11: Carloads Originated and Received

This should be a more comprehensive interchange metric. The interchange score can be the percent of cars offered or interchanged compared to the total number of cars scheduled for interchange. We would like to remove the ability to count any cars that were auto-offered across all railroads. It should measure similarly to FMLM with scheduled windows and scheduled days of service. The interchange windows and scheduled days of service should be based on ISA interchange agreement between railroads.

EP 770 Metric 4: Unplanned Recrews

We recommend no changes to the regulatory text or metric.

We also recommend adding two railroad fluidity metrics:

- On Time Originations (“Percent of on time departures for scheduled road trains at profiled origin +2 hours)
- On Time Arrivals (Percent of on time arrivals for scheduled road trains at profiled destination +2 hours)