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Via Electronic Filing

The Honorable Martin Oberman, Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

The Honorable Michelle Schultz, Vice Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

The Honorable Patrick Fuchs
Surface Transportation Board
395 E Street SW
Washington, DC 20423

The Honorable Karen Hedlund
Surface Transportation Board
395 E Street SW
Washington, DC 20423

The Honorable Robert Primus
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: *Urgent Issues in Freight Rail Service – Railroad Reporting*, STB Docket Ex Parte No. 770 (Sub-No. 1)

Dear Chairman Oberman, Vice Chairman Schultz, Members Fuchs, Hedlund, and Primus:

In accordance with the Surface Transportation Board's (the "Board's") May 6, 2022, Decision in the above-referenced docket, Norfolk Southern Railway Company ("Norfolk Southern") today is providing the Board with the first set of performance data figures it has requested on a weekly basis for the next six months.

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Public Record

Included in this submission is the system performance data for the week ending May 13, 2022. Also included is a document describing the methodology by which Norfolk Southern gathered the data and the data selection decisions that it made in an effort to most closely align Norfolk Southern's internal data to the Board's requests. The methodological explanation also identifies areas where Norfolk Southern does not maintain data in the manner requested by the Board. Norfolk Southern notes that many of these metrics are subject to interpretation and may be reported differently by other carriers.

Norfolk Southern will be pleased to answer any questions regarding the methodology used that the Board may have.

Sincerely,

/s/ Hanna M. Chouest

Hanna M. Chouest

Enclosures

**Surface Transportation Board
Docket No. EP 770 (Sub-No.1)
Norfolk Southern Railway Company**

Methodology and Explanation for Performance Data

#1 Weekly Average Terminal Dwell Times for the 11th through 20th Largest Terminals

- Norfolk Southern already reports weekly average terminal dwell times for the top 10 largest terminals as required by EP 724 (Sub-No. 4). Norfolk Southern will report weekly average terminal dwell times for the 11th through 20th largest terminals using the same methodology.
- Norfolk Southern selected these terminals using the same methodology used for reporting pursuant to EP 724 (Sub-No. 4).

#2 Weekly Average Number of Train Starts Per Day, Sorted by Train Type

- Norfolk Southern will provide the weekly average number of road train starts per day.
- Norfolk Southern defines a train start in this context as an origination of a road train excluding through-trains.
- This measure is inclusive of bulk, intermodal, and manifest trains.

#3 Weekly Average of Cars Per Day in Storage, Cars Per Day in Service with Mileage, and Cars Per Day in Storage with No Mileage, Reported Separately by Ownership

- Norfolk Southern will report the weekly average number of cars per day in storage using the relevant AAR definition: a car is in storage after ten (10) or more days without movement.
- Some cars reported as in storage are available for placement to the customer at a local serving yard and may be awaiting customer instruction. Thus, the lack of movement in ten (10) or more days cannot necessarily be attributed to railroad causes.
- Norfolk Southern will report the weekly average number of cars per day in service with no mileage, and the weekly average number of cars per day in service with mileage. For these measures, "in service" means operating inventory that is available for use. Operating inventory is a subset of cars online which are not in a storage pool, on hold, placed behind customer gate not yet released, at a local yard within customer control, or equipment used for maintenance of way or sold for scrap.
- Norfolk Southern will report the aggregate number of car miles per week.
- Norfolk Southern will report the weekly average number of car miles per day. This measure will be calculated by dividing the aggregate number of car miles per week by seven (7).
- Where applicable, Norfolk Southern will use the same methodology used in reporting pursuant to EP 724 (Sub-No. 4).
- Norfolk Southern will separate this reporting by car ownership to the extent that information is available and currently tracked.
- Railroad-owned metrics will reflect Norfolk Southern cars only, excluding foreign.

#4 Weekly Number of Unplanned Recrews Required by Hours of Service and the Recrew Rate Measured as a Percentage of Total Crew Starts

- Norfolk Southern will report the weekly number of unplanned recrews due to compliance with federal hours of service regulations. With some limited exceptions, recrews are almost always necessitated by hours of service regulations. Recrews are inherently unplanned.
- Norfolk Southern will report the recrew rate measured as a percentage of total crew starts.
- Norfolk Southern will report this information for each operating division and for the system.

#5 Percentage of Scheduled Spots and Pulls That Were Fulfilled

- Norfolk Southern currently captures this information in its Local Operating Plan Adherence (“LOPA”) metric, which measures compliance of scheduled placements and pulls at a railcar-level.
- Norfolk Southern uses its LOPA metric to assess its success in delivering cars to a customer’s local facility upon order from the customer.
- Each customer is assigned to a local or yard job to complete the assigned First Mile/Last Mile work. Each customer has a defined service windows by day of week. Each customer’s service window aligns with the time the crew is available to work (12 hours). For each assigned crew, cars are scheduled to be pulled and placed systematically on an Industry Work Order (“IWO”) which is generated at the beginning of the respective crew’s on-duty time.
- An IWO is populated based upon the orders placed by customers for service that date. Planned Placements for open gate customers include the railcars available for placement. Planned Placements for closed gate customers include railcars available for placement and ordered for placement by the customer. The IWO also includes cars scheduled to be pulled from customer facilities—including loads and empties.
- LOPA measures the percentage of time that Norfolk Southern complies with the IWO for a particular location. A planned placement or pull is measured as compliant when the railcar is placed or pulled within 12 hours of the crew’s IWO creation.
- LOPA failures can be both railroad-caused and non-railroad caused. The LOPA figure reported in this weekly performance data will count both railroad-caused and non-railroad-caused missed service as a failure which will count against the LOPA indicator.
- NS will report the LOPA measure for each operating division and the system.

#6 Weekly Average Number of Local Trains Cancelled Per Day

- To report this measure, Norfolk Southern relied upon its data on “annulled” trains.
- For purposes of this metric, Norfolk Southern will report annulled local trains (as further described below) with no mileage.
- A local train on the Norfolk Southern network may do more than simply serve a customer (compare Decision at 6, n. 13, STB Docket No. EP 770 (Sub-No. 1) (served May 6, 2022)). Local assignments may shuttle cars between distinct yards, help build other trains, or perform ad hoc moves. Additionally, trains other than locals may place cars at industry, e.g., road trains and yard jobs.
- In reporting this metric, Norfolk Southern will include all trains internally identified as local. Doing so counts cancellations that may not indicate any adverse impact to a customer. Additionally, not all cancellations are railroad cancellations. Sometimes, a customer will cancel a train due to plant shutdowns or other reasons.
- Norfolk Southern will report the weekly average number of local trains cancelled per day.
- Norfolk Southern does not track the aggregate number of local trains cancelled per week broken down by cause. Therefore, all local trains cancelled per week are included in the “other” category.

#7 On Time Delivery Information

- For scheduled manifest traffic, Norfolk Southern will provide the percentage of cars constructively or actually placed at destination within 24 hours of the Original Estimated Time of Arrival (“Original ETA”). Norfolk Southern generates the Original ETA when a car is either pulled from customer or received at interchange. Norfolk Southern uses the Original ETA to measure whether the car arrives on time or late at its final NS planned movement, generally placed destination or forwarded interchange.
- Norfolk Southern unit trains are not scheduled. Norfolk Southern does not generate an Original ETA for unit trains, and therefore does not track the data that the Board has requested. Norfolk Southern already provides other data related to unit trains pursuant to EP 724 (Sub-No. 4).
- Intermodal trains are measured in a manner similar to manifest trains and Norfolk Southern will include an indicator of the percentage of intermodal trains that reach destination (where the intermodal train terminates) within 24 hours of the Original ETA.