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Dear Chairman Oberstar and all STB Members: Public Record

I submitted comments to docket# EP770 on Tuesday, which I had originally composed and submitted to STB back on February 5, 2020 - before this docket was established. Thank you for allowing my previous comments to be part of the EP770 docket.

After watching most of the testimony on EP770 via YouTube on Tuesday and Wednesday, I do have additional comments I would like the STB to consider. Again, I think it is crystal clear that the supply chain crisis we are experiencing today was years in the making. However, the Precision Scheduled Railroading (PSR) implementation industry-wide was the tipping point that triggered today's meltdown of the national rail network. Consequently, the PSR business model needs to be scrapped and STB must implement appropriate carrier guidelines to ensure no "repackaging" or reiteration of this irresponsible railroad operating model happens in the future. Additionally, STB must come up with a sensible, standardized "data & metrics" system that constantly monitors Class I and Shortline service performance (in real-time to the extent practical).

The comments I listened to by several Class I executives are a prime example of why. The UP-Transportation VP who testified about the mathematical labyrinth they use (Gross Inventory, Active Inventory, Operating Inventory, etc.) indicated... [...things are headed in the right direction]. I'm sorry, but that guy apparently can't see the forest for the trees. Inflation is running rampant and some, if not all, of the cost increases are associated with the inability of rail shippers to get essential products to market. The Class I railroad managers are "behind the curtain" pulling the levers and chasing numbers rather than growing a customer service orientated rail network. As my physics professor at college used to say, "Strive for a thorough understanding of this discipline and then strive to become proficient in its application. Otherwise, you end up being nothing more than a formula fitting fool." Today, all the Class I railroad boardrooms are filled with formula fitting fools whose interests in pleasing Wall Street far outweigh understanding the shippers needs and being proficient at providing rail service to meet those needs (failure of the centralized model vs. the localized model). These "fools" are detrimental to our national security, national economy, shippers, large and small businesses alike, and ultimately to our workers. The Class I PSR business model must be dismantled and scrapped. Anything short of that is not in our nation's best interests.

Second, I also think it is crystal clear that we're not going to get out of this rail network supply chain mess in a week, month, or even a year. Why? Because the two primary factors needed to do that are: 1) Locomotive Power (which is mothballed) and 2) Trained and proficient locomotive engineers and conductors to operate trains. The Class I Human Resource people testified as to how they intend to "pivot" to accomplish this daunting task including using Second Chance, former military, and other hiring programs. Best case scenario, that's six-months to a year *minimum* to get proficient "boots on the ground" who can safely and efficiently move freight and service customers. But what the Class I HR people purposely did *not* tell you is there *does* exist an almost immediately solution that would help alleviate the employee shortage:

Reinstatement of all the railroad workers they have fired (or intend to fire) under their Draconian Availability Policies born out of PSR. The STB should communicate with the National Mediation Board and urge that board to reexamine every single termination case over the past six years. Then, take action to reinstate, with full back pay and benefits, every single railroad worker fired by the Class I carriers during this timeframe. I do not have the exact numbers, but all Class I roads combined, I would imagine that is a fairly large number and a number that would “move the needle” on the qualified employee shortage number and be a start to filling positions that are desperately needed today. Remember, many of these fired employees are trained and experienced workers in their crafts and already “know their jobs and know how to railroad.” These fired employees, if given the opportunity, could return to their jobs and literally make an instant impact on the employee shortage crisis we are now experiencing and do so in a matter of days or weeks - verses the months or years needed for a new hire employee to be trained, proficient, and working on the railroad.

Finally, I want to thank Robert Primus for his “pull no punches” line of questioning of the Class I executives and, particularly, of CSX CEO James Foote. Robert Primus was able to effectively get under Foote’s thin skin, which lead to very revealing comments. One of which was, “Well, if you’d let us run one-man crews, we wouldn’t have a shortage.” This testimony confirms exactly what I wrote STB about earlier this year: **The railroad do not want any train crews at all. Rather, they want either a single-person train crew (for now) or total automation (in the future).** The TYE and other railroad craft shortages the nation is experiencing today is an integral component of the PSR business model, which the Class I’ railroads have executed to supercharge profits. Foote’s testimony is all the proof anyone should need, but a more comprehensive investigation into the entire PSR scheme by the investigative units of the Justice Department and the General Accounting Office would likely shed even more light on, “How America Got Railroaded” and, hopefully, glean enough damning evidence to send these CEOs and executives to prison where they belong. Thank you. Respectfully, Mike Elliott