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The Honorable Cynthia T. Brown
Chief, Section of Administration, Office of Proceedings
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423

**Re: Finance Docket No. 36500 (Sub-No. 6), *Canadian Pacific Ry. – Control –
Kansas City Southern***

Dear Ms. Brown:

I am writing on behalf of Canadian Pacific Kansas City Limited (“CPKC”), on behalf of its U.S. rail carrier subsidiaries, to provide the Board with corrected versions of certain Operational and Customer Data Files previously submitted in this docket.

Updated Operational Files

The accompanying updates to Operational Data Files make two sets of corrections.

First, as explained in CPKC’s May 2024 Data Submission (“CPKC-12,” filed May 15, 2024), CPKC determined in some previous periods it had misidentified the operating railroad associated with freight trains crossing the Neches River Bridge. *See* CPKC-12 at 6. The misallocation affected the Operational Data Files submitted by CPKC at Primary Keys 38-67 (all of which relate to the number of trains operated over the Neches River Bridge by CPKC, BNSF, and UP or statistics relating to those trains).

To correct these misallocations and ensure consistency going forward, CPKC developed a revised methodology for more accurately identifying the operator of freight trains crossing the Neches River Bridge, and it has applied that methodology consistently to the entire period for which data was available. This resulted in changes to all Operational Data Files through the

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Submission for June 2024 (*i.e.*, weeks ending during May 2024).¹ The improved methodology developed to address this issue required small changes to the methodology description provided in our October 2023 Submission related to these metrics. Those changes are set forth in redline in Appendix A hereto.²

Second, CPKC has identified a calculation error affecting CN Twin Cities area train counts (on CPKC's Withrow Subdivision) for the period between December 2023 and May 2024, reported in the Operational Data Files at Primary Key 37. The numbers previously reported for these periods reflected the total number of trains during the week rather than the average number of trains per day as intended. The replacement files being submitted correctly report average numbers of trains per day.

CPKC is submitting replacements for the Operational Data Files previously submitted to the Board as follows:

- “STB_FD_36500_6_OPERATIONAL_2023_10_202408080921.csv” (correcting Primary Keys 38-67 for the period between the first availability of these metrics and September 29, 2023, and Primary Keys 68-77 for the week of August 26 to September 9, 2023);
- “STB_FD_36500_6_OPERATIONAL_2023_11_202408080921.csv” (correcting Primary Keys 38-67 for the period between September 30 and October 27, 2023);
- “STB_FD_36500_6_OPERATIONAL_2023_12_202408080921.csv” (correcting Primary Keys 38-67 for the period between October 28 and November 24, 2023);
- “STB_FD_36500_6_OPERATIONAL_2024_01_202408080921.csv” (correcting Primary Keys 37-67 for the period between November 25 and December 29, 2023);
- “STB_FD_36500_6_OPERATIONAL_2024_02_202408080921.csv” (correcting Primary Keys 37-67 for the period between December 30, 2023 and January 26, 2024);

¹ As reported in our May 2024 Submission, this error had been identified and corrected in the files submitted with that Submission. However, development and implementation of a revised methodology for capturing train identification and other information from available data led to small changes in the 2024_05 and 2024_06 Operational Data Files for these Primary Keys.

² In the course of preparing these corrected files, CPKC also identified and corrected (a) certain instances where local trains that did not cross the Neches River Bridge were misidentified as having done so (which occasioned a shift to using MP 765.9 rather than MP 766.0 as the west end of the Bridge) and (b) one instance where the number of Amtrak trains crossing the Neches River Bridge had been misstated when led by a UP locomotive (affecting Primary Keys 68-77 for the week of August 26 to September 9, 2023).

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- “STB_FD_36500_6_OPERATIONAL_2024_03_202408080921.csv” (correcting Primary Keys 37-67 for the period between January 27 and February 23, 2024);
- “STB_FD_36500_6_OPERATIONAL_2024_04_202408080921.csv” (correcting Primary Keys 37-67 for the period between February 24 and March 29, 2024);
- “STB_FD_36500_6_OPERATIONAL_2024_05_202408080921.csv” (correcting Primary Keys 37-67 For the period between March 30 and April 26, 2024); and
- “STB_FD_36500_6_OPERATIONAL_2024_06_202408080921.csv” (correcting Primary Keys 37-67 for the period between April 27 and May 31, 2023).

Updated Customer Files

The accompanying updates to Customer Data Files are being provided to report revised figures for the KCS Manifest On-Time Performance metric, which CPKC began reporting herein with the Customer Data File for weeks ending in January 2024, filed February 15, 2024. During a routine audit of these figures, CPKC determined that its methodology for reporting KCS manifest on-time performance figures had not captured a small number of relevant movements. Including all relevant movements in the calculation of average manifest OTP resulted in small changes in average manifest OTP. The Customer Data File submitted on July 15 (for weeks ending in June 2024) included correct figures. The accompanying updated Customer files provide revised figures for the period at issue, as follows:

- “STB_FD_36500_6_CUSTOMER_2024_02_202407301600.csv” (correcting Primary Key 334 for the period between December 30, 2023 and January 26, 2024);
- “STB_FD_36500_6_CUSTOMER_2024_03_202407301602.csv” (correcting Primary Key 334 for the period between January 27 and February 23, 2024);
- “STB_FD_36500_6_CUSTOMER_2024_04_202407301608.csv” (correcting Primary Key 334 for the period between February 24 and March 29, 2024);
- “STB_FD_36500_6_CUSTOMER_2024_05_202407301610.csv” (correcting Primary Key 334 for the period between March 30 and April 26, 2024);³ and
- “STB_FD_36500_6_CUSTOMER_2024_06_202407301612.csv” (correcting Primary Key 334 for the period between April 27 and May 31, 2023).⁴

³ This file also corrected an issue with duplicate shipments in the week of April 5-12, 2024, which affected KCS Manifest OTP for that period.

⁴ This file also corrected an issue with duplicate shipments in the week of April 27-May 3, 2024, which affected KCS Manifest OTP for that period.

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CPKC's revisions to the KCS manifest OTP figures affect two other sets of figures previously reported in this docket. First, each of CPKC's Data Submissions has included a table reporting the KCS manifest OTP figure for the relevant Reporting Period, along with the associated four-week rolling average figures calculated to implement CPKC's Service Action Plan commitments. The table set forth in Appendix B hereto reports the revised figures.

Second, CPKC's October 2023 Data Submission reported the Service Action Plan benchmark associated with the KCS manifest OTP metric, based on data from the onset of EP 770 reporting through the end of 2022. The revisions to KCS manifest OTP figures affected this benchmarks modestly, as shown in Table 1 below.

TABLE 1
KCS MANIFEST OTP SERVICE ACTION PLAN BENCHMARK

AS REPORTED IN OCTOBER 2023 DATA SUBMISSION		AS REVISED	
2022 AVERAGE	BENCHMARK (AVERAGE LESS 15%)	2022 AVERAGE	BENCHMARK (AVERAGE LESS 15%)
76.0%	61.0%	76.5%	61.5%

Please contact me with any questions.

Respectfully submitted,



David L. Meyer

*Attorney for Canadian Pacific
Kansas City Limited*

cc: All Parties of Record

APPENDIX A

METHODOLOGY RELATING TO NECHES RIVER BRIDGE METRICS

3. Texas – Neches River Bridge

Number of Trains per Day (CPKC, Other Railroads).

For CPKC trains, CPKC used PTC on-board GPS data to identify the discrete trains that ~~that occupied~~ traversed ~~75 percent of~~ the segment between the west end of the Neches River Bridge (KCSR MP 766.0) and the KCSR-UP connection east of the Bridge (known as UP Junction, KCSR MP 764.8) (the “Bridge Block”), determined by a train passing a milepost between MP 765.9 and MP 764.8. ~~(Note that this list may include some trains that did not cross the Bridge, but merely moved into and out of the block on one side of the Bridge.)~~

For Non-CPKC trains, CPKC used PTC data (from the PTC systems on these trains initialized for movement across KCSR trackage) to identify the discrete trains that ~~occupied 75% of~~ traversed the Bridge Block. CPKC identified the operator of the train as follows: Amtrak trains were identified based on the lead locomotive or the train symbol; non-CPKC freight trains were determined to be UP or BNSF trains based on train-symbol data captured in the ordinary course of PTC operations. Reporting for trains of other railroads is limited by the reliability of the PTC data provided by that railroad to CPKC.

CPKC reported the maximum number of trains in a day during the Reporting Week and the calculated average number of trains per day during that period, separately for CPKC, Amtrak, BNSF, and UP.

The PTC data used to identify trains crossing the Neches River Bridge is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC identified the total number of CPKC trains crossing the Bridge using KCSR Train Event data to identify trains with events at Beaumont or other stations both south/west of the Bridge and Vidor, LA or other stations north/east of the Bridge. CPKC is unable to identify trains of other railroads for the period prior to January 1, 2021 because neither KCSR Train Event nor any other data source available to CPKC covering the period prior to January 2021 provides a feasible and reliable means of doing so.

Train Lengths (CPKC, Other Railroads).

For each train identified as crossing the Neches River Bridge during the Reporting Week, CPKC determined the train length using the figures recorded in PTC data, including PTC data for other railroads whose trains were initialized on CPKC's/KCS's PTC system. CPKC reported the length of the longest train during the Reporting Week, separately for each railroad. CPKC reported the number of trains with a length in excess of 10,000 feet, also separately for each railroad. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train, also separately for each railroad. Reporting for trains of other railroads is limited by the reliability of the PTC data provided by that railroad to CPKC.

The elements of PTC data permitting determination of train lengths are available only for the period since May 2022. For the remainder of the five-year lookback period (April 14, 2018 through May 2022), CPKC determined the length of CPKC trains crossing the Bridge using KCSR Train Event data. CPKC is unable to determine the lengths of non-CPKC trains for the period prior to May 2022.

Occupancy Time (CPKC, Other Railroads)

For each train identified as crossing the Neches River Bridge during the Reporting Week, CPKC calculated Bridge occupancy time using PTC on-board GPS data to measure the time between the train's entry into the Bridge block (*i.e.*, the first time the train occupied the block) and the train's exit from the Bridge block (*i.e.*, the last time the train occupied the block). CPKC reported the total number of occupancy minutes per day and the calculated average occupancy time per train, separately for each railroad. Reporting for trains of other railroads is limited by the reliability of the PTC data provided by that railroad to CPKC.

The elements of PTC data permitting the calculation of occupancy times is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC is unable to calculate comparable occupancy times, since neither KCSR Train Event nor any other data source available to CPKC covering the period prior to January 2021 provides a feasible and reliable means of identifying train entry and exit times at the Neches River Bridge.

Minutes Held Prior to Bridge (CPKC, Other Railroads)

For each train identified as crossing the Neches River Bridge during the Reporting Week, CPKC used PTC on-board GPS data to determine the train's route of movement prior to arrival at the Bridge, and used the same data to measure the amount of time each train dwelled (*i.e.*, was not moving for a period of two minutes or more) between a specific start point and arrival at the Bridge.

Westbound trains using KCSR route from DeQuincy, LA: between Vidor (KCSR Beaumont Subdivision MP 760.4) and Bridge.

Westbound trains using UP/BNSF route: between last siding (Connell) on UP Lafayette Subdivision (UP Lafayette Subdivision MP 272.7) and Bridge.

Eastbound trains from Beaumont and west on UP Beaumont Subdivision: between west end of Amelia Siding (UP Beaumont Subdivision MP 450.7) and Bridge.

Eastbound trains from Beaumont and west on UP Houston Subdivision: between east end of China Siding (UP Houston Subdivision MP 297.6) and Bridge.

Eastbound CPKC trains from Port Arthur: between Port Arthur (KCSR Beaumont Subdivision MP 786.1) and Bridge.

CPKC reported the calculated average number of minutes per train, separately by railroad.

The elements of PTC data permitting calculations of hold times are available only for the period since June-September, 2022 (with the initial period of availability depending on the route being measured). For the remainder of the five-year lookback period (April 14, 2018 through June-September 2022), CPKC is unable to calculate comparable occupancy times, since neither CPKC Train Event nor any other data source available to CPKC covering that period provides a feasible and reliable means of identifying train dwell times on the relevant segments.

Transit Times (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC calculated the transit time using train movement details recorded in PTC data, specifically the time difference between Beaumont (train entry into or departure from UP's Houston or Beaumont Subdivisions) and Rosenberg (train entry into or departure from KCSR track at Rosenberg). CPKC reported the maximum transit time during the week and the calculated average transit time.

The PTC data on which these calculations are based is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC calculated transit times between Beaumont and Rosenberg using the events in KCSR Train Event data most comparable to the measures reflected in PTC data, specifically arrival/departure at Beaumont and departure/arrival at Kendleton (CP 905), the closest point to Rosenberg for which train events are reliably available. The calculated transit time was the difference between the latest time at the beginning of the segment and the earliest time at the end of the segment.

5. Texas – Houston Terminal

Transit Times (CPKC)

Starting with the identification of CPKC through trains operating between Beaumont and Rosenberg (in Item 4 above), CPKC separated the trains by route (*i.e.*, the UP Beaumont Subdivision route and the UP Houston Subdivision route) using PTC on-board GPS data.

APPENDIX B

REVISIONS TO REPORTED KCS MANIFEST ON TIME PERFORMANCE FIGURES

Week Ending	As Previously Reported		Updated Figures		Percentage Point Difference (if any)	
	Manifest OTP (Average for Week)	Manifest OTP (Four-Week Rolling Average)	Manifest OTP (Average for Week)	Manifest OTP (Four-Week Rolling Average)	Manifest OTP (Average for Week)	Manifest OTP (Four-Week Rolling Average)
4/21/23	80.27%	N/A	80.71%	N/A	0.44%	N/A
4/28/23	74.41%	N/A	74.60%	N/A	0.19%	N/A
5/5/23	73.32%	N/A	73.29%	N/A	-0.03%	N/A
5/12/23	69.48%	74.37%	69.89%	74.40%	0.41%	0.03%
5/19/23	71.76%	72.24%	70.94%	72.08%	-0.82%	-0.16%
5/26/23	70.97%	71.38%	70.00%	71.04%	-0.97%	-0.34%
6/2/23	66.11%	69.58%	66.72%	69.40%	0.61%	-0.18%
6/9/23	65.86%	68.68%	66.10%	68.42%	0.24%	-0.26%
6/16/23	59.47%	65.60%	63.62%	66.62%	4.15%	1.02%
6/23/23	60.48%	62.98%	62.51%	64.78%	2.03%	1.80%
6/30/23	57.45%	60.82%	58.37%	62.61%	0.92%	1.79%
7/7/23	63.98%	60.35%	64.55%	62.19%	0.57%	1.84%
7/14/23	69.01%	62.73%	70.68%	63.90%	1.67%	1.17%
7/21/23	70.60%	65.26%	72.39%	66.32%	1.79%	1.06%
7/28/23	70.43%	68.51%	71.83%	69.80%	1.40%	1.29%
8/4/23	69.31%	69.84%	71.53%	71.61%	2.22%	1.77%
8/11/23	58.64%	67.25%	64.33%	70.05%	5.69%	2.80%
8/18/23	64.79%	65.79%	69.20%	69.25%	4.41%	3.46%
8/25/23	60.50%	63.31%	64.95%	67.55%	4.45%	4.24%

Week Ending	As Previously Reported		Updated Figures		Percentage Point Difference (if any)	
	Manifest OTP (Average for Week)	Manifest OTP (Four-Week Rolling Average)	Manifest OTP (Average for Week)	Manifest OTP (Four-Week Rolling Average)	Manifest OTP (Average for Week)	Manifest OTP (Four-Week Rolling Average)
9/1/23	66.12%	62.51%	69.23%	66.99%	3.11%	4.48%
9/8/23	64.71%	64.03%	67.51%	67.73%	2.80%	3.70%
9/15/23	68.03%	64.84%	70.88%	68.19%	2.85%	3.35%
9/22/23	69.60%	67.12%	72.08%	69.96%	2.48%	2.84%
9/29/23	69.90%	68.06%	72.56%	70.77%	2.66%	2.71%
10/6/23	72.99%	71.45%	74.88%	72.56%	1.89%	1.11%
10/13/23	71.48%	71.85%	74.61%	73.53%	3.13%	1.68%
10/20/23	75.80%	72.95%	77.28%	74.83%	1.48%	1.88%
10/27/23	76.09%	74.17%	77.48%	76.06%	1.39%	1.89%
11/3/23	78.87%	76.67%	79.66%	77.21%	0.79%	0.54%
11/10/23	74.99%	77.08%	76.30%	77.67%	1.31%	0.59%
11/17/23	77.63%	77.29%	78.63%	77.99%	1.00%	0.70%
11/24/23	81.62%	78.34%	83.40%	79.45%	1.78%	1.11%
12/1/23	80.54%	78.59%	82.27%	80.12%	1.73%	1.53%
12/8/23	81.29%	80.22%	82.91%	81.85%	1.62%	1.63%
12/15/23	85.16%	83.04%	85.80%	83.61%	0.64%	0.57%
12/22/23	86.99%	84.00%	87.40%	84.53%	0.41%	0.53%
12/29/23	70.90%	81.67%	74.16%	83.06%	3.26%	1.39%
1/5/24	80.58%	81.26%	81.89%	82.78%	1.31%	1.52%
1/12/24	83.37%	80.76%	84.05%	82.25%	0.68%	1.49%
1/19/24	76.55%	78.02%	79.04%	80.15%	2.49%	2.13%
1/26/24	79.21%	80.00%	80.91%	81.48%	1.70%	1.48%
2/2/24	83.47%	80.81%	84.38%	82.08%	0.91%	1.27%
2/9/24	80.88%	80.13%	83.01%	81.85%	2.13%	1.72%
2/16/24	82.39%	81.61%	83.07%	82.80%	0.68%	1.19%

Week Ending	As Previously Reported		Updated Figures		Percentage Point Difference (if any)	
	Manifest OTP (Average for Week)	Manifest OTP (Four-Week Rolling Average)	Manifest OTP (Average for Week)	Manifest OTP (Four-Week Rolling Average)	Manifest OTP (Average for Week)	Manifest OTP (Four-Week Rolling Average)
2/23/24	81.85%	82.25%	84.02%	83.61%	2.17%	1.36%
3/1/24	84.53%	82.53%	85.04%	83.79%	0.51%	1.26%
3/8/24	80.73%	82.38%	82.25%	83.59%	1.52%	1.21%
3/15/24	81.34%	82.12%	84.00%	83.82%	2.66%	1.70%
3/22/24	80.88%	81.91%	82.52%	83.44%	1.64%	1.53%
3/29/24	80.56%	81.84%	81.82%	82.64%	1.26%	0.80%
4/5/24	78.95%	81.18%	80.56%	82.23%	1.61%	1.05%
4/12/24	84.31%	81.34%	85.43%	82.61%	1.12%	1.27%
4/19/24	86.37%	82.60%	86.03%	83.50%	-0.34%	0.90%
4/26/24	83.92%	83.50%	84.79%	84.23%	0.87%	0.73%
5/3/24	84.72%	84.72%	85.25%	85.38%	0.53%	0.66%
5/10/24	75.44%	82.75%	78.64%	83.52%	3.20%	0.77%
5/17/24	73.49%	79.20%	74.77%	80.67%	1.28%	1.47%
5/24/24	70.47%	75.77%	73.73%	77.85%	3.26%	2.08%
5/31/24	69.68%	72.16%	72.51%	74.97%	2.83%	2.81%
6/7/24	78.84%	74.94%	78.84%	74.99%	0.00%	0.05%
6/14/24	80.20%	76.33%	80.20%	76.31%	0.00%	-0.02%
6/21/24	81.03%	78.11%	81.03%	78.10%	0.00%	-0.01%
6/28/24	76.56%	79.19%	76.56%	79.23%	0.00%	0.04%