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Jessica Ring Amunson
Tel +1 202 639 6023
JAmunson@jenner.com

VIA ELECTRONIC FILING

Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: *Complaint and Petition of the National Railroad Passenger Corp. Under 49 U.S.C. § 24308(f) for Substandard Performance of Amtrak's Sunset Limited Trains 1 and 2*, STB Docket No. NOR 42175

Dear Ms. Brown:

Amtrak respectfully provides this limited response to Union Pacific Railroad Company ("UP")'s Request for Extension of Time (filed March 26, 2024). The Board's February 13, 2024 Order required the parties to respond to the Board's requests by April 15, 2024. UP seeks 90 additional days, extending its deadline to July 15, 2024, to provide narrative explanations of the root causes of the "Host-Responsible Delays on a Run-by-Run Basis" listed in Part I of the Order's Appendix. See UP Request at 2. Amtrak takes no position on UP's request for an extension with respect to this part of the Order. It is Amtrak's understanding that UP's extension request applies only to UP's response to Part I of the Order's Appendix and that UP will provide responses to all other parts of the Order (including "Select Host-Responsible Delays of 90 Minutes or More" listed in Part II of the Order's Appendix, "II. Host-Responsible Delays—Focused Questions: Slow Orders by Subdivision," and "IV. Site- and Party-Specific Questions") by April 15, 2024.¹

Amtrak anticipates that all parties will provide the Board with all materials necessary to evaluate their root cause analysis, to the extent those materials were not previously produced to the Board. For example, UP states that it will "mine an extraordinarily large amount of data" to analyze the root causes of the delays identified by the Board, including "data granular enough to identify requests to line signals, how signals were lined, and when trains passed control points," "information regarding incidents that impacted locomotives, rail cars, tracks, sidings, signals, and

¹ Amtrak likewise interprets BNSF Railway Company's request that any deadline set by the Board in response to UP's Request apply equally to all parties as implicating only the response to Part I of the Order's Appendix. See BNSF's Response (filed March 26, 2024).

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crew hours of service,” “records of mechanical incidents or other incidents,” and “raw data from its dispatching records.”² UP Request at 3-4. To ensure the Board and all parties can evaluate and test the root cause analysis submitted by each party, and facilitate the expeditious conduct of this proceeding, Amtrak respectfully proposes that the Board order all parties to submit the data, documents, and other materials relied upon to prepare root cause analyses, within two weeks of their submissions.

Sincerely,

/s/ Jessica Ring Amunson
Jessica Ring Amunson

*Counsel for the National Passenger Railroad
Corp. (“Amtrak”)*

cc: All parties of record (via email)

² UP also states that it will consult with dispatching personnel.

CERTIFICATE OF SERVICE

I, Jessica Ring Amunson, certify that copies of this document are simultaneously being provided by email to all parties identified on the service list for this proceeding, Docket Number NOR 42175.

March 29, 2024

/s/ Jessica Ring Amunson
Jessica Ring Amunson