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May 25, 2022

Via E-Filing

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

Re: Docket No. EP 770 (Sub-No. 1), *Urgent Issues in Freight Rail Service—
Railroad Reporting*

Dear Ms. Brown:

The U.S. rail operating subsidiaries of Canadian National Railway Company (collectively, “CN”) respectfully submit this letter in response to the Board’s order served on May 6, 2022, in the above-captioned docket.

CN is submitting the monthly employment data for new metric 8 for April 2022, as well as a description of CN’s reporting methodology for that metric. There are several instances where the specific data requests within metric 8 did not provide explicit instructions or definitions. CN describes in the attached methodology document any assumptions, exclusions, or modifications in its data used to respond to the request. If CN revises its methodology, CN will file an updated methodology document in this docket.

The STB provided templates and a technical information document to CN on May 13, 2022. CN is providing its employment data based on the template provided, in both XLS and CSV format. In the event of any conflict between the technical information document and the template, CN will follow the template.¹

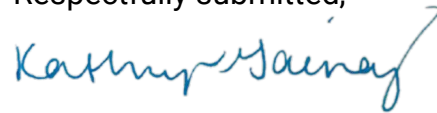
¹ CN has used Grand Trunk Corporation (“GTC”) as the railroad identifier in the template, as CN’s U.S. rail operating subsidiaries are reported to the Board on a consolidated

In the course of preparing the monthly employment data for April 2022 for new metric 8, CN determined to change its methodology for reporting information on Form C going forward. The carriers identified in Form C do not include all of CN's U.S. rail carrier subsidiaries listed in Schedule 250 to GTC's Annual Report R-1. Waterloo Railway Company and Wisconsin Chicago Link Ltd., non-operating rail carrier entities which do not have any employees, have not been identified in Form C. Form C also has not included The Pittsburgh & Conneaut Dock Company ("P&C Dock"), which does not own or operate any main lines of railroad and is listed in Schedule 250 as a "Rail-related" affiliate. P&C Dock has, however, previously been determined to be a rail carrier by the Interstate Commerce Commission,² and has a small number of employees (less than 25).

Going forward, CN will include these three U.S. railroad subsidiaries for its reporting in Form C and metric 8. CN is currently verifying information related to the employees of P&C Dock, and will file an updated report for metric 8 for April 2022 in this docket.

Concurrent with this submission, CN is also submitting Week 20 of the service performance data in XLS and CSV format.

Respectfully submitted,



Kathryn J. Gainey

Attachment

Class I basis under the name GTC. See *Consol. Reporting By Commonly Controlled R.Rs.*, 5 S.T.B. 1050 (2001), codified at 49 C.F.R. § 1201(1-1)(b)(1).

² See *Assoc. of P&C Dock Longshoremen v. Pitts. & Conneaut Dock Co.*, 8 I.C.C.2d 280 (1992).

**GTC's STB EP 770 (SUB-NO. 1) EMPLOYMENT METRICS
AND ASSOCIATED METHODOLOGY**

May 25, 2022

- 1. For each category of employees covered in the Monthly Report of Number of Railroad Employees (Form C) submitted to the Board's Office of Economics under 49 C.F.R. § 1246.1: (i) total employee count; (ii) how many employees were added; (iii) how many employees were separated (with a breakout of those employees who separated by voluntary resignation); (iv) how many employees have been furloughed but are potentially available for recall; (v) the number of "extra-board employees"; and (vi) for categories 300, 400, 500, and 600, how many employees are working in active service (as opposed to completing training courses). Carriers should report these data for each railroad operating division to the maximum extent practicable, and should also report these data on a system-wide basis**
 - CN has three divisions in the United States: Central, Gulf, and Midwest. CN will report data for these divisions for category 600 (train and engine).
 - Metric 8(i), total employee count
 - CN will report U.S. system numbers for categories 100-500 in the template at the Division 01 subvariable field.
 - CN will use the same reporting methodology that it applies to report total active employee counts in Form C. Active employees do not include employees on furlough or leave of absence. Active employees include trainees.
 - Metric 8(ii), how many employees were added
 - CN will calculate how many active employees were added for the prior month.
 - Added active employees will include new hires, as well as employees who have returned from furlough or leave status.
 - For category 600, employees added in a division could include any employees who moved from one division to another.
 - Metric 8(iii), how many employees were separated (with a breakout of those employees who separated by voluntary resignation)
 - CN will calculate how many employees were separated for the prior month.
 - Separations include retirements, resignations, and terminations, as well as employees placed on furlough or leave status.
 - For category 600, employees subtracted in a division could include any employees who moved from one division to another.
 - Metric 8(iv), how many employees have been furloughed but are potentially available for recall
 - CN will provide the total number of employees on furlough as of mid-month.

- Metric 8(v), the number of “extra-board employees”
 - CN will provide data only for category 600 (train and engine), as it does not have extra-board employees for other categories of employees.
 - Extra-board is an assignment and not an employee/payroll status.
 - CN will provide the number of extra-board assignments as of mid-month.
- Metric 8(vi) for categories 300, 400, 500, and 600, how many employees are working in active service (as opposed to completing training courses)
 - CN will determine the number of employees in these categories completing training courses as new hires (excluding training for recertifications) as of mid-month, and will subtract this number from the number of active employees in the above categories.