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Director, Office of Economics
Surface Transportation Board
Washington, DC

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Office of Chief Counsel
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Public Record

Subject: Access to the Confidential Carload Waybill Sample (CCWS) for Academic Research

Dear Director,

We respectfully write, as “Other Users” pursuant to 49 C.F.R. § 1244.9(c), to request access to the Confidential Carload Waybill Sample (CCWS) for academic research purposes. In collaboration with Emma Du Puy (Sciences Po) and Roberto Zuniga (Pontifical Catholic University of Chile), we are conducting research on how buyer competition and transportation costs shape spatial differences in local grain prices and farm profits across the United States. We are also interested in how buyer competition and transportation costs affect the incidence of agricultural subsidies and the ability of U.S. agriculture to respond to changes in global demand and local productivity.

Access to the CCWS would be central to this work because it would allow us to measure freight flows and transportation costs at a sufficiently detailed geographic level, while accounting for congestion and other disruptions to the rail network. Combined with detailed data on grain prices and production, these measures would allow us to estimate how transportation costs, production decisions, and the structure of buyer competition jointly determine local grain prices.

This project forms part of our broader research agenda on U.S. agriculture, and our team has extensive experience working with large administrative, proprietary, and restricted datasets in the United States.

Research Objectives

We will first construct a spatial panel linking local elevator bids for corn, soybeans, and wheat to agricultural production and rail shipment flows. We will use these data to document how farm-gate prices, shipment patterns, and freight costs vary across locations and over time with the structure of the transportation network, the location of grain buyers, and congestion on the rail network.

We will then develop and estimate an empirical model of grain procurement and transportation. Shipment flows, freight revenues, distances, and other shipment characteristics from the CCWS will discipline transportation costs, while local price and production data will allow us to estimate grain supply responses and the degree of competition among buyers. The estimated model will allow us to quantify how transportation costs and buyer market power contribute to geographic differences in farm-gate prices and farm profits.

Finally, we will use the estimated framework to study several policy questions. We will examine the incidence of U.S. Farm Bill subsidies and the extent to which their benefits are passed through to farmers versus captured by buyers; study how buyer competition affects crop switching, land use, and production responses to changes in global demand and local productivity; and evaluate the value of alternative investments in transportation infrastructure.

Data Requested

We request access to the Confidential Carload Waybill Sample for the years 2000 to 2025. The fields requested differ between shipments of corn, soybeans, and wheat, which are the primary commodities studied in our analysis, and shipments of other commodities, which are needed to measure congestion and overall demand for rail capacity.

For shipments of corn, soybeans, and wheat, we request:

- Full 7-digit STCC commodity codes;
- Origin and termination FSACs, associated railroad identifiers, and interchange or junction points needed to characterize the route of each shipment, as well as the type of move (e.g., import, export, or neither);
- Unmasked line-haul freight revenue, transit charges, miscellaneous charges, and fuel surcharges where available;
- Number of carloads, billed weight, actual weight, and distance traveled; and
- Waybill date and accounting period, including month and year.

For shipments of all other commodities, we request only the information needed to construct measures of rail-network utilization and congestion:

- Commodity classification;
- Origin and termination FSACs, associated railroad identifiers, and interchange or junction points needed to characterize the route of each shipment;
- Number of carloads, billed weight, actual weight, and distance traveled; and
- Waybill date and accounting period, including month and year.

We do not request freight revenues, transit charges, miscellaneous charges, or fuel surcharges for non-grain shipments.

Table 1 lists additional fields that we do not anticipate using in our analysis. We provide this list to clarify the scope of our request. If excluding these fields from the extract would be administratively burdensome, we would be happy to receive them as part of the dataset. This does not alter our request above that freight revenue and associated charge information are needed only for shipments of corn, soybeans, and wheat.

Justification for Confidential Data

The CCWS is essential to our research because of its spatial resolution and scope. We already have access to highly detailed elevator-bid data for corn, soybeans, and wheat provided by DTN, which reveal substantial spatial variation in local grain prices. To explain these patterns, we need to match prices with transportation costs and shipment flows at a comparable level of geographic granularity. We have examined the Public Use Waybill File, but its aggregation to the BEA level does not provide sufficient spatial resolution for this purpose.

For shipments of corn, soybeans, and wheat, our analysis requires detailed information on origins, terminations, routes, shipment characteristics, and freight rates. The geographic aggregation in the Public Use Waybill File prevents us from associating freight revenues and shipment characteristics with specific origin and termination stations and detailed routes. Access to the confidential geographic and routing information would allow us to combine shipment revenues and associated charges with volumes, weights, distances, origins, terminations, and interchange points to characterize variation in

the cost of rail transportation across routes and over time. This variation is central to distinguishing differences in local grain prices associated with transportation conditions from those associated with the structure of buyer competition.

Access to unmasked freight revenue for shipments of corn, soybeans, and wheat is particularly important for this analysis. We will use shipment-level revenue, together with shipment weight and distance, to measure variation in the price of rail transportation across routes and over time. Masked contract revenues would introduce measurement error into these measures, limiting our ability to compare freight rates across locations and periods and to distinguish transportation costs from buyer market power. We are not aware of another data source that provides actual shipment-level rail revenues together with the corresponding detailed origins, terminations, routes, weights, and distances.

For commodities other than corn, soybeans, and wheat, we do not require freight revenue or associated charge information. These shipments are needed only to construct measures of rail-network utilization and congestion. Agricultural shipments share rail infrastructure with freight carrying other commodities, so congestion faced by grain shipments depends on total demand for rail capacity rather than agricultural traffic alone. We therefore require information on the timing, routing, volume, and weight of non-grain shipments, but not their freight revenues or associated charges.

Confidentiality

We recognize that the CCWS contains highly confidential proprietary information and agree to comply fully with the requirements of 49 CFR 1244.9 and with all terms of the confidentiality agreement required by the STB. Members of our research team have extensive experience working under data-use agreements and secure-data protocols and complying with restrictions governing the access, storage, disclosure, and publication of confidential data. Access to the CCWS would be limited to academic research purposes and to the following three researchers:

1. Emma Du Puy, Assistant Professor of Economics, Sciences Po
2. Marguerite Obolensky, Lecturer in Economics, University College London
3. Roberto Zuniga, Assistant Professor of Industrial and Systems Engineering, Pontifical Catholic University of Chile

Any public release of results derived from the CCWS will comply with the aggregation and disclosure requirements set forth in 49 CFR 1244.9(f) and with the terms of the applicable STB confidentiality agreement. We will not publicly disclose information that could identify individual shippers or railroads.

We appreciate your consideration of this request and are fully committed to complying with all confidentiality requirements and data-handling protocols set forth by the STB. We believe that access to the CCWS will substantially advance our understanding of how transportation infrastructure and buyer competition shape U.S. agricultural markets. Please do not hesitate to contact us if further information or documentation is required in support of this request.

Yours sincerely,

Marguerite Obolensky
On behalf of the research team

Table 1: Additional Carload Waybill Sample fields not required for our analysis. Field numbers follow Table 4-1 of the 2019 STB Waybill Reference Guide.

Field	Data element	Reason not required
A. Physical equipment characteristics		
8	Intermodal TOFC/COFC Service Code	Intermodal service-plan detail; we require only the all-rail/intermodal distinction (field 20).
59	Nominal Car Capacity (expired)	Discontinued field.
61	Outside Length	Car dimensions play no role in freight-rate, routing, or capacity measures; equipment class is captured by fields 70 and 90.
62	Outside Width	As above.
63	Outside Height	As above.
64	Extreme Outside Height	As above.
65	Type of Wheel Bearings and Brakes	Mechanical detail with no bearing on rates or flows.
66	Number of Axles	As above.
67	Draft Gear	As above.
68	Number of Articulated Units	Relevant only to intermodal equipment configuration.
71	Mechanical Designation Code	Redundant with AAR Equipment Type Code (field 70).
72	Licensing State (TOFC)	Highway licensing detail for trailers.
73	Maximum Weight on Rail	Engineering limit; billed and actual weights (fields 13–14) are sufficient.
94	AAR Trailer/Container Equipment Type Code	Intermodal equipment detail; not used.
B. Facility attributes unrelated to grain handling or rail capacity		
174	Origin Automobile Ramp Facility Code	Automobile-ramp facilities are irrelevant to grain origination and to our congestion measures.
175	Destination Automobile Ramp Facility Code	As above.
176	Origin Intermodal Flag	Station-level intermodal facility indicator; intermodal traffic enters our congestion measures through shipment volumes, not station attributes.
177	Destination Intermodal Flag	As above.