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**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Ex Parte No. 767

FIRST-MILE / LAST-MILE SERVICE

OPENING COMMENTS ON BEHALF OF CN

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Dated: December 17, 2021

The U.S. rail operating subsidiaries of Canadian National Railway Company (hereafter “CN”)¹ respectfully submit these comments in response to the Board’s decision requesting comment about first mile/last mile service and metrics served on September 2, 2021, in the above-captioned proceeding. The decision specifically seeks comment from Class I carriers regarding data relevant to first mile/last mile service that is tracked and made available to customers.

As part of CN’s commitment to customer-centric railroading, CN surveys its customers to solicit feedback. According to CN’s customers, consistent and transparent information about their shipments is one of the most important aspects of first mile/last mile service. Our customers want to know the anticipated plan for their shipments, be able to track those shipments, and be notified of updates. CN’s eBusiness tools, described below, give carload customers the ability to monitor their first mile/last mile service for their facilities served by CN.² These tools, which provide our customers with real-time data about their service, are more useful and valuable than any form of aggregated reporting metric.

¹ These subsidiaries report to the Board on a consolidated Class I basis under the name of Grand Trunk Corporation. *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). They include Illinois Central Railroad Company, Wisconsin Central Ltd., Grand Trunk Western Railroad Company, Bessemer and Lake Erie Railroad Company, and Chicago, Central & Pacific Railroad Company.

² The factual information contained herein is verified in the attached verification by Jason Hilmanowski.

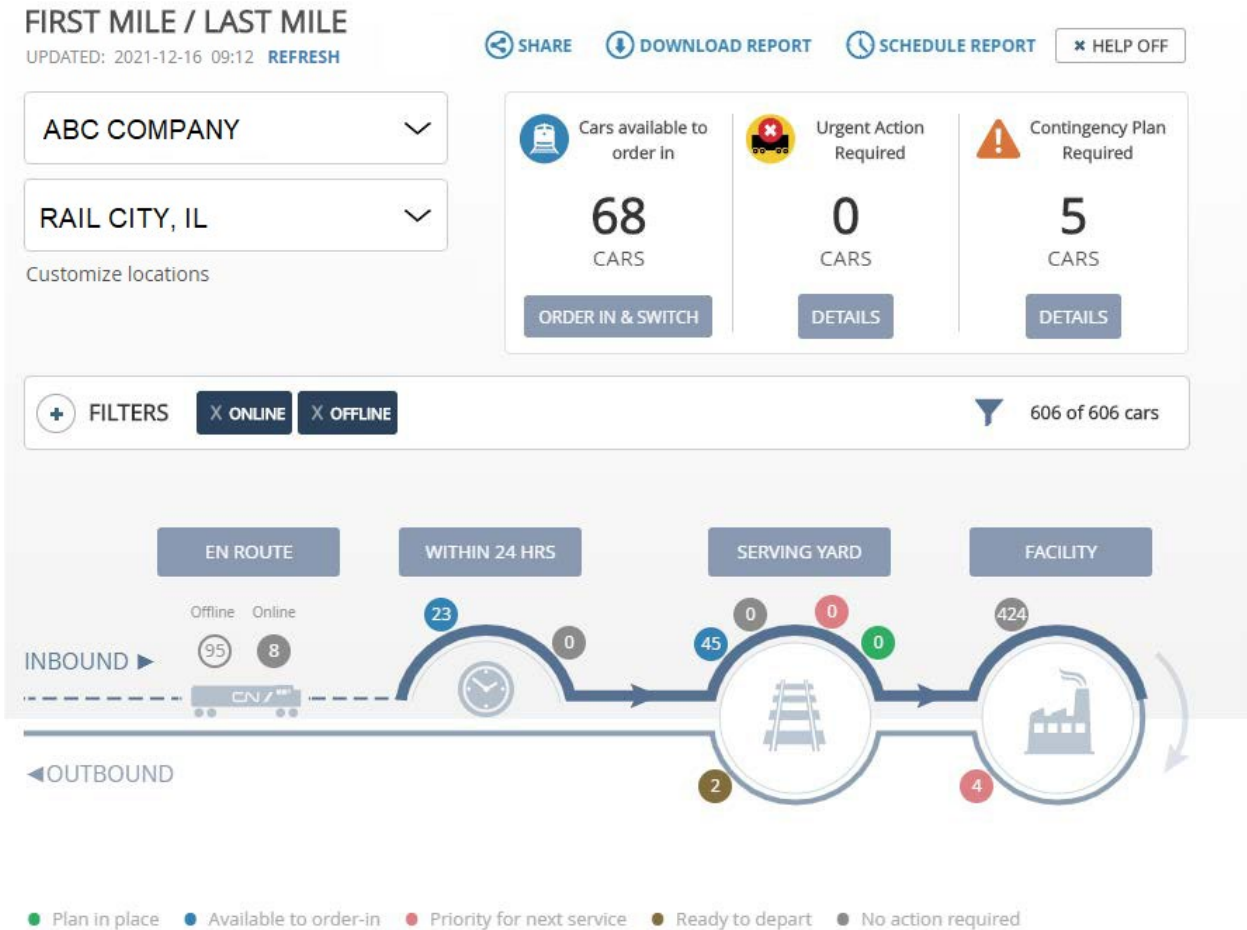
I. CN provides customers with effective real-time tools to monitor their shipments through CN's sophisticated eBusiness platform

Visibility into car movements during the first and last mile is important to our customers. For this reason, CN has developed numerous tools to provide that visibility within “CN One”—a suite of eBusiness tools that provides detailed information, notifications, and alerts.

CN One provides information related to a customer's first mile/last mile service through a number of tools. CN's First Mile/Last Mile tool was first launched in 2014, with new features and improvements being added over the years. It provides our carload customers with visibility, on an individual facility basis, into the pipeline of railcars inbound to their facility, cars currently at their facility, and cars that are outbound. This allows customers to plan in advance for rail service at their facility served by CN. The tool is interactive and allows customers to view information at the car-level for their shipment, including commodity type and shipment origin. The tool also allows customers to view select cars from their total pipeline by filtering for empty and loaded cars, for cars on and off CN's network, for commodity, and for equipment type. Figure 1 provides a screen shot of this tool.³

³ The screenshots provided in Figures 1-7 have been redacted to remove any identifying customer information.

Figure 1: First Mile/Last Mile tool



In Figure 1, the customer has 68 cars available to order in, 45 of which are in the local CN serving yard and 23 of which are slated to arrive in the serving yard within 24 hours. The customer has an additional 103 inbound cars en route to the serving yard, 8 of which are on CN's system and 95 of which are on another railroad. For outbound service, the customer has 4 cars slated to be pulled from the customer facility and 2 cars ready to depart the CN serving yard. The customer has 424 cars spotted at its facility in the process of loading or unloading. The alerts

dashboard also provides information about cars for which a contingency plan or urgent action is required.⁴

CN's My Shipments and Quick Trace tools provide additional visibility into first mile/last mile service. The My Shipments tool provides customers with customized reports that can monitor shipments in their first mile and last mile, for all of the customer's traffic, or for specific traffic (*e.g.*, for a specific origin to destination or for a specific commodity). The tool also allows our customers to monitor specific shipment statuses, such as delayed for repair, holds, and shipments not moved in a certain number of hours. Flexible field display options allow customers to include key pieces of information that are relevant to them in these reports. Our customers can schedule to have their My Shipments report automatically emailed, at desired times of the day, in a variety of output formats up to 30 times per week per report. The Quick Trace tool provides similar information to My Shipments, but on an ad-hoc basis (rather than regular reports). Using Quick Trace, the customer can trace up to 300 shipments. Figure 2 is an example of a report generated through My Shipments.

⁴ The contingency plan category identifies cars impacted by a temporary outage/disruption. The urgent action category identifies cars that require customer action—for example, if there is a customs hold or if a car is improperly loaded.

Figure 2: My Shipments tool

My Shipments - ABC Company for Shipments Destined to Rail City, IL

Sort by: Then by: ☒ No Totals
☐ With Totals
Order: ☐ A-Z ☒ Z-A Order: ☐ A-Z ☒ Z-A ☐ Totals Only

All Shipments, Both Loads and Empties, Delivery Date View

Equipment	Status	Location	Destination	ETA	Delivery Date	Delivery Difference	Carrier	Links
1948	Empty Departed Aldershot, ON 13 Sep 14:35 ET	M39731 13	Rail City, IL	At Receiver Rail City, IL on 17 Sep 18:00	At Receiver Rail City, IL on Sep 21 06:00	 84:00 hrs Earlier i	CN	   
6128	Empty Departed Aldershot, ON 13 Sep 14:35 ET	M39731 13	Rail City, IL	At Receiver Rail City, IL on 17 Sep 18:00	At Receiver Rail City, IL on Sep 21 06:00	 84:00 hrs Earlier i	CN	   
31301	Empty Departed Aldershot, ON 13 Sep 14:35 ET	M39731 13	Rail City, IL	At Receiver Rail City, IL on 17 Sep 18:00	At Receiver Rail City, IL on Sep 21 06:00	 84:00 hrs Earlier i	CN	   
02543	Empty Departed Aldershot, ON 13 Sep 14:35 ET	M39731 13	Rail City, IL	At Receiver Rail City, IL on 17 Sep 18:00	At Receiver Rail City, IL on Sep 21 06:00	 84:00 hrs Earlier i	CN	   
23536	Empty Arrived Toronto Macmill Yard, ON 13 Sep 02:29 ET	M39491 12	Rail City, IL	At Receiver Rail City, IL on 17 Sep 18:00	At Receiver Rail City, IL on Sep 21 06:00	 84:00 hrs Earlier i	CN	   
95186	Empty Departed Aldershot, ON 13 Sep 14:35 ET		Rail City, IL	At Receiver Rail City, IL on 17 Sep 18:00	At Receiver Rail City, IL on Sep 21 06:00	 84:00 hrs Earlier i	CN	   

In this particular example, the customer can view the current ETA of each shipment, the original planned Delivery Date, and the difference between the two (with color-coded flags highlighting whether the shipment is early or late).

CN also provides tools allowing our customers to view rail cars in the first and last mile and order in or release rail cars. The “Order In Railcars” tool shows railcars that are at CN’s destination yard, within 48 hours of a customer, or held in storage at the customer’s request. Our customers can choose the desired switch window and the specific railcars they want delivered and provide special instructions for CN’s crew. The “Release Railcars” tool shows railcars currently on-site at a customer’s facility. Using this tool, our customers can release the cars back to CN following loading or unloading. Similar to the Order In Railcars tool, customers can choose the desired service window and the specific railcars to be released and can provide special instructions for CN’s crew.

Figure 3: Order In Railcars tool

Order In Railcars

Company* ABC Company **Location*** Rail City, IL [Update your personal location list](#)

Destination Track(s)* AA12-AA18

Equipment Consigned to ABC Company, Rail City, IL Search Car: ?

Current Location: Rail Yard A, IL [Next Available Service](#)

CN TRACK - KC14

Seq	Car	L/E	Select	? Unloading/loading location Request Change	? Special Instructions
19	95104	L	☒	AA1401 Company ABC (3 cars)	

Current Location: Rail Yard B, IL Your next planned service date/time: 17 Dec 20:00-10:00 PT, Cutoff 17 Dec 18:00

Special instructions for switch crew:

CN TRACK - OC75

Seq	Car	L/E	Select	? Unloading/loading location Request Change	? Special Instructions
1	638915	L	☐	Select location	
2	876497	L	☐	Same as above	
3	638244	L	☒	AA1801 Company ABC (2 cars)	Spot at door 2

Equipment En Route to ABC Company, Rail City, IL

Current location: En route To be delivered as early as possible following arrival at your CN serving station

K 58252 15 arrived Rail Town, IL

Seq	Car	L/E	ETA	Select	? Unloading/loading location Request Change	? Special Instructions
47	247	E	2021-12-18 05:40	☐	Select location	

2 cars selected

Figure 4: Release Railcars tool

Release Railcars

Company * ABC Company ▼

Location * Rail City, IL ▼ Go [Update your personal location list](#)

[Help](#) Demo

ABC Company, Rail City, IL [TR01](#)

[View equipment already released](#)

Search Car: Search

Track TR01

Seq ▲	Car ▲	Load / Empty ▲	Empty ?	Load ?	Special Release ?	Links
			All	All		

Switch date/time: 14 Sep 20:00-06:00 MT, Cutoff 19:00 ▼

Cars consigned to your facility located in a CN serving yard.

730480	Empty	☐	☐	Select Special Release Type ▼	
730497	Empty	☐	☐	Select Special Release Type ▼	
2137	Empty	☐	☐	Select Special Release Type ▼	

Equipment already released for ABC Company, Rail City, IL [TR01](#)

[View Equipment available for release](#)

Search Car: Search

Track TR01

Seq ▲	Car ▲	Load / Empty ▲	Release Status ▲	Release Date ?	Service Window ?	Cancel ?	Links
001	627193	Load	Released	13 Sep 12:42 MT	14 Sep 20:00-06:00 MT, Cutoff 19:00	☐	
002	127269	Load	Released	13 Sep 12:42 MT	14 Sep 20:00-06:00 MT, Cutoff 19:00	☐	

14 Sep 20:00-06:00 MT, Cutoff 19:00

☒ E-mail a copy of this request to ismith@domain.com
[Update Recipients](#)

Note: Cancelling a release will void any activated Shipping Instructions that have been received for the railcar.

Cancel
Submit

The Car Order tool allows customers to generate two types of reports: one to track equipment by the customer's order date/time (Car Order Report shown in Figure 5) and the other to track equipment by the local service window (Delivery Plan Report shown in Figure 6). These reports provide information on the number of cars to be supplied, equipment IDs, the type of equipment, ETAs, and status, among other information.

Figure 5: Car Order tool (Car Order Report)

Car Order Report

Report Criteria: ABC Company, Rail City, IL, 011111, TR01, FLAT BULKHEAD CENTERBEAM

Report Date Range: 2021-09-04 to 2021-09-24

ABC Company

Rail City, IL

Pattern 011111, TR01, FLAT BULKHEAD CENTERBEAM

CCO# 011111

Track TR01

Car Type Flat Bulkhead Centerbeam

Lead Time 24 hrs

Order Cutoff Wed 14:00 ET

Status		At receiver (start of week)		Total Ordered		Total Confirmed		Placed/CP Empty			Released	
Sep 5-Sep 11		8		40		40		30			38	
Loading Date/Time		Switch Date/Time		Ordered	Confirmed	Constructively Placed	Placed (Actual or Planned)			Released	Rejected	Shortage / Surplus
							Empty	Reload	Total			
Sun	05 Sep			0	0	0	5	0	5	0	0	+8
Mon	06 Sep			0	0	0	0	0	0	0	0	+13
Tue	07 Sep	N/A	Tue 07 Sep 19:00 - 03:00	10	10	0	0	0	0	13	0	+13
Wed	08 Sep	N/A	Wed 08 Sep 19:00 - 03:00	10	10	0	16	0	16	9	0	+3
Thu	09 Sep	N/A	Thu 09 Sep 19:00 - 03:00	10	10	0	9	0	9	12	0	+9
Fri	10 Sep	N/A	Fri 10 Sep 19:00 - 03:00	10	10	0	0	0	0	4	0	+8
Sat	11 Sep			0	0	0	0	0	0	0	0	-2
Totals for Sep 5 - Sep 11				40	40	0	30	0	30	38	0	

Shortage of 2 cars from last week was reset to 0 on Sunday. If you still require these cars, please update your orders accordingly.

Status		At receiver (start of week)		At receiver (current)		At station		En route		CP	Ordered	Confirmed		Surplus	
Sep 12-Sep 18		0		16		14		8		0	50	50		16	
Loading Date/Time		Switch Date/Time		Ordered	Confirmed	Constructively Placed	Placed (Actual or Planned)			Released	Rejected	Shortage / Surplus			
							Empty	Reload	Total						
Sun	12 Sep			0	0	0	16	0	16	0	0	0			
Mon	13 Sep	N/A	Mon 13 Sep 19:00 - 03:00	10	10	0	14	0	14	0	0	+16			
Tue	14 Sep	N/A	Tue 14 Sep 19:00 - 03:00	10	10	0	8	0	8	0	0	0			
Wed	15 Sep	N/A	Wed 15 Sep 19:00 - 03:00	10	10	0	0	0	0	0	0	0			
Thu	16 Sep	N/A	Thu 16 Sep 19:00 - 03:00	10	10	0	0	0	0	0	0	0			
Fri	17 Sep	N/A	Fri 17 Sep 19:00 - 03:00	10	10	0	0	0	0	0	0	0			
Sat	18 Sep			0	0	0	0	0	0	0	0	0			
Totals for Sep 12 - Sep 18				50	50	0	38	0	38	0	0	0			

Figure 6: Car Order tool (Delivery Plan Report)

Delivery Plan Report

Report Criteria: ABC Company, Rail City, IL, 011111, TR01, FLAT BULKHEAD CENTERBEAM

Report Date Range: 2021-09-04 to 2021-09-24

ABC Company
Rail City, IL

Pattern 011111, TR01, FLAT BULKHEAD CENTERBEAM

CCO# 011111

Track TR01

Car Type Flat Bulkhead Centerbeam

Lead Time 24 hrs

Order Cutoff Wed 14:00 ET

Status		At receiver (start of week)		Total Planned Delivery		Total Confirmed		Placed/CP Empty		Released	
Sep 5-Sep 11		8		40		40		30		38	
Switch Date/Time				Total Confirmed	Constructively Placed	Placed (Actual or Planned)			Released	Rejected	Shortage / Surplus
						Empty	Reload	Total			
Sun	05	Sep	19:00 - 03:00	0	0	5	0	5	0	0	+8
Mon	06	Sep	19:00 - 03:00	0	0	0	0	0	0	0	+13
Tue	07	Sep	19:00 - 03:00	10	0	0	0	0	13	0	+13
Loading Date/Time				Ord	Cfm						
Tue 07 Sep N/A				10	10						
Wed	08	Sep	19:00 - 03:00	10	0	16	0	16	9	0	+3
Loading Date/Time				Ord	Cfm						
Wed 08 Sep N/A				10	10						
Thu	09	Sep	19:00 - 03:00	10	0	9	0	9	12	0	+9
Loading Date/Time				Ord	Cfm						
Thu 09 Sep N/A				10	10						
Fri	10	Sep	19:00 - 03:00	10	0	0	0	0	4	0	+8
Loading Date/Time				Ord	Cfm						
Fri 10 Sep N/A				10	10						
Sat	11	Sep	No service	0	0	0	0	0	0	0	-2
Totals for Sep 5 - Sep 11				40	0	30	0	30	38	0	

Shortage of 2 cars from last week was reset to 0 on Sunday. If you still require these cars, please update your orders accordingly.

Status		At receiver (start of week)		At receiver (current)		At station		En route	CP	Ordered	Confirmed	Surplus
Sep 12-Sep 18		0		16		14		8	0	50	50	16
Switch Date/Time				Total Confirmed	Constructively Placed	Placed (Actual or Planned)			Released	Rejected	Shortage / Surplus	
						Empty	Reload	Total				
Sun	12	Sep	19:00 - 03:00	0	0	16	0	16	0	0	0	0
Mon	13	Sep	19:00 - 03:00	10	0	14	0	14	0	0	0	+16
Loading Date/Time				Ord	Cfm							
Mon 13 Sep N/A				10	10							
Tue	14	Sep	19:00 - 03:00	10	0	8	0	8	0	0	0	0
Loading Date/Time				Ord	Cfm							
Tue 14 Sep N/A				10	10							
Wed	15	Sep	19:00 - 03:00	10	0	0	0	0	0	0	0	0
Loading Date/Time				Ord	Cfm							
Wed 15 Sep N/A				10	10							
Thu	16	Sep	19:00 - 03:00	10	0	0	0	0	0	0	0	0
Loading Date/Time				Ord	Cfm							
Thu 16 Sep N/A				10	10							
Fri	17	Sep	19:00 - 03:00	10	0	0	0	0	0	0	0	0
Loading Date/Time				Ord	Cfm							
Fri 17 Sep N/A				10	10							
Sat	18	Sep	No service	0	0	0	0	0	0	0	0	0
Totals for Sep 12 - Sep 18				50	0	38	0	38	0	0	0	

In addition to these eBusiness tools, our customers have the option to subscribe to notifications related to their service. Notification subscriptions are managed per customer location; therefore, a customer can choose to receive a specific set of notifications for one facility and a different set of notifications for another facility. All notifications support email subscription (with the option to add multiple email addresses), and the Advance Arrival Notification supports notification via text messages (SMS) as well. There are numerous notification subscriptions available, including Notify on Arrival (notifying customer that railcars have arrived at a specific location based on specific customer requirements), Constructive Placement Notification (notifying customers that railcars have been constructively placed and are available to be ordered in), and Local Service Notification (notifying customer of all work planned to be performed during the next scheduled assignment at their facility). Some of these notifications are triggered by the local CN train crew using the Mobile Reporting System (MRS) hand-held device, in which CN has invested significantly in recent years in order to facilitate timely and transparent communication of shipment status to our customers. Figure 7 shows an example of the Local Service Notification.

Figure 7: Local Service Notification

 | 

LOCAL SERVICE NOTIFICATION



CN iAdvise - Local Service Notification

Customer:

Location:

Log Reference ID: 2019-0004131546

Assignment:

Track Range: .89

Date: Jun 05, 2019 08:37 EST

The following work will be completed on today's assignment:

Car Summary: 0 to spot, 5 to pull, 0 requiring other work

Work Order	Car	L/E	Commodity	Destination Track
PULL	412568	L	PLPBDFBD N CORR	
PULL	412861	L	PLPBDFBD N CORR	
PULL	412085	L	PLPBDFBD N CORR	
PULL	27620	L	PLPBDFBD N CORR	
PULL	27856	L	PLPBDFBD N CORR	

For more information, please contact your Service Delivery Representative at CNSOUTH@cn.ca or [1-866-926-7245](tel:1-866-926-7245).

CN One contains additional tools as well, such as My Rail Service, which provides customers with details of the scheduled rail service for each of their CN rail-served facilities, and the Trip Plan tool, which provides customers with Estimated and Accomplished times for key events in a shipment's cycle. This entire suite of tools provides customers with effective and efficient access to detailed and meaningful real-time information that affords them visibility into their supply chain and to first mile/last mile service at their facilities.

CN continues to upgrade and add features to CN One. One of the recent features added is application programming interface (API), which allows the data in CN's system to flow directly into the customer's own system for more automated and efficient access to real-time data about their shipment's location and status. And just this month, CN announced a seven-year strategic partnership with Google Cloud to modernize its technology infrastructure and deliver new and better customer experiences. As part of the partnership, CN will develop an intuitive digital platform, ultimately giving customers and supply chain partners more visibility into the logistics journey of planning, shipping, tracking, and payment. In addition, CN proactively works with customers to ensure they are aware of these tools that are available to them. Outside of CN One, CN also annually engages with customers as part of a winter readiness campaign to promote safe and reliable first mile/last mile service during the winter season. All of these efforts reflect CN's overall commitment to meeting the needs of our customers.

II. Real-time, facility-specific information provided directly to our customers are more useful and valuable than any aggregated reporting metric

The Board's request for comment in this docket also asked about potential reporting, noting that some shipper associations have suggested new service metrics to measure first mile/last mile service in addition to the existing reporting that the Board is already collecting about rail service. The Board seeks additional information, including specific suggestions and the benefits and tradeoffs of any potential metric. CN anticipates reviewing any such proposals carefully and commenting on reply.

CN notes that it has been providing aggregated trip plan compliance percentages for its U.S. operations to the Board, including for example annually to the National Grain Car Council.⁵ CN in addition provides the aggregated carload trip plan compliance percentages for its U.S. operations to the staff of the Board's Office of Public Assistance, Governmental Affairs, and Compliance on a monthly basis. For example, in the November 2021 update, CN's carload trip plan performance for 2021 was 92.7%. While these aggregated figures provide a high-level overview of CN's trip plan performance in the United States, they do not provide customers with insight into regional or location-specific first mile/last mile service. Further, although the decision in this proceeding does not identify the goal of any potential reporting requirement, there are inherently significant differences

⁵ Information related to National Grain Car Council meetings, including railroad metrics, are available through the Board's website.

in the individual characteristics of the traffic, customer facilities, and operations involved in first mile/last mile service at hundreds of locations across CN's system that could make an aggregated metric of limited utility. CN believes that the real-time, customer-specific information already provided in CN One are more useful and valuable than any potential form of aggregated data reporting.

III. Conclusion

As explained above, CN currently provides detailed information, notifications, and alerts to our customers through its sophisticated CN One system. Real-time, customer-specific information provided directly to customers, such as through CN One, is the best way for customers to have visibility into their first mile/last mile service. CN will review the opening comments from other parties and address those comments, including any proposed potential new reporting metrics, on reply.

Respectfully submitted,

/s/ Kathryn J. Gainey

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Dated: December 17, 2021

VERIFICATION

I, Jason Hilmanowski, declare under penalty of perjury under the laws of the United States that the factual statements in the foregoing Opening Comments on behalf of CN are true and correct to the best of my knowledge and belief.

A handwritten signature in cursive script that reads "Jason M. Hilmanowski". The signature is written in black ink and is positioned above a horizontal line.

Jason Hilmanowski
General Manager, Supply Chain

Executed on December 17, 2021