

SERVICE DATE – MAY 27, 2025

SURFACE TRANSPORTATION BOARD

NOTICE

Docket No. EP 689 (Sub No. 16)

SIMPLIFIED STANDARDS FOR RAIL RATE CASES—
2023 RSAM and R/VC_{>180} CALCULATIONS

Decided: May 23, 2025

In this decision, the Board is publishing the most recent revenue shortfall allocation methodology (RSAM) and revenue-to-variable cost greater than 180% (R/VC_{>180}) ratios for the Class I carriers (for the years 2020-2023), as well as their four-year averages, for use in Three-Benchmark cases.

Under 49 U.S.C. § 10701(d)(3), the Board is directed to “maintain [one] or more simplified and expedited methods for determining the reasonableness of challenged rates in those cases in which a full stand-alone cost presentation is too costly, given the value of the case.” In Simplified Standards for Rail Rate Cases, EP 646 (Sub-No. 1) (STB served Sept. 5, 2007),¹ the Board modified and clarified its guidelines for such proceedings by establishing a Simplified Stand-Alone Cost test, clarifying its Three-Benchmark approach for the smallest disputes, and establishing eligibility thresholds for each type of case.² The Three-Benchmark approach compares a challenged rate to three measures of the defendant railroad’s revenues and variable costs.

The first benchmark, RSAM, measures the average markup that the railroad would need to charge all its “potentially captive” traffic for the railroad to earn adequate revenues as measured by the Board under 49 U.S.C. § 10704(a)(2). Potentially captive traffic is defined as all traffic priced at or above the 180% R/VC level, which is the statutory floor for regulatory rail rate intervention. See 49 U.S.C. § 10707(d); Burlington N. R.R. v. STB, 114 F.3d 206, 210 (D.C. Cir. 1997); W. Tex. Util. v. Burlington N. R.R., 1 S.T.B. 638, 677-78 (1996). The RSAM benchmark is calculated by adding the carrier’s revenue shortfall (or subtracting the overage) shown in the Board’s annual revenue adequacy determination, adjusted for taxes, to the numerator of the R/VC_{>180} benchmark. Simplified Standards for Rail Rate Cases—Taxes in

¹ Aff’d sub nom. CSX Transp., Inc. v. STB, 568 F.3d 236 (D.C. Cir. 2009), and vacated in part on reh’g, CSX Transp., Inc. v. STB, 584 F.3d 1076 (D.C. Cir. 2009).

² Subsequently, in Rate Regulation Reforms, EP 715 (STB served July 18, 2013), appeal docketed sub nom. CSX Transp., Inc. v. STB, 754 F.3d 1056 (D.C. Cir. 2014), the Board increased the rate relief caps in both the Simplified Stand-Alone Cost test and the Three-Benchmark approach.

Revenue Shortfall Allocation Method, EP 646 (Sub-No. 2), slip op. at 2-3 (STB served May 11, 2009).

The second benchmark is $R/VC_{>180}$. This benchmark measures the average markup over variable cost earned by the defendant railroad on its potentially captive traffic. Simplified Standards for Rail Rate Cases, EP 646 (Sub-No. 1), slip op. at 10. The $R/VC_{>180}$ benchmark is calculated using the Board's confidential Waybill Sample data³ by dividing the total revenues earned by the carrier on potentially captive traffic by the carrier's total variable costs for that traffic. Id. at 20. The ratio of RSAM to $R/VC_{>180}$ provides an estimate of how much more or less the railroad would need to charge its potentially captive traffic to be revenue adequate. Id.

The third benchmark is revenue-to-variable cost comparison (R/VC_{COMP}). This benchmark is used to compare the markup on the challenged traffic to the average markup assessed on other potentially captive traffic involving the same or a similar commodity with similar transportation characteristics. Id. at 10. The R/VC_{COMP} ratio for appropriate comparison traffic is computed using traffic data from the Waybill Sample and applying the Board's Uniform Rail Costing System (URCS). Id. at 10-11.

The Board publishes tables each year showing the most recent RSAM and $R/VC_{>180}$ ratios for each Class I railroad, as well as their rolling four-year averages.⁴ Because R/VC_{COMP} is case specific, that ratio is calculated only after a shipper files a Three-Benchmark rate complaint.

The attached tables contain the most recent RSAM and $R/VC_{>180}$ ratios. Tables I and II represent percentages for the most recent four-year period from 2020 to 2023 for all Class I carriers. The workbooks used to compute the data in these tables are posted on the Board's website at www.stb.gov. Once there, click on the headings "Reports & Data," then "Economic Data," scroll down to the heading titled "Data Issued in Regulatory Proceedings," open the tab titled "Revenue Shortfall Allocation Method (RSAM)," and select the "2023 RSAM Calculation" and "2020-2023 RSAM Table" hyperlinks.

By the Board, Kristen Monaco, PhD, Director, Office of Economics.

³ The Waybill Sample is a statistical sample of railroad waybills collected and maintained for use by the Board and by the public (with appropriate restrictions to protect confidentiality). See 49 C.F.R. pt. 1244.

⁴ In Canadian Pacific Railway Limited—Control—Kansas City Southern, FD 36500 (STB served Mar. 15, 2023), the Board approved a merger that brought Soo Line Railroad Company and Kansas City Southern Railway Company under common control. The merger was consummated on April 14, 2023. As a result, the present decision provides RSAM and $R/VC_{>180}$ calculations for Soo Line and Kansas City Southern as a single entity. To calculate the RSAM for SOO/KCSR, the Average State Tax Rate was calculated by combining both miles and their individual state tax rates from Tax Information for Use in The Revenue Shortfall Allocation Method, EP 682 (Sub-No. 15) (STB served June 7, 2024). The variable costs from the Waybill Sample were combined by adding their corresponding variable costs together.

Table I
RSAM Mark-up Percentages 2020 – 2023

Railroad	4-Year Average	2023	2022	2021	2020
BNSF	182%	204%	182%	175%	166%
CSXT	197%	208%	194%	179%	205%
GTC	317%	323%	315%	338%	293%
NS	237%	287%	195%	209%	256%
KCS			287%	308%	241%
SOO			216%	211%	230%
SOO/KCSR ⁵		430%			
UP	182%	185%	175%	180%	188%

Table II
R/VC_{>180} Percentages 2020 – 2023

Railroad	4-Year Average	2023	2022	2021	2020
BNSF	228%	223%	226%	231%	233%
CSXT	275%	274%	281%	272%	271%
GTC	281%	288%	288%	273%	275%
NS	252%	252%	254%	253%	250%
KCS			244%	238%	246%
SOO			249%	257%	266%
SOO/KCSR ⁶		277%			
UP	253%	248%	247%	254%	261%

⁵ The SOO/KCSR 2023 RSAM is affected by an increase in the Tax-Adjusted Net Investment Base due to the revalued assets and liabilities of KCS associated with the merger implementation.

⁶ The SOO/KCSR 2023 R/VC_{>180} is affected by an increase in the Tax-Adjusted Net Investment Base due to the revalued assets and liabilities of KCS associated with the merger implementation.