

November 17, 2021

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VIA EMAIL

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Re: Deficiencies in CSXT's Opening Evidence

Dear Counsel:

I write about several deficiencies in the production of your opening evidence. First, the CSX Transportation, Inc.'s (CSXT) workpapers produced do not contain all of the output files created by the Rail Traffic Controller model. It is the RTC output files that list each train's speed, run time and dwell time and form the basis of CSXT's argument that adding Amtrak trains to the New Orleans to Mobile corridor will lead to a deterioration in freight traffic service along the route. Without the original output files for each case, Amtrak cannot test CSXT's methodology. Second, there are several missing input files that, for example, do not allow Amtrak to determine how future train growth is calculated. Third, please provide the RTC files listed below. Finally, there are several files that indicate error messages when opened. Please provide corrected versions of those files.

Please see the list of deficiencies below. We ask that CSXT correct them by Friday, November 19, 2021.

Sincerely,

/s/ Kali Bracey

Kali Bracey

CSXT RTC Inputs

1. Please provide the data and worksheets with active calculations showing how “Future Train Lengths” and “Future Train Tonnage” included in tab “Volume Growth” of the e-workpaper “NoBuild Growth Data.xlsx” were calculated.
2. The tab “Raw Data” in e-workpaper “Train Profile Data.xlsx” contains a “#REF” error in Column (H). Similarly, the tab “Filtered Data” in the same e-workpaper contains “#REF” in Column (AD). Please provide a corrected e-workpaper that does not contain reference errors.
3. The “Dwell Analysis” tab in e-workpaper “Train Profile Data.xlsx” produces the following message when the query is run “MdxScript(Model) (6, 36) Failed to resolve name: ‘PERCENTILE.INC’. It is not a valid table or a function name.” Please provide a corrected e-workpaper that contains a functioning query, including providing all worksheets required to run the query.
4. Please provide the table “SG_TRAIN_MOVEMENT” reference in tab “SQL Statement” of e-workpaper “DispatchData.xlsx.”
5. Please explain the note references in cells E7 and E8 on tab “DrawBridges” of e-workpaper “DrawBridgeInputData.xlsx.”

HNTB RTC Inputs

6. Please provide the source and the calculations of the data shown in tab “2039” of e-workpaper “Moveable Bridge Analysis.xlsx.”

RTC Files

7. Please provide the following RTC files used in or produced from each case included in CSXT’s workpapers:
 - a. .ARRIVAL
 - b. .CONFLICT
 - c. .DELAY
 - d. .DWELL
 - e. .EQUIPMENT
 - f. .HOLD

- g. .LOCATION
 - h. .REPORT
 - i. .ROUTE
 - j. .SUMMARY
8. The provided data does not include workpapers which show the development of the RTC train lists. Please provide the workpapers which show how the train list input into the RTC model (the trains shown in the .TRAIN input file) was developed from the train event data provided by CSXT, NS and HNTB.