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950 West Valley Forge Road
King of Prussia, PA 19406
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Surface Transportation Board
Attn: Docket No. EP 385 (Sub-No.8)
395 E Street, S.W.
Washington, DC 20423-0001

To the Surface Transportation Board:

RSI Logistics, Inc. supports the STB's recommendation to change the sampling rate in the Waybill Sample for non-intermodal carload shipments. While the proposal reduces the rate for trainload shipments (over 100 carloads) from 50% to 20%, the benefit to manifest shipments is significant. The proposed increase for 1-2 carloads on a waybill from 2.5% (1/40) to 20% (1/5) will result in a tremendous improvement in the data. Manifest shipments represent a large percentage of the database, and the change would increase both the number of records for any given commodity, as well as the opportunity for additional commodities to be represented.

The Public Use Waybill Sample provides valuable insight into the rail marketplace. By improving the quality and quantity of the information released, there will be enhanced understanding of industry trends. In addition, competition will improve without breaching confidentiality protections.

While the Board is evaluating changes to the Waybill Sample, we request consideration of the following additional recommendations:

- Release the data in a timelier manner. The current lag of 2+ years reduces the value of some of the information. Markets and conditions can change considerably, and by shortening the delay in releasing the information, the data would be more relevant.
- Expand the definition of "reporting carrier" to include holding companies. Rail holding companies that consist of multiple Class II or III railroads should be required to report, if their volume meets the conditions outlined.

Sincerely,

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