

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

**STB DOCKET NO. EP 787
UPDATING CLASS I RAIL CARRIER REPORTING REQUIREMENTS**

Comments of the American Fuel & Petrochemical Manufacturers

I. Introduction

The American Fuel & Petrochemical Manufacturers (“AFPM”) respectfully submits these comments in response to the Surface Transportation Board’s (the “STB” of “the Board”) proposed rule (“NPRM” or the “STB Proposal”) entitled “Updating Class I Rail Carrier Reporting Requirements”, published September 30, 2025.¹ AFPM appreciates the Board’s continued commitment to addressing chronic freight rail service failures and for recognizing the direct connection between transparency, accountability, and reliable data in promoting efficient rail service.

AFPM strongly supports the Board’s efforts to require stronger, standardized, and transparent reporting that ensures both the Board and rail customers can identify and correct service deficiencies promptly. Comprehensive, comparable data across all Class I carriers is critical to understanding where and why failures occur and to enabling effective regulatory oversight and market-based remedies. Broadly AFPM’s comments highlight:

- All service data must be standardized, transparent, and verifiable to ensure accuracy, comparability, and meaningful oversight across all Class I carriers.
- The Board’s proposal to measure on-time performance through Original Estimated Time of Arrival (OETA) reporting will provide critical insight into rail service reliability and shipment timeliness.
- The Industry Spot and Pull (ISP) metric as a valuable tool for tracking first-mile/last-mile service quality.

II. AFPM’s Interest in the Rulemaking

AFPM is the leading trade association representing the manufacturers of the fuels that power the U.S. economy and the petrochemicals that form the building blocks of essential consumer and industrial products. Our members produce the fuels that drive the U.S. economy and the chemical building blocks integral to millions of products that make modern life possible. To produce essential goods. To produce and distribute these essential goods, our members depend on consistent and reliable rail service to transport crude oil, refined products, and petrochemical feedstocks to and from facilities nationwide.

Refineries and petrochemical manufacturers rely on a healthy rail network as a vital part of their supply chains. Annually in the United States, over 2.5 million carloads of our members’ feedstocks and products, including crude oil, natural gas liquids, refined products, plastics, and synthetic resins, are transported by rail.² Further, AFPM members are increasingly relying on rail to support and grow our industries. Further, consumers depend on affordable gasoline and petrochemical based products, and they foot the bill when railroads are allowed to hamstring and delay distribution of those products across the country. The STB’s NPRM, along with other concurrent proposed reforms, are a positive step toward improving how the STB addresses freight rail problems. AFPM is eager to work with the STB members and their staff to provide them with

¹ See 90 FR 46779, [Updating Class I Rail Carrier Reporting Requirements](#), Docket No. EP 787, Published September 30, 2025.

² See “[Association of American Railroads Data Center](#)” access October 2025.

valuable information and data the STB needs to provide oversight of freight rail transportation. AFPM is encouraged that STB is seeking ways to improve data reporting, an integral component of carrier accountability.

Rail service disruptions impose substantial operational and economic costs on our members and the broader public, particularly for facilities. As such, AFPM has a strong interest in data-driven policies that hold railroads accountable and empower shippers with the transparency needed to seek timely remedies.

III. AFPM's General Comments on the Data Collection

AFPM supports the Board's objective to strengthen its ability to monitor the health and efficiency of the national freight rail network through improved, standardized reporting. A reliable rail system is essential to the smooth flow of goods that sustain everyday life and the broader U.S. economy. Enhanced service data will allow the Board, policymakers, and the public to identify where performance is deteriorating, diagnose congestion, and monitor service trends. These data are not merely compliance tools—they are vital indicators of network health that can guide timely interventions and prevent localized issues from escalating into widespread disruptions.

To ensure these data are meaningful, AFPM urges the Board to prioritize consistency, clarity, and accountability in definitions, methods, and verification. Standardized metrics and clear calculation methodologies will make performance results comparable across carriers and over time. Reporting should be granular—broken out by region, terminal, and corridor—to reveal localized bottlenecks often masked by system averages.

Finally, AFPM recommends that all data be both machine- and human-readable and presented in standardized formats to prevent opacity and enable efficient analysis. Shippers should have the ability to audit or correct carrier-submitted data to ensure accuracy, as they are often best positioned to identify discrepancies. The Board should adopt safeguards such as penalties for chronic misreporting or attempts to obscure service degradation. Together, these measures will strengthen transparency, promote accountability, and enable data-driven oversight to support a more reliable and efficient rail network.

IV. AFPM's Specific Comments on Proposed Changes in Data Collection

A. Positive Train Control Reporting

The Rail Safety Improvement Act of 2008 (RSIA) required Class I rail carriers to implement Positive Train Control (PTC)—an automated safety technology designed to prevent certain types of train accidents—on main lines with passenger service or significant volumes of toxic-by-inhalation hazardous materials.³ Following several extensions under the Positive Train Control Enforcement and Implementation Act of 2015,⁴ full implementation was achieved by December 29, 2020. The Federal Railroad Administration (FRA) certified that PTC was

³ See 49 U.S.C. § 20157

⁴ *Id.*

operational on all required freight and passenger routes and in full compliance with technical standards.

To monitor these investments, STB in 2013 required Class I railroads to file supplemental PTC expenditure data as part of their annual R-1 reports. This information helped the Board and other federal agencies assess the financial and operational impacts of PTC implementation. Now that the technology has been fully deployed and integrated into the railroads' broader signal and communications systems, the continued collection of separate PTC data no longer serves a meaningful regulatory purpose.

AFPM supports the Board's proposal to phase out the PTC Supplement reporting requirement as it is no longer necessary. Retiring the supplemental reporting will streamline compliance obligations, reduce administrative burdens, and align with the goals of 49 U.S.C. 10101 to minimize unnecessary federal oversight while ensuring the availability of accurate cost information.

AFPM agrees that requiring one final summary of major PTC-related expenditures, as proposed, will provide adequate transparency and closure to this decade-long initiative. The successful nationwide implementation of PTC represents a major safety achievement, and its completion allows both regulators and carriers to focus resources on monitoring the efficiency, reliability, and performance of the rail network as a whole.

B. Original Estimated Time of Arrival (OETA)

The Board proposes to introduce a new performance metric—On-Time Estimated Time of Arrival (OETA)—to measure each carrier's success in meeting its own projected delivery times. Under the proposal, OETA would be defined as the estimated arrival time provided by a rail carrier when a shipper tenders a bill of lading or when the carrier receives a shipment from an interchanging carrier. Each Class I railroad would report, on a weekly basis, the percentage of manifest shipments delivered to their destinations within 24 hours of the estimated arrival time, relative to all manifest shipments moved that week.

By requiring OETA reporting, the Board seeks to gain clearer insight into the timeliness and reliability of manifest service across the network. Late deliveries can trigger significant downstream effects, including production slowdowns, supply chain disruptions, and higher inventory costs for shippers. Chronic delays may also prompt shippers to order redundant shipments or maintain larger private car fleets, adding to network congestion and inefficiency.

AFPM agrees with the Board that the OETA metric should measure a carrier's success in meeting its estimated arrival times for shipments. In the NPRM, the Board defines the OETA metric as:

“The OETA metric is the percentage of shipments on a carrier's system that moved in manifest service and were delivered to the designated destination no later than 24 hours after the OETA, out of all shipments on the carrier's system that moved in manifest service during that week. For the purpose of calculating the OETA metric, once a carrier has

communicated an OETA to a customer, that time shall not be changed by any subsequent changes to the original trip plan of the car, unless the change to the original trip plan is made by the shipper.”

AFPM supports the requirement that railroads report the percentage of late shipments every week, but recommends that railroads also report average lateness (in hours) for all shipments that miss their OETA. This contextual measure will prevent carriers from meeting minimum success rates while permitting excessive delays on outlier shipments. Over time, this metric will help identify systemic inefficiencies even when the success rate nominally meets the threshold.

C. *Industry Spot and Pull (ISP)*

The Board proposes to establish a new performance metric—Industry Spot and Pull (ISP)—to measure how effectively rail carriers perform local switching activities, specifically the placement (“spot”) and pick-up (“pull”) of railcars at shippers’ and receivers’ facilities during designated service windows. The metric would apply to manifest traffic only and would exclude unit train and intermodal operations.

Under the proposal, ISP performance would be calculated by comparing the number of cars that the carrier successfully spots or pulls within the agreed service window to the total number of cars for which a shipper or receiver requested service by the applicable cut-off time. For example, if a carrier delivers nine of ten requested cars within the scheduled spot window and pulls seven of ten requested cars within the scheduled pull window, its ISP performance rate would be 80%.

Carriers would report ISP performance at both the system-wide and operating division levels, with the flexibility to define their reporting regions based on existing business practices. Each carrier would be required to clearly identify the geographic boundaries used in its reports to ensure transparency and comparability across systems.

The Board’s proposed Industry Spot Pull (“ISP”) service standard would measure a rail carrier's success in performing local deliveries (“spots”) and pick-ups (“pulls”) of loaded railcars and unloaded private or shipper leased railcars during the planned service window. The ISP standard would serve to determine the adequacy of rail service for those local deliveries and fulfillments. Specifically, in the NPRM, the Board defines the ISP metric as:

“The ISP metric is the percentage of scheduled spots or pulls (i.e., those requested by a shipper or receiver before the applicable cut-off time) that were successfully performed during the planned service windows, out of the total number of spots or pulls that were scheduled for that week. A rail carrier must report the ISP metric for each of its operating divisions and for the carrier's overall system. For reporting at the operating division level, a rail carrier may establish reporting regions using any geographic boundaries it chooses, provided that the rail carrier identifies the boundaries as part of its reporting.”

AFPM urges the Board to ensure that “planned service windows” are jointly established and verified by both the railroad and the customer to prevent unilateral changes that artificially

inflate compliance rates. Reporting should also include the average number of delay hours per missed switch, as this measure reflects the real operational and economic impact of poor FMLM service.

V. Conclusion

AFPM thanks the Board for its leadership in developing a stronger, more transparent framework for monitoring rail service performance. This NPRM is an important and pragmatic step toward ensuring that the nation's freight rail system remains efficient, reliable, and responsive to the needs of shippers and the broader economy.