CPKC-1

BEFORE THE SURFACE TRANSPORTATION BOARD

FINANCE DOCKET NO. 36500 (SUB-NO. 6)

CANADIAN PACIFIC RAILWAY LIMITED, ET AL. – CONTROL – KANSAS CITY SOUTHERN, ET AL.
(GENERAL OVERSIGHT)

CPKC'S OCTOBER 15, 2023 DATA SUBMISSION

In accord with Oversight Decision No. 1 served on September 1, 2023, Canadian Pacific Kansas City Limited ("CPKC"), on behalf of itself and its U.S. rail carrier subsidiaries,[1] provides this initial data submission.

As CPKC's initial data submission, this report provides the following:

(1)   Interchange Data.

      a.   The requisite monthly data relating to interchange volumes at selected gateways for the months since consummation of the CP/KCS Transaction on April 14, 2023 – *i.e.*, May 2023 through September 2023;

      b.   Monthly interchange data covering the five-year lookback period of April 2018 through April 2023;

      c.   Explanations of the methodologies used by CPKC to calculate car and unit miles associated with reported interchange volumes; and

      d.   Explanations of CPKC's designation of certain reported data as Highly Confidential subject to the Protective Order entered in this proceeding.

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[1]   CPKC's U.S. rail carrier subsidiaries include Soo Line Railroad Company; Central Maine & Quebec Railway US Inc.; Dakota, Minnesota & Eastern Railroad Corporation; Delaware & Hudson Railway Company, Inc. (collectively "CP" or "CP/Soo"); The Kansas City Southern Railway Company, Gateway Eastern Railway Company, and The Texas Mexican Railway Company (collectively, "KCSR").

(2)   Customer Experience Data.

    a.   The requisite weekly customer experience data for the period since consummation of the Transaction – *i.e.,* the Saturday-to-Friday weeks encompassing the period from April 15, 2023 through September 29, 2023 – for metrics not reported separately in Dockets Ex Parte No. 724 and Ex Parte No. 770;

    b.   Explanations of the methodologies CPKC used to calculate the reported metrics; and

    c.   Benchmarks for the three customer experience metrics that underlie CPKC's Service Action Plan commitments.

(3)   Operational Data.

    a.   The requisite weekly data relating to operational metrics for the period since consummation of the Transaction – *i.e.,* the Saturday-to-Friday weeks encompassing the period from April 15, 2023 through September 29, 2023;

    b.   Weekly data, to the extent available, covering the five-year lookback period of April 14, 2018 through April 14, 2023; and

    c.   Explanations of the methodologies CPKC used to calculate the reported metrics, including limitations on the availability of data where applicable.

I.   INTERCHANGE DATA

A.   Current Month (and Other Post-Control) Data.

CPKC is simultaneously filing in this docket an Excel file based on the template supplied by Board Staff providing monthly interchange data for the period since April 2018. In accord with the protocols conveyed by Board Staff, that file is named

"STB_FD_36500_6_GATEWAY_HC_2023_10_202310121137.csv." As explained below, CPKC has designated that file as Highly Confidential in its entirety.

CPKC is separately filing a public file containing aggregate interchange data for each of the specified gateways. That file, named "STB_FD_36500_6_GATEWAY_PUBLIC_2023_10_202310101720.csv," reports the aggregate number of carloads and intermodal units interchanged by CPKC for all interchange partners and all commodities at each gateway (separately for units delivered and received).

B.   Data for Five-Year Lookback Period

The files referenced above provide data, including car/unit miles calculations, for the entire five-year lookback period.

C.   Methodologies for Interchange Volumes and Car/Unit Miles Calculations

The reported interchange volume counts were developed using Rule 260 junction codes contained in the routing fields of CP's and KCSR's revenue waybill records. CPKC is providing in Appendix A a list of the Rule 260 junction codes (and corresponding FSAC designations) that CPKC used to identify carloads and intermodal units that were interchanged at the specified gateways. CPKC is providing the same information in the accompanying file named "STB_FD_36500_6_GATEWAY_DEFINITIONS_2023_10_202310101720.csv.

The waybill records used to determine interchange volumes contain fields that report the estimated distance that the shipment travelled on the carrier's network. These distance figures are commonly referred to as "system miles," and include the distance travelled on the carrier's lines as well as on other carriers' lines under trackage rights or via haulage rights. For both CP and KCSR, distances were developed based on mileage-tables specific to the segments that the shipment traversed. For CP cross-border movements, reported mileages include movement from origin to interchange or interchange to destination on the CP system in both the United States

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and Canada. For KCS cross-border movements, system miles from separate KCSR and KCSM portions of the KCS system movement were added together from separate waybill records relating to the same movement to yield a combined KCS system mileage .

D.   Explanations for Redactions

CPKC has designated the detailed interchange data reported in File "STB_FD_36500_6_GATEWAY_HC_2023_10_202310121137.csv" (reporting volumes and car/unit miles by railroad and by 2-digit STCC) as Highly Confidential under the Protective Order in this proceeding. Such data is commercially and competitively sensitive because it would provide CPKC's competitors with an extraordinary degree of insight into the breakdown and routing – nearly in real-time on a monthly basis – of the rail traffic that shippers have chosen to route via the CPKC network. With access to this information, CPKC's rivals would be able to detect opportunities to punish shippers (or connecting railroads) responsible for traffic shifts, or to compete less aggressively, than would be the case were they to have less visibility into the details of CPKC's traffic flows.

CPKC understands the Board's desire for transparency with respect to the implementation of the CP/KCS combination. However, such transparency should not come at the cost of asymmetric access to competitively sensitive traffic data. That is especially so given that CPKC is filing in the public record (in file "STB_FD_36500_6_GATEWAY_PUBLIC_2023_10_202310101720.csv") aggregated information on interchange volumes at each of the specified gateways: specifically, (a) the aggregate carloads and intermodal units received (all railroads, all commodities) and (b) the

aggregate carloads and intermodal units forwarded (all railroads, all commodities).[2] This

aggregated information will allow the public to observe broad patterns relating to CPKC's

interline traffic flows, while interested parties will have fuller access to the underlying details

both through their own knowledge of traffic flows and the access their outside counsel and

consultants will have (pursuant to the Protective Order) to the detailed data CPKC is filing.

II.   CUSTOMER EXPERIENCE DATA

Data for the customer service metrics not already reported by CPKC in dockets Ex Parte

No. 724 and Ex Parte No. 770 is provided, in accord with the template conveyed by Board Staff,

in the file "STB_FD_36500_6_CUSTOMER_2023_10_202310131725.csv" (the "Customer

Data File").

A.   Metra OTP Data.

Oversight Decision No. 1 requires CPKC to report "on delays caused to Metra trains by

CPKC freight trains on Metra's Milwaukee District-West ["MD-W"] Line and Milwaukee

District-North ["MD-N"] Line, to the extent Metra provides data and detailed information to

CPKC." Oversight Decision No. 1 at 8. The Customer Data File reports this data on a weekly

basis for the period since April 15, 2023. These data are derived from reports generated by

Metra and provided to CPKC concerning the "on-time performance" of Metra trains, using

Metra's definition of a delayed train as one that arrives more than six minutes late at its

destination and Metra's classification of "delay cause" as being "freight train interference." The

data in the Customer Data File reflect delays caused by CPKC freight trains and excludes

"freight train interference" delays caused by freight trains operated by others (most commonly

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[2]   In this aggregation, CPKC has excluded carloads and units interchanged between CP/Soo and
KCSR at Kansas City from the reported interchange counts, so that the public can discern trends in
CPKC's interchanges with foreign carriers at Kansas City.

CN freight trains at the CN/MD-N Line level crossing at Grayslake, IL and the CN/MD-W Line level crossing at Spaulding, IL).[3]

Table 1 below summarizes the same data by month since May 2023, consistent with how Metra reports its on-time performance data publicly. Table 1 reflects the number and percentage of Metra trains delayed by CPKC freight trains on the MD-W and MD-N lines during each month, and explains the differences between the figures CPKC is reporting and the total "freight train interference" figures reported by Metra in its monthly public on-time performance reports.[4]

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[3]   Some of the delays reported by Metra and attributed to CPKC freight train interference involve "mechanical" issues outside of the control of CPKC rather than dispatching or other actions that Metra categorizes as "controllable. CPKC has reported all delays attributed by Metra to CPKC freight trains, regardless of underlying cause.

[4]   Metra's public On-Time Performance reporting provides aggregate figures that include all delays caused by "foreign" freight train interference, and thus does not distinguish between freight train interference caused by CPKC trains and that caused by trains of other freight railroads operating over, or crossing, Metra's lines.

TABLE 1

Metra Line	Period	Metra Delays Attributed to CPKC Freight Train Interference	Total Metra Trains Scheduled	Percentage of Metra Trains with Delays Attributed to CPKC Freight Train Interference	Difference, if Any, from Total FTI Figures in Metra's Public On-Time Performance Reports
MD-N Line					
MD-N	May 2023	0	1,314	0.00%	Metra's May 2023 On-Time Performance Report (showing 1 FTI delay) included 1 delay caused by CN freight train.
MD-N	June 2023	4	1,296	0.31%	Metra's June 2023 On-Time Performance Report (showing 11 FTI delays) included 2 delays caused by Metra geometry truck; 5 delays caused by CN freight trains.
MD-N	July 2023	2	1,248	0.16%	No difference.
MD-N	Aug. 2023	1	1,358	0.07%	No difference.
MD-N	Sept. 2023	1	1,230	0.08%	Metra has not yet released its September 2023 On-Time Performance Report
MD-W Line					
MD-W	May 2023	3	1,330	0.23%	No difference.
MD-W	June 2023	2	1,312	0.15%	No difference.
MD-W	July 2023	0	1,268	0.00%	No difference.
MD-W	Aug. 2023	1	1,374	0.07%	Metra's August 2023 On-Time Performance Report (showing 2 FTI delays) included 1 delay caused by CN freight train.
MD-W	Sept. 2023	1	1,250	0.08%	Metra has not yet released its September 2023 On-Time Performance Report

Table 2 below summarizes the delay data as reported by Metra for the full year 2022 with respect to "freight train interference" on Metra's MD-N and MD-W lines.[5]

TABLE 2

Metra Line	Period	Total Metra Trains Operated	Delays Attributed to Freight Train Interference (All Carriers)	Percentage of Metra Trains Delayed by Freight Train Interference (All Carriers)
MD-N	Full Year 2022	11,966	63	0.53%
MD-W	Full Year 2022	12,647	89	0.70%

B. Wylie Intermodal Terminal On-Time Departures Data

This metric is reported on a weekly basis for the period since April 15, 2023 in the Customer Data File.

CPKC is reporting the percentage of intermodal trains departing Wylie Intermodal terminal on time on a weekly basis since consummation of CP control of KCS. Trains are considered on-time if the departure occurs three hours early relative to scheduled time of departure and up to one hour late.

C. Meridian Speedway Average Train Speed Data

This metric is reported on a weekly basis for the period since April 15, 2023 in the Customer Data File.

CPKC is reporting the average train speed for all through trains operating across the Meridian Speedway between Shreveport and Meridian on a weekly basis since consummation of CP control of KCS. KCS calculates speed for each train as train miles divided by train hours.

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[5]   Because they are drawn from Metra's public On-Time Performance reports for 2022, these figures include delays caused by non-CPKC freight trains.

Train hours encompass the travel time for line-haul movement from origin to destination between terminals excluding time in terminals. Delay hours associated with foreign railroads, acts of God, customer issues (e.g., ability to receive a train), and maintenance of way are removed from the travel time. Average train speed is calculated as the average train speed in miles per hour weighted by miles. Local, passenger, maintenance of way trains and yard jobs are excluded from train speed measurements.

D. **Service Action Plan Metric Methodologies**

CP and KCS have previously explained the methodologies they use to calculate the metrics they separately report in dockets Ex Parte No. 724 and Ex Parte No. 770.[6] We have compiled those explanations, with some additional explanatory content, in Appendix B hereto.

CPKC anticipates transitioning to reporting in Ex Parte No. 724 and Ex Parte No. 770 on a combined system basis. When it does so, it will report on the methodologies used to calculate the combined CPKC metrics, and it will also explain how it rebases the 2022 benchmarks for the three Service Action Plan metrics (which are discussed in the next section).

E. **Service Action Plan Metric Benchmarks**

As set forth in Decision No. 35 (at 141-42), CPKC committed to develop Service Action Plans in the event specified thresholds are triggered by trends in three customer experience metrics: Manifest Carloads On Time (based on EP 770 Item 7(i)), First/Mile/Last Mile (Industry

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[6]   See *Urgent Issues in Freight Rail Service – Railroad Reporting*, Docket No. EP 770 (Sub-No. 1) ("*EP 770*"), CP (Soo) Reporting Methodology (filed June 3, 2022); *EP 770*, Letter from David C. Reeves (KCS counsel) to Honorable Cynthia T. Brown (filed May 18, 2022); *EP 770*, Letter from David C. Reeves (KCS counsel) to Honorable Cynthia T. Brown (filed May 25, 2022); *United States Rail Service Issues – Performance Data Reporting*, Ex Parte No. 724 (Sub-No. 4) ("*EP 724*"), CP/Soo Metrics Definitions & Methodology (dated May 1, 2017), *available at* https://www.stb.gov/wp-content/uploads/ CP_Methodology.pdf; *EP 724*, KCSR Explanation of Methodology for Reports under STB Ex Parte No. 724, Sub-No. 4, *available at* https://www.stb.gov/wp-content/uploads/ KCS_Methodology.pdf.

Spot and Pull) (based on EP 770 Item 5), and Bulk Train On Time (based on EP 770 Item 7(i)).

See Applicants' Final Brief, Appendix A, p. A9.

The average performance level achieved by CP and KCS in 2022, and the resulting

Service Action Plan benchmarks, are set forth in Table 3 below:

TABLE 3
SERVICE ACTION PLAN METRIC BENCHMARKS

METRIC	CP		KCSR	
	2022 AVERAGE	BENCHMARK (AVERAGE LESS 15%)	2022 AVERAGE	BENCHMARK (AVERAGE LESS 15%)
Manifest OTP (EP 770 Item 7(i))	70.0%	55.0%	76.0%	61.0%
FMLM (Industry Spot and Pull) (EP 770 Item 5)	86.0%	71.0%	95.6%	80.6%
Bulk OTP (EP 770 Item 7(i))[7]	96.1%	81.1%	94.5%	79.5%

For each of these metrics, Appendix C hereto reports the values reported pursuant to Ex

Parte No. 770 (Sub-No.1) (or, in the case of the bulk train OTP, the aggregate of the reported

metrics) for the period since CP acquired control of KCSR on April 14, 2023. Appendix C also

reports the four-week rolling average figures used to assess trends in performance relative to the

applicable benchmarks.

III.   OPERATIONAL DATA

Data for the operational metrics is provided, in accord with the template conveyed by

Board Staff, in the file "STB_FD_36500_6_OPERATIONAL_2023_10_202310151150.csv"

(the "Operational Data File").

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[7]   This metric is a train-count weighted aggregate of the commodity-by-commodity bulk train metrics reported pursuant to Ex Parte No. 770 (Sub-No. 1).

A. Current Month (and Other Post-Control) Data.

The Operational Data File provides weekly data for the Saturday-to-Friday weeks for the period between April 15, 2023 and September 29, 2023.

B. Data for Five-Year Lookback Period

The Operational Data File also provides weekly data for the period between April 14, 2018 and April 14, 2023, to the extent available. As explained below, CPKC is unable to report certain metrics for the full five-year lookback period as a result of data limitations.

C. Methodologies and Limitations for Reported Metrics

1. Polo Line in Missouri

Number of Trains per Day (CPKC and UP)

> For CPKC/CP trains: CPKC used CPKC (or CP) Train Event data to identify the discrete CPKC (or CP) through trains that reported both a departure or arrival at Kansas City, MO and a departure or arrival at Polo, MO.

> For UP trains: CPKC used train movement records from wayside detectors between Kansas City and Polo to generate a list of unique movements for all trains that operated on the segment and deducted from that roster the trains known to be CP movements. The remainder were deemed to be UP trains.

> CPKC reported the calculated the average number of trains per day that traversed the segment during the Reporting Week, separately for CPKC/CP and UP.[8]

> These data are being reported for the entire five-year lookback period.

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[8]   For this and all other segments, CPKC counted trains of all types, including work trains, that traversed the entire segment. Trains were counted as operating during the Reporting Week based on the date and time of their arrival at the endpoint of the segment.

For this and other segments for which Train Event data was used to identify trains, CPKC filtered the data to eliminate incorrect and aberrant data, such as "trains" with a length under 300 feet, the absence of a locomotive, or a transit time shorter than the minimum possible in light of permissible track speeds.

Train Lengths (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC determined the train's length using the figures recorded in CPKC/CP Train Event data. Where the recorded length of a particular train varied across the segment, CPKC used the highest figure. CPKC reported the length of the longest train during the Reporting Week. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train.

These data are reported for the entire five-year lookback period.

Transit Times (CPKC)

For each CPKC (or CP) through train identified as traversing the segment during the Reporting Week, CPKC calculated the transit time using train movement details recorded in CPKC/CP Train Event data, specifically the time difference between AEI reader events (or other reporting where AEI reader data was unavailable) at Kansas City (specifically Knoche Yard or Airline Junction). The calculated transit time was the difference between the latest time at the beginning of the segment and the earliest time at the end of the segment. CPKC reported the maximum transit time during the week and the calculated average transit time.

These data are being reported for the entire five-year lookback period.

2. Twin Cities Area

Number of Trains per Day (CPKC, CN)

For CPKC trains, CPKC used CPKC (or CP) Train Event data to identify the discrete CPKC (or CP) through trains that reported both a departure or arrival at one of three stations at the Hoffman Avenue end of the segment (specifically Hoffman (FSAC 00672), St. Paul (FSAC 04850) and Daytons Bluff (FSAC 4931)) and an arrival or departure at one of five stations at the Northtown/Shoreham end of the segment (specifically, Minneapolis Shoreham (FSAC 04868), Minneapolis IMS (FSAC 04865), Minneapolis Marshall St. (FSAC 04864), Camden Place (FSAC 04870) and Minneapolis Humboldt (FSAC 04871)).

CPKC identified the route used by each of these trains using events recorded in the same data and knowledge that the great preponderance of eastbound trains are routed via one of the two BNSF routes, and the great preponderance of westbound trains are routed via the CPKC

Withrow/St. Paul Subdivision route. If a train recorded an event at an AEI reader on one of the two BNSF routes (specifically AEI readers on BNSF's Midway and St. Paul Subdivisions near St. Anthony), the train was assigned to that BNSF route. Data from the BNSF AEI reader on BNSF's St. Paul Subdivision was available only for the period since September 2021. (There is no AEI reader on the CPKC Withrow/St. Paul Subdivision route between Hoffman Ave. and Northtown/Shoreham.) When there was no intermediate event for an eastbound train, the train was assigned to the BNSF Midway Subdivision, which in CPKC's experience is the route most commonly chosen by BNSF dispatchers. When there was no intermediate event for a westbound train, it was assigned to the CPKC Withrow/St. Paul Subdivision route.

CPKC reported the calculated average number of trains per day, by route, that traversed the segment during the Reporting Week.

The Train Event data permitting the identification of CPKC (or CP) through trains is available for the entire five-year lookback period; the AEI reader data allowing CPKC to determine which of the two BNSF routes a CPKC train used is available only for the period since late September 2021, and during that period remains subject to CPKC access to BNSF data. For the period prior to late September 2021, or for other periods when such data is not available, CPKC has reported all westbound trains as using the CP Withrow/St. Paul routing and all eastbound trains as using the BNSF Midway Subdivision route.

For CN trains on CP's Withrow Subdivision, CPKC used an AEI reader located east of Cardigan Junction, where CN trains enter/exit CP's Withrow Subdivision (AEI reader 1009) to identify the discrete CN trains, if any, that operated over CP's Withrow Subdivision between Cardigan Junction and Northtown/Shoreham. CPKC reported the calculated average number of trains per day during the Reporting Week.

Train Lengths (CPKC by route)

For each CPKC (or CP) through train identified as traversing the segment during the Reporting Week, CPKC determined the train's length using the figures recorded in CPKC/CP Train Event data. Where the recorded length of a particular train varied across the segment, CPKC used the highest figure. CPKC reported the length of the longest train during the Reporting Week. CPKC reported the number of trains with a length in excess of 10,000 feet. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train.

These data are being reported for the entire five-year lookback period.

Transit Times (CPKC by route)

For each CPKC (or CP) through train identified as traversing the segment during the Reporting Week, CPKC calculated the transit time using train movement details recorded in CPKC/CP Train Event data, specifically the time difference between the recorded train events at a station on the north (Northtown/Shoreham) end of the segment and a station at the south (Hoffman Ave.) end of the segment as noted above. The calculated transit time was the difference between the latest time at the beginning of the segment and the earliest time at the end of the segment. CPKC removed a very small number of aberrant outlier transit times (less than 0.1% of records) where the pertinent train event time entries were obviously incorrect. Separately for the four route segments (to the extent data allows determination of route, as noted above), CPKC reported the maximum transit time during the Reporting Week and the calculated average transit time, in all cases reporting times for the entire movement between Northtown/Shoreham and Hoffman Avenue.

These data are being reported for the entire five-year lookback period.

3. **Texas – Neches River Bridge**

   Number of Trains per Day (CPKC, Other Railroads).

   For CPKC trains, CPKC used PTC on-board GPS data to identify the discrete trains that that occupied 75 percent of the segment between the west end of the Neches River Bridge (KCSR MP 766.0) and the KCSR-UP connection east of the Bridge (known as UP Junction, KCSR MP 764.8) (the "Bridge Block"). (Note that this list may include some trains that did not cross the Bridge, but merely moved into and out of the block on one side of the Bridge.)

   For Non-CPKC trains, CPKC used PTC data (from the PTC systems on these trains initialized for movement across KCSR trackage) to identify the discrete trains that occupied 75% of the Bridge Block. CPKC identified the operator of the train as follows: Amtrak trains were identified based on the lead locomotive or the train symbol; non-CPKC freight trains were determined to be UP or BNSF trains based on data captured in the ordinary course of PTC operations. Reporting for trains of other railroads is limited by the reliability of the PTC data provided by that railroad to CPKC.

   CPKC reported the maximum number of trains in a day during the Reporting Week and the calculated average number of trains per day during that period, separately for CPKC, Amtrak, BNSF, and UP.

   The PTC data used to identify trains crossing the Neches River Bridge is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC identified the total number of CPKC trains crossing the Bridge using KCSR Train Event data to identify trains with events at Beaumont or other stations both south/west of the Bridge and Vidor, LA or other stations north/east of the Bridge. CPKC is unable to identify trains of other railroads for the period prior to January 1, 2021 because neither KCSR Train Event nor any other data source available to CPKC covering the period prior to January 2021 provides a feasible and reliable means of doing so.

Train Lengths (CPKC, Other Railroads).

For each train identified as crossing the Neches River Bridge during the Reporting Week, CPKC determined the train length using the figures recorded in PTC data, including PTC data for other railroads whose trains were initialized on CPKC's/KCS's PTC system. CPKC reported the length of the longest train during the Reporting Week, separately for each railroad. CPKC reported the number of trains with a length in excess of 10,000 feet, also separately for each railroad. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train, also separately for each railroad. Reporting for trains of other railroads is limited by the reliability of the PTC data provided by that railroad to CPKC.

The elements of PTC data permitting determination of train lengths are available only for the period since May 2022. For the remainder of the five-year lookback period (April 14, 2018 through May 2022), CPKC determined the length of CPKC trains crossing the Bridge using KCSR Train Event data. CPKC is unable to determine the lengths of non-CPKC trains for the period prior to May 2022.

Occupancy Time (CPKC, Other Railroads)

For each train identified as crossing the Neches River Bridge during the Reporting Week, CPKC calculated Bridge occupancy time using PTC on-board GPS data to measure the time between the train's entry into the Bridge block (*i.e.*, the first time the train occupied the block) and the train's exit from the Bridge block (*i.e.*, the last time the train occupied the block). CPKC reported the total number of occupancy minutes per day and the calculated average occupancy time per train, separately for each railroad. Reporting for trains of other railroads is limited by the reliability of the PTC data provided by that railroad to CPKC.

The elements of PTC data permitting the calculation of occupancy times is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC is unable to calculate comparable occupancy times, since neither KCSR Train Event nor any other data source available to CPKC covering the period prior to January 2021 provides a feasible and reliable means of identifying train entry and exit times at the Neches River Bridge.

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Minutes Held Prior to Bridge (CPKC, Other Railroads)

For each train identified as crossing the Neches River Bridge during the Reporting Week, CPKC used PTC on-board GPS data to determine the train's route of movement prior to arrival at the Bridge, and used the same data to measure the amount of time each train dwelled (*i.e.*, was not moving for a period of two minutes or more) between a specific start point and arrival at the Bridge.

Westbound trains using KCSR route from DeQuincy, LA: between Vidor (KCSR Beaumont Subdivision MP 760.4) and Bridge.

Westbound trains using UP/BNSF route: between last siding (Connell) on UP Lafayette Subdivision (UP Lafayette Subdivision MP 272.7) and Bridge.

Eastbound trains from Beaumont and west on UP Beaumont Subdivision: between west end of Amelia Siding (UP Beaumont Subdivision MP 450.7) and Bridge.

Eastbound trains from Beaumont and west on UP Houston Subdivision: between east end of China Siding (UP Houston Subdivision MP 297.6) and Bridge.

Eastbound CPKC trains from Port Arthur: between Port Arthur (KCSR Beaumont Subdivision MP 786.1) and Bridge.

CPKC reported the calculated average number of minutes per train, separately by railroad.

The elements of PTC data permitting calculations of hold times are available only for the period since June-September, 2022 (with the initial period of availability depending on the route being measured). For the remainder of the five-year lookback period (April 14, 2018 through June-September 2022), CPKC is unable to calculate comparable occupancy times, since neither CPKC Train Event nor any other data source available to CPKC covering that period provides a feasible and reliable means of identifying train dwell times on the relevant segments.

4. Texas – Beaumont to Rosenberg

Number of Trains per Day (CPKC)

CPKC used PTC on-board GPS data to identify the discrete CPKC (or KCSR) through trains that reported both a departure or arrival at Beaumont, TX and a departure or arrival at Rosenberg, TX. CPKC reported the calculated average number of trains per day that traversed the segment during the Reporting Week.

The PTC data used to identify trains across this segment is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC used KCSR Train Event data to identify the discrete KCSR through trains that reported both a departure or arrival at Beaumont and a departure or arrival at Kendleton (approximately ten miles west of Rosenberg) during the Reporting Week.

Train Lengths (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC determined the train's length using the figures recorded in PTC data. Where the recorded length of a particular train varied across the segment, CPKC used the highest figure. CPKC reported the length of the longest train during the Reporting Week. CPKC reported the number of trains with a length in excess of 10,000 feet. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train.

The PTC data used to determine train lengths is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC determined train lengths for the identified trains using KCSR Train Event data.

***Transit Times (CPKC)**

For each through train identified as traversing the segment during the Reporting Week, CPKC calculated the transit time using train movement details recorded in PTC data, specifically the time difference between Beaumont (train entry into or departure from UP's Houston or Beaumont Subdivisions) and Rosenberg (train entry into or departure from KCSR track at Rosenberg). CPKC reported the maximum transit time during the week and the calculated average transit time.

The PTC data on which these calculations are based is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC calculated transit times between Beaumont and Rosenberg using the events in KCSR Train Event data most comparable to the measures reflected in PTC data, specifically arrival/departure at Beaumont and departure/arrival at Kendleton (CP 905), the closest point to Rosenberg for which train events are reliably available. The calculated transit time was the difference between the latest time at the beginning of the segment and the earliest time at the end of the segment.

5.   Texas – Houston Terminal

***Transit Times (CPKC)**

Starting with the identification of CPKC through trains operating between Beaumont and Rosenberg (in Item 4 above), CPKC separated the trains by route (*i.e.*, the UP Beaumont Subdivision route and the UP Houston Subdivision route) using PTC on-board GPS data.

For the set of trains using each route, CPKC calculated the transit time for each train across the Houston terminal during the Reporting Week using train movement details recorded in PTC data, specifically the time difference between the north/east and south/west boundaries of the terminal. Those boundaries were: (a) for trains using the UP Beaumont Subdivision route (primarily north/eastbound), West Junction (UP Harrisburg Subdivision, MP 10.6) on the south/west and Dyersville (UP Beaumont Subdivision, MP 381.6) on the north/east; (b) for trains using the UP Houston Subdivision route (primarily southbound), West Junction (UP Harrisburg Subdivision, MP 10.6) on the south/west and Dawes (UP Houston Subdivision, MP 348.2) on the north/east. CPKC reported the calculated average transit times by route.

The elements of PTC data permitting the calculation of transit times across this segment are available only for the period since September 2022. For the remainder of the five-year lookback period (April 14, 2018 through September 2022), CPKC is unable to calculate comparable transit times, since neither CPKC Train Event nor any other data source available to CPKC covering the period prior to September 2022 provides a feasible and reliable means of determining passing times on UP owned and dispatched trackage at West Junction, Dyersville, or Dawes.

Dwell Time (CPKC)

For each through train identified as traversing the Houston Terminal during the Reporting Week, CPKC calculated dwell time using PTC on-board GPS data by measuring, for each train, the amount of time the train did not move for a period exceeding two minutes within the Houston terminal boundaries as defined above (*i.e.*, between West Junction and Dyersville or Dawes). CPKC reported the calculated average number of minutes of dwell per train.

The elements of PTC data permitting the calculation of dwell times on this segment are available only for the period since September 2022. For the remainder of the five-year lookback period (April 14, 2018 through September 2022), CPKC is unable to calculate comparable dwell times, since neither CPKC Train Event nor any other data source available to CPKC covering the period prior to January 2021 provides a feasible and reliable means of identifying train dwell times on UP owned and dispatched trackage in the Houston terminal.

6. Texas – Rosenberg to Laredo

Number of Trains per Day (CPKC)

CPKC used PTC on-board GPS data to identify the discrete CPKC (or KCS) through trains that reported both a departure or arrival at Rosenberg, TX and a departure or arrival at Laredo, TX. CPKC reported the calculated average number of trains per day that traversed the segment during the Reporting Week.

The PTC data used to identify trains across this segment is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC used KCSR Train Event data to identify the discrete KCSR trains that reported both a departure or arrival at Kendleton (approximately ten miles west of Rosenberg) and a departure or arrival at Laredo.

Train Lengths (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC determined the train's length using the figures recorded in PTC data. CPKC reported the length of the longest train during the Reporting Week. Where the recorded length of a particular train varied across the segment, CPKC used the highest figure. CPKC reported the number of trains with a length in excess of 10,000 feet. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train.

The PTC data used to determine train lengths is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC determined train lengths for the identified trains using KCSR Train Event data.

Transit Times (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC calculated the transit time using train movement details recorded in PTC data, specifically the time difference between Rosenberg (train entry into or departure from KCSR track at Rosenberg) and the east end of Laredo Yard. CPKC reported the maximum transit time during the week and the calculated average transit time.

The PTC data on which these calculations are based is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC calculated transit times between Rosenberg and Laredo using the events in KCSR Train Event data most comparable to the measures reflected in PTC data, specifically arrival/departure at Kendleton, the closest point to Rosenberg for which train events are reliably available, and departure/arrival at the east end of Laredo Yard. The calculated transit time was the difference between the latest time at the beginning of the segment and the earliest time at the end of the segment.

7. **Texas – Laredo Bridge**

Number of Trains per Day (CPKC and UP)

CPKC identified the number of KCSR, KCSM, and UP trains crossing the Laredo Bridge during the Reporting Week using data from AEI readers to which CPKC has access, specifically a KCSR AEI reader at the west end of Laredo Yard (AEI reader 714); a UP AEI reader at Milo (UP AEI reader 650), a point on UP's line north of the Laredo Bridge; a UP AEI reader at the north end of the Laredo Bridge (UP AEI reader 605); a KCSM AEI reader at the south end of the Bridge (AEI reader 861); and a KCSM reader at the north end of KCSM's Sanchez Yard (AEI reader 859).

Any train recorded as passing either of the readers at the Laredo Bridge was deemed to have crossed the Bridge. Trains were identified as CPKC (*i.e.*, KCSR/KCSM) and UP trains as follows: trains with an event at the west end of Laredo Yard or other KCSR stations east/north of Laredo were identified as CPKC trains; trains with an event at Milo or the absence of any KCSR event east/north of Laredo were deemed to be UP trains. (In other words, KCSM trains delivered to UP at the border were classified as UP trains).

CPKC reported, separately for CPKC and UP, the maximum number of trains in any day and the calculated average number of trains per day.

These data are being reported for the entire five-year lookback period, subject to the availability of data from UP-controlled AEI readers.

Train Lengths (CPKC and UP)

For each train identified as crossing the Laredo Bridge during the Reporting Week, CPKC determined the train's length using data derived from AEI readers. CPKC reported, by railroad, the length of the longest train during the Reporting Week. CPKC reported, by railroad, the number of trains with a length in excess of 10,000 feet. CPKC calculated percentile lengths, by railroad, ranking all of that railroad's trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reporting the length of that train.

These data are being reported for the entire five-year lookback period, subject to the availability of data from UP-controlled AEI readers.

Occupancy Time (CPKC and UP)

For each train identified as crossing the Laredo Bridge during the Reporting Week, CPKC determined the time the train occupied the Laredo Bridge using data from the AEI readers at the north and south ends of the Bridge (specifically the earliest time at the first AEI reader and the latest time at the second AEI reader). CPKC reported, by railroad, the calculated total number of occupancy minutes during the Reporting Week and the average number of minutes per train.

These data are being reported for the entire five-year lookback period, subject to the availability of data from UP-controlled AEI readers.

Minutes Held Prior to Bridge (CPKC and UP)

For CPKC through trains in the United States heading south toward the Laredo Bridge, CPKC identified those trains that operated between Robstown and Mexico during the Reporting Week and performed no scheduled work in the Laredo Terminal, and then, using available AEI reader data, measured the total time each train spent between arrival at the boundary of the Laredo Terminal and the north end of the Laredo Bridge (AEI reader 605). The terminal boundary for this purpose is the east end of CPKC's Laredo Yard (AEI reader 713).

For through trains in Mexico heading north towards the Laredo Bridge (and delivery to UP or KCSR), CPKC identified those trains that operated between Mexico and the United States during the Reporting Week and performed no scheduled work in the Laredo Terminal, and then, using available AEI reader data, measured the total time spent between arrival at the boundary of the Laredo Terminal and the south end of the Laredo Bridge (AEI reader 861). The terminal boundary for this purpose is the south/west end of KCSM's Sanchez Yard in Mexico (AEI reader 886).

For UP trains heading south toward the Laredo Bridge, CPKC identified those UP trains that operated between San Antonio, or UP's Port Laredo Intermodal Yard, and Mexico during the Reporting Week and performed no scheduled work in the Laredo Terminal, and then, using available AEI reader data, measured the total time spent between arrival at the boundary of the Laredo Terminal and the north end of the Laredo Bridge (UP AEI reader 605). The terminal boundary for this purpose is the UP-operated AEI reader at a point named "Milo" (AEI reader 650), between UP's Port Laredo Yard and UP's Import Yard just north of the Bridge.

CPKC reported the calculated average number of minutes per train during the Reporting Week, separately for UP and CPKC.

These AEI reader data are available for the entire five-year lookback period, subject to the availability of data from UP-controlled AEI readers.

8. **Metra/Chicago – MD-W Randall Road/Tower B-35 to Tower B-17**

Number of Trains per Day (CPKC)

CPKC used CPKC (or CP) Train Event data to identify the discrete CPKC/CP through trains that reported both a departure or arrival at or west of Randall Road and a departure or arrival at Tower B-17. All of those trains would also have passed Tower B-35. CPKC reported the calculated average number of trains per day that traversed the segment during the Reporting Week, separately for trains departing Randall Road (eastbound) and trains departing Tower B-17 (westbound).

These data are being reported for the entire five-year lookback period.

Train Lengths (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC determined the train's length using the figures recorded in CPKC/CP Train Event data. Where the recorded length of a particular train varied across the segment, CPKC used the highest figure. CPKC reported the length of the longest train during the Reporting Week. CPKC reported the number of trains with a length in excess of 10,000 feet. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train.

These data are being reported for the entire five-year lookback period.

Transit Times (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC calculated the transit time using train movement details recorded in PTC data, specifically the time difference between Tower 35 (CP Elgin Subdivision MP 35.1) and Randall Road (CP Elgin Subdivision MP 40.3). CPKC reported the maximum transit time during the week and the calculated average transit time.

The PTC data on which these calculations are based is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC is unable to calculate transit times between Randall Road/Tower B-35 and Tower B-17 for trains that did not record an event at the west end of the segment. For the subset of trains that did record such an event, CPKC calculated the transit time using train movement details recorded in CPKC/CP Train Event Data, specifically the time difference between recorded train events at Randall Road and Tower B-17. (There were no events recorded at Tower B-35). The calculated transit time was the difference between the latest time at the beginning of the segment and the earliest time at the end of the segment.

9. Metra/Chicago – MD-W Tower B-12 to Tower A-5

Number of Trains per Day (CPKC)

CPKC used CPKC (or CP) Train Event data to identify the discrete CPKC (or CP) through trains across this segment. Because that data does not generally record events at Tower B-12 or Tower A-5, CPKC identified trains as follows: (a) for eastbound trains, CPKC identified trains that departed Bensenville Yard eastbound, recorded an event at Cragin Junction (between Bensenville and Tower A-5), and arrived Sturtevant, WI or Milwaukee, WI (north of Tower A-5 on CPKC's C&M Subdivision); (b) for westbound trains, CPKC identified trains that departed Sturtevant or Milwaukee, recorded an event at Cragin Junction and arrived Bensenville Yard. All of the identified trains would have passed both Tower B-12 and Tower A-5, and this methodology would not exclude any CPKC through trains that operated between Tower B-12 and Tower A-5. CPKC reported the calculated average number of trains per day that traversed the segment during the Reporting Week, separately for trains "departing B-12" (*i.e.*, eastbound trains) and trains "departing Tower A-5" (*i.e.*, westbound trains).

These data are being reported for the entire five-year lookback period.

Train Lengths (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC determined the train's length using the figures recorded in CPKC/CP Train Event data. Where the recorded length of a particular train varied across the segment, CPKC used the highest figure. CPKC reported the length of the longest train during the Reporting Week. CPKC reported the number of trains with a length in excess of 10,000 feet. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train.

These data are being reported for the entire five-year lookback period.

Transit Times (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC calculated the transit time using train movement details recorded in PTC data, specifically the time difference between Tower B-12 (CP Elgin Subdivision MP 12.6) and Tower A-5 (CP Elgin Subdivision MP 5.4). CPKC reported the maximum transit time during the week and the calculated average transit time.

The PTC data on which these calculations are based is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC is unable to calculate transit times between Tower B-12 and Tower A-5 because neither CPKC/CP Train Event nor any other data source available to CPKC covering the period prior to January 2021 provides a feasible and reliable means of determining train passing times at those locations.

10.   Metra/Chicago – MD-N Tower A-20 to Tower A-5

Number of Trains per Day (CPKC)

CPKC used CPKC (or CP) Train Event data to identify the discrete CPKC/CP through trains across this segment. Because that data does not generally record events at Tower A-5 or Tower A-20, CPKC identified trains as follows: (a) for northbound trains, CPKC identified trains that recorded an event at Cragin Junction (east of Bensenville), and arrived Sturtevant, WI or Milwaukee, WI (north of Tower A-20 on CPKC's C&M Subdivision); (b) for westbound trains, CPKC identified trains that departed Sturtevant or Milwaukee and recorded an event at Cragin Junction. All of the identified trains would have passed both Tower A-20 and Tower A-5, and this methodology would not exclude any CPKC through trains that operated between Tower A-20 and Tower A-5. CPKC reported the calculated average number of trains per day that traversed the segment during the Reporting Week.

These data are being reported for the entire five-year lookback period.

__Train Lengths (CPKC)__

For each through train identified as traversing the segment during the Reporting Week, CPKC determined the train's length using the figures recorded in CPKC/CP Train Event data. Where the recorded length of a particular train varied across the segment, CPKC used the highest figure. CPKC reported the length of the longest train during the Reporting Week. CPKC reported the number of trains with a length in excess of 10,000 feet. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train.

These data are being reported for the entire five-year lookback period.

__Transit Times (CPKC)__

For each through train identified as traversing the segment during the Reporting Week, CPKC calculated the transit time using train movement details recorded in PTC data, specifically the time difference between Tower A-20 (C&M Subdivision MP 20.2) and Tower A-5 (C&M Subdivision MP 5.4). CPKC reported the maximum transit time during the week and the calculated average transit time.

The PTC data on which these calculations are based is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC is unable to calculate transit times between Tower A-20 and Tower A-5 because neither CPKC/CP Train Event nor any other data source available to CPKC covering the period prior to January 2021 provides a feasible and reliable means of determining train passing times at those locations.

11.   Metra/Chicago – MD-N Rondout to Tower A-20

Number of Trains per Day (CPKC)

CPKC used CPKC (or CP) Train Event data to identify the discrete CPKC/CP through trains across this segment. Because that data does not generally record events at Tower A-20 or Rondout, CPKC identified trains as follows: (1) for northbound trains, CPKC identified trains that (a) recorded an event at Cragin Junction (east of Bensenville) and arrived Sturtevant, WI or Milwaukee, WI (north of Rondout on CPKC's C&M Subdivision) or (b) departed Bensenville Yard westbound, recorded an event at AEI readers at West Bensenville (between Tower B-17 and Tower A-20), and arrived Sturtevant, WI or Milwaukee, WI; (2) for southbound trains, CPKC identified trains that (a) departed Sturtevant or Milwaukee and recorded an event at Cragin Junction or (b) departed Sturtevant or Milwaukee, recorded an event at AEI readers at West Bensenville, and arrived at the west end of Bensenville Yard. All of the identified trains would have passed both Rondout and Tower A-20, and this methodology would not exclude any CPKC through trains that operated between Rondout and Tower A-20. CPKC reported the calculated average number of trains per day that traversed the segment during the Reporting Week.

These data are being reported for the entire five-year lookback period.

Train Lengths (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC determined the train's length using the figures recorded in CPKC/CP Train Event data. Where the recorded length of a particular train varied across the segment, CPKC used the highest figure. CPKC reported the length of the longest train during the Reporting Week. CPKC reported the number of trains with a length in excess of 10,000 feet. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train.

These data are being reported for the entire five-year lookback period.

Transit Times (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC calculated the transit time using train movement details recorded in PTC data, specifically the time difference between Rondout (C&M Subdivision MP 32.4) and Tower A-20 (C&M Subdivision MP 20.2). CPKC reported the maximum transit time during the week and the calculated average transit time.

The PTC data on which these calculations are based is available only for the period since January 1, 2021. For the remainder of the five-year lookback period (April 14, 2018 through December 31, 2020), CPKC is unable to calculate transit times between Rondout and Tower A-20 because neither CPKC Train Event nor any other data source available to CPKC covering the period prior to January 2021 provides a feasible and reliable means of determining train passing times at those locations.

12.   **Metra/Chicago – CP Marquette Sub Sabula Junction to River Junction**

Number of Trains per Day (CPKC)

CPKC used CPKC (or CP) Train Event data to identify the discrete CPKC/CP through trains that reported both a departure or arrival at River Junction, MN (CP Marquette Subdivision, MP 159) and a departure or arrival at Sabula Junction, IA (CP Marquette Subdivision, MP 0). CPKC reported the calculated average number of trains per day that traversed the segment during the Reporting Week

These data are being reported for the entire five-year lookback period.

Train Lengths (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC determined the train's length using the figures recorded in CPKC/CP Train Event data. Where the recorded length of a particular train varied across the segment, CPKC used the highest figure. CPKC reported the length of the longest train during the Reporting Week. CPKC reported the number of trains with a length in excess of 10,000 feet. CPKC calculated percentile lengths by ranking all trains by length, identifying the train with the shortest length for which the specified percentage of trains (25%, 50%, or 75%) had shorter lengths, and then reported the length of that train.

These data are being reported for the entire five-year lookback period.

Transit Times (CPKC)

For each through train identified as traversing the segment during the Reporting Week, CPKC calculated the transit time using the minimum and maximum timestamps for each train movement record in CPKC (or CP) Train Event data (specifically, between CP Marquette Subdivision MP 0.0 and CP Marquette Subdivision MP 159). CPKC reported the calculated average transit time. The calculated transit time was the difference between the latest time at the beginning of the segment and the earliest time at the end of the segment.

These data are being reported for the entire five-year lookback period.

D.   Status of Capital Projects on CP Marquette Subdivision

This information is provided in Table 4 below.

TABLE 4
STATUS OF MARQUETTE SUBDIVISION CAPITAL PROJECTS AS OF OCTOBER 15, 2023

LOCATION	PROJECT	STATUS
MP 24 to MP100 (Marquette)	72 Miles of CTC Signaling	For segment between MP 46 and MP 72, construction in progress, for target in-service date of October 2023. For segments between MP 24 and MP 46 and between MP 72 and MP 100 (Marquette), design in progress, with construction planned to begin in 2024, for target in-service date of October 2024.
Brownsville (MP 155)	New 10,200-foot siding	Design has been completed; construction planned to begin in 2026, but could be accelerated if volumes increase faster than anticipated.
Turkey River (MP71)	New 12,200-foot siding	Design in progress; construction planned to begin in 2024, for target in-service date in Q2 2025.
Bellevue (MP24)	New 10,200-foot siding	Construction in progress, with competition anticipated by the end of 2023; track and signal work planned for Q1-Q2 2024, for target in-service date in Q2 2024.

Respectfully submitted,

David L. Meyer

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Attorneys for CPKC

October 15, 2023

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing CPKC's October 15, 2023 Data

Submission to be served electronically or by first class mail, postage pre-paid, on all parties of

record in this proceeding.

/s/ *David L. Meyer*
David L. Meyer

October 15, 2023

APPENDIX A
FSACs AND RULE 260 JUNCTIONS FOR GATEWAY DATA REPORTING

GATEWAY	INCLUDED RULE 260 JUNCTIONS	INCLUDED FSACs
Beaumont	BMONT	00767
Chicago	BENSI, BENSV, BLUIS, CALMT, CHGO, CHGRK, CHTS, CLEAR, GIBSN, ITSCA, MARKH, NORPA, PROVI, SCHPK, SPLDG, YARDC,	04541, 04540, 04520, 00295, 04544, 00508, 00296, 00498, 00293, 04548, 00511, 04522, 04517, 00454, 04555, 00299
Dallas	DALAS	09223
East St. Louis	ESTL, MADIS, STLOU, WDRVR	22810, 22760, 92340, 12525
Eastport	EPORT, KINGS	09089, 09088
Jackson	JACKN	01222
Kansas City	AIRJT, KANCY, KCITY	CP: 04690, 04694, 04700 KCSR: 00001, 00005, 00006
Laredo	LARED	02001
Meridian	MERID	01318
Minneapolis/St. Paul	BAYPO, CARJM, FRGTN, HUMMP, MINTR, MPLS, NOFLD, NSBIT, NTOWN, PTCAR, ROSPT, RSMNT, SSTPA, STPAU, STPPK, STPWA, VALPK	00649, 04862, 00389, 04871, 00656, 04866, 00621, 00628, 00695, 00626, 00677, 00390, 00674, 04850, 04846, 04859, 00715
New Orleans	NEWOR	03308
Robstown	CORPU, ROBST	02161, 02145
Shreveport	SHRPT	00554

APPENDIX B

EXPLANATIONS FOR METHODOLOGIES USED BY CP AND KCS TO CALCULATE METRICS REPORTED IN EX PARTE NO. 724 AND EX PARTE NO. 770

Request	Definition of Term	Data Source	Formula of Calculation

1. **System-average train speed by the following train types for the reporting week:**
  a. **Intermodal**
  b. **Grain unit**
  c. **Coal unit**
  d. **Automotive unit**
  e. **Crude oil unit**
  f. **Ethanol unit**
  g. **Manifest**
  h. **System**
	The average speed measures the line-haul movement from origin to destination excluding terminal dwell hours calculated by dividing the total train miles traveled by the total hours operated. This calculation does not include the travel time or the distance traveled by: i) trains used in or around CP's yards; ii) passenger trains; and iii) trains used for repairing track.	Existing train speed data sources used for both internal and external reporting from CP's operating system through the data warehouse via dashboard / custom queries	Sum of total train miles / sum of total train hours
			
			• Train hours does not include station time
			• Trains are grouped based on train number or symbol with the following definitions:
			  - Intermodal = All 100 series ex. Autos
			  - Grain unit = All 300 series
			  - Coal unit = All 800 series
			  - Automotive unit = 106/137
			  - Crude unit = selected 500 series
			  - Ethanol unit = selected 500 series
			  - Manifest = all 200 and 400 series
			  - System = all symbolled trains

2. **Weekly average terminal dwell time, measured in hours, excluding cars on run-through trains (i.e. cars that arrive at, and depart from, a terminal on the same through train) for that carrier's system and its 10 largest terminals in terms of railcar capacity.**	The average time a freight car resides within terminal boundaries of our 10 largest terminals (yards) in the US, expressed in hours. The measurement begins with a customer release, received interchange, or train arrival event and ends with a customer placement (actual or constructive), delivered or offered in interchange, or train departure event. This will exclude stored, bad ordered, and maintenance of way cars.	Existing yard and terminal dwell data sources used for both internal and external reporting from CP's operating system through the data warehouse via dashboard / custom queries	Sum of total dwell hours / sum of total cars handled Top 10 includes the following: Albany, Bensenville, Glenwood, Harvey, La Crosse, Mason City, Milwaukee, Nahant, Saratoga Springs, St Paul System calculation includes all yards for which data is available in the US (16 yards). Includes the ten listed above plus: Buffalo, Enderlin, Minneapolis Humboldt, Minot, Portage, Saratoga Springs, Thief River Falls

Request	Definition of Term	Data Source	Formula of Calculation
3. **Total cars on line by the following car types for the reporting week:** a. **Box** b. **Covered hopper** c. **Gondola** d. **Intermodal** e. **Multilevel (Automotive)** f. **Open hopper** g. **Tank** h. **Other** i. **Total**	Average total cars online CP's US network for the seven (7) daily "snapshots" from the week. Excludes Locomotives, Containers and miscellaneous cars on company service.	Cars On-Line sourced from CP's operating system through the data warehouse via dashboard / custom queries	Sum of (Monday Snapshot Count+ Tuesday Snapshot Count……. + Friday Snapshot Count) / divided by # of days in the week (7) Cars are grouped into Car Types using their AAR Car Codes from UMLER. Snapshots taken between 00:01 – 02:00 every day. Rounded to the closest whole number.
4. **Weekly average dwell time at origin for unit train shipments sorted by grain, coal, automotive, crude oil, ethanol, and all other unit trains. (Dwell time refers to the time period from billing and release of a unit train at origin until actual movement by the carrier.)**	Time (in hours) between the release of a car by a customer (empty or loaded) to the first movement of the car by CP. Includes only cars that travelled on designated unit trains. Excludes cars with offline origins.	Train movement management tool "Nexus" with data processed in business objects.	Average time between Origin Release and Origin Departure timestamps

Request	Definition of Term	Data Source	Formula of Calculation
5. **The weekly daily average number of trains held short of destination or scheduled interchange for longer than six hours sorted by train type (intermodal, grain unit, coal unit, automotive unit, crude oil unit, ethanol unit, other unit, and manifest) and by cause (crew, locomotive power, or other).**	The weekly daily average of trains delayed by 6 or more hours in a single location. When more than one cause is present at the location, the main cause will be established based on the delay cause with the greatest amount of time at that location.	Train movement management tool "Nexus" with data processed in excel	If sum of delay hours grouped by station >= 6 include, else exclude • Trains are grouped based on train number or symbol with the following definitions: - Intermodal = All 100 series ex. Autos - Grain unit = All 300 series - Coal unit = All 800 series - Automotive unit = 106/137 - Crude unit = selected 500 series - Ethanol unit = selected 500 series - Manifest = all 200 and 400 series - System = all symbolled trains
6. **The weekly daily average of loaded and empty cars, stated separately, in revenue service that have not moved in more than 48 hours, sorted by the following classifications (intermodal, grain, coal, crude oil, automotive, ethanol, or all other). For purposes of this item, "moved" refers to making a train movement (departure) or a spot or pull from a customer location.**	Average total cars online CP's US network dwelling over 48 hours for the seven (7) daily "snapshots" from the week. Dwelling defined as the time (in hours) from the last movement event (i.e. Departure/Arrival or Spot/Pull from Customer). Excludes Locomotives, Containers and miscellaneous cars on company service. Excludes cars in Storage, in Placed Constructive status, in bad order status or Placed on a Customer's track.	Cars dwelling sourced from CP's operating system through the data warehouse via dashboard / custom queries	Sum of (Monday Snapshot Count+ Tuesday Snapshot Count……. + Friday Snapshot Count) / divided by # of days in the week (7) Grouped by: - > 48hours Snapshots taken between 00:01 – 02:00 every day. Rounded to the closest whole number.

Request	Definition of Term	Data Source	Formula of Calculation
7. **The weekly total number of grain cars loaded and billed, reported by State, aggregated for the following Standard Transportation Commodity Codes (STCCs): 01131 (barley), 01132 (corn), 01133 (oats), 01135 (rye), 01136 (sorghum grains), 01137 (wheat), 01139 (grain, not elsewhere classified), 01144 (soybeans), 01341 (beans, dry), 01342 (peas, dry), and 01343 (cowpeas, lentils, or lupines). Total grain cars loaded and billed" includes cars in shuttle service; dedicated train service; reservation, lottery, open and other ordering systems; and, private cars. Additionally, please separately report the total cars loaded and billed in shuttle service (or dedicated train service) versus total cars loaded and billed in all other ordering systems, including private cars.**	Total number of Grain cars billed on CP's US network during the week with a commodity code of: 010, 011, 020, 021, 022, 023, 024, 025, 026, 072, 073, 074, 075, 076	Billings sourced from waybill records with custom queries / excel	Sum of cars billed. Shuttle/Dedicated >90 unique car numbers billed on the same day from the same Origin to the same Destination Other All other

Request	Definition of Term	Data Source	Formula of Calculation
8. **For the aggregated STCCs in Item 7, report by State the following:** a. **The running total number of orders placed;** b. **Running total of orders filled;** c. **The number of orders unfilled, broken into 1-10 days, and 11+ days past due.**	a. <u>Running total orders</u>: Number of orders placed in reporting week b. <u>Running total orders filled</u>: Number of orders filled in reporting week c. <u>Number of orders unfilled</u>: Number of car orders with an empty want date between 1-10 days old and 11+ days old	Sourced from order tracking data maintained by the bulk planning team.	a. Count of car orders placed in the US in reporting week b. Count of car orders filled in the US in the reporting week c. Count of car orders with an empty want date, measured back in time from the week end date.
9. **Average daily coal unit train loadings versus plan for the reporting week by coal production region.**	CP does not have any on line coal loading facilities in the US.	N/A	Not applicable
10. **Plan versus performance for grain shuttle (or dedicated grain train) round trips, by region, updated to reflect the previous four weeks.**	The estimated average trips per month completed by grain cars traveling on specific designated grain trains (dedicated customer trains) for the last 4 weeks. A Trip is defined as a full cycle from Placed Empty at customer to Placed Empty at customer again.	Sourced from custom queries / excel	(365 / 12) divided by Average(Train Placed Empty Timestamp minus Previous Train Placed Empty Timestamp) Captures cars where a Placed Empty at customer event occurred within the given week.

Car Loadings (Item 11)

Request	Definition of Term	Source	Formula of Calculation
1. **Weekly Originated and Received Carloads broken down by commodity group**	Total number of carloads originated and received for the specified week, broken down by the 22 commodity groups.	Billings sourced from waybill records with custom queries / excel	Sum of carloads in the given week, defined by Sunday to Saturday, snapshot taken on Monday.
2. **Weekly Originated and Received Carloads of Fertilizer**	Total number of carloads originated and received for the specified week, broken down by the specified Fertilizer STCC codes. (2871236, 2871235, 2871238, 2819454, 2812534, 2818426, 2819815, 2818170, 2871315, 2818142, 2818146, 2871244, 2819173, 2871451, and 2871313)	Billings sourced from waybill records with custom queries / excel	Sum of carloads in the given week, defined by Sunday to Saturday, snapshot taken on Monday. Qualified by the specified STCC codes for Fertilizer as requested.

Chicago Specific Metrics

Request	Definition of Term	Source	Formula of Calculation
1. **Average daily car counts in the key Chicago terminal yards of Barr, Bensenville, Blue Island, Calumet, Cicero, Clearing, Corwith, Gibson, Kirk, Markham and Proviso for the reporting week**	Average total cars online CP's US network for the seven (7) daily "snapshots" from the week at the specific Chicago area FSAC's. FSAC's: 04540; 04541; 04538; 04543; 04520; 00295; 00498; 00511; 04517 Excludes Locomotives, Containers and miscellaneous cars on company service.	Cars dwelling sourced from CP's operating system through the data warehouse via dashboard / custom queries	Sum of (Monday Snapshot Count+ Tuesday Snapshot Count……. + Friday Snapshot Count) / divided by # of days in the week (7) Cars are grouped into Car Types using their AAR Car Codes from UMLER. Snapshots taken between 00:01 – 02:00 every day. Rounded to the closest whole number.
2. **Average daily number of trains held for delivery to Chicago sorted by receiving carrier for the reporting week.**	The average daily number of trains destined to Chicago which were delayed by 6 or more hours in a single location, due to foreign railway issue(s), grouped by receiving carrier.	Cars dwelling sourced from CP's operating system through the data warehouse via dashboard / custom queries	Include trains where sum of delay hours grouped by station >= 6 AND train destination station is in the Chicago area AND delay reason is in group: F01 Foreign - Crew Availability F04 Foreign - Interchange Issue F06 Foreign - RR Capacity

Request	Definition of Term	Data Source	Formula of Calculation
1. **System-average train speed by the following train types for the reporting week:** a. **Intermodal** b. **Grain unit** c. **Coal unit** d. **Automotive unit** e. **Crude oil unit** f. **Ethanol unit** g. **Manifest** h. **System**	Train speed measures the line-haul movement from origin to destination between terminals; terminal time is excluded. Local, passenger, maintenance of way trains and yard jobs are excluded from train speed measurements. Delay hours linked to customers, foreign railroads/trackage rights, act of god, and maintenance of way are removed from the travel time. Terminal dwell is excluded if properly accounted for with train events.	KCS' MCS operating system train events written via AEI readers, OS points or manual entry	KCS calculates speed as the average train speed in miles per hour weighted by miles. Sum of total train miles / sum of total train hours. o Intermodal unit – I Train type o Grain unit – G train type o Coal unit – C train type o Automotive unit – A/V train type o Crude oil unit (including DRUbit™[1], which trains carry the "O" symbol and will be specially reviewed and segregated from other "O" symbol trains for this reporting purpose) – defined by train symbols "O-JAAR";"O-ARJA";"O-566006";"O-566007";"O-567007";"O-567008";"O-568006";"O-568007";"O-569007";"O-572007";"O-572008";"O-573007";"O-573008";"O-573009";"O-576003";"O-577003";"O-577004";"O-579002";"Q-566006";"Q-566007";"Q-567007";"Q-567008";"Q-568006";"Q-568007";"Q-569007";"Q-572007";"Q-572008";"Q-573007";"Q-573008";"Q-573009";"Q-576003";"Q-577003";"Q-577004";"Q-579002" o Ethanol unit (KCS currently does not move unit ethanol trains and has no assigned symbol for same) o Other unit (except DRUbit™) - Q train type and all other O symbols o Manifest – M train type

[1]   DRUbit™ is a proprietary heavy Canadian crude oil or bitumen that ships by rail and does not meet any of the defined categories of hazardous materials by U.S. DOT Hazardous Materials regulations and Canada's Transport of Dangerous Goods regulations.

Request	Definition of Term	Data Source	Formula of Calculation
2. **Weekly average terminal dwell time, measured in hours, excluding cars on run-through trains (i.e. cars that arrive at, and depart from, a terminal on the same through train) for that carrier's system and its 10 largest terminals in terms of railcar capacity.**	A car level metric that measures the average time a car resides at the specified terminal location expressed in hours. The measurement begins with a customer release, received interchange, or arrival event and ends with a customer placement (actual or constructive), delivered or offered in interchange, or departure event. Cars that move through a terminal on a run-through train are excluded, as are stored, bad ordered, and maintenance of way cars. All hold time is excluded. The weekly metric is calculated by dividing the total number of hours cars spent in terminals by the total count of car dwell events for cars that meet the inclusion criteria.	Existing yard and terminal dwell data sources used for both internal and external reporting from KCS' MCS operating system through the data warehouse via dashboard / custom queries	KCS terminal dwell is the sum of total dwell hours / Count of cars recording dwell hours Top 10 includes the following: Shreveport Yard, Kansas City, Laredo, Jackson, Artesia, Baton Rouge, Meridian, Latanier, Beaumont, and Wylie. System calculations includes all US KCS Railyards.

3. **Total cars on line by the following car types for the reporting week:**
  i. **Box**
  j. **Covered hopper**
  k. **Gondola**
  l. **Intermodal**
  m. **Multilevel (Automotive)**
  n. **Open hopper**
  o. **Tank**
  p. **Other**
  q. **Total**
	The total number of cars online, including cars at a customer's location. The weekly metric is calculated by taking a simple average of each day's total cars online for each respective category.	Cars On-Line sourced from KCS' MCS operating system through the data warehouse via dashboard / custom queries	Sum of (Monday Snapshot Count+ Tuesday Snapshot Count……. + Friday Snapshot Count) / divided by # of days in the week (7)
			
			Cars are grouped into Car Types using their AAR Car Codes from UMLER.
			
			Snapshots taken between 00:01 – 02:00 every day.
			
			Rounded to the closest whole number.

Request	Definition of Term	Data Source	Formula of Calculation
4. **Weekly average dwell time at origin for unit train shipments sorted by grain, coal, automotive, crude oil, ethanol, and all other unit trains. (Dwell time refers to the time period from billing and release of a unit train at origin until actual movement by the carrier.)**	Time (in hours) between the release of a car by a customer (empty or loaded) to the first movement of the car by CP. Includes only cars that travelled on designated unit trains. Excludes cars with offline origins.	This data is sourced from KCS' MCS operating system with data processed in business objects.	Average time between Origin Release and Origin Departure timestamps.

Request	Definition of Term	Data Source	Formula of Calculation

5. **KCS will manually gather a current daily "snapshot" of trains held as of approximately 0800 hours from each division and combine field reports into a system-wide number with reasons held.**	KCS will manually gather a current daily "snapshot" of trains held as of approximately 0800 hours from each division and combine field reports into a system-wide number with reasons held.	This data is sourced from KCS' MCS operating system with data processed in business objects.	If sum of delay hours grouped by station >= 6 include, else exclude
			
			• Trains are grouped based on train number or symbol with the following definitions:
			  - Intermodal unit – I Train type
			  - Grain unit – G train type
			  - Coal unit – C train type
			  - Automotive unit – A/V train type
			  - Crude oil unit (including DRUbit™[1], which trains carry the "O" symbol and will be specially reviewed and segregated from other "O" symbol trains for this reporting purpose) – defined by train symbols "O-JAAR";"O-ARJA";"O-566006";"O-566007";"O-567007";"O-567008";"O-568006";"O-568007";"O-569007";"O-572007";"O-572008";"O-573007";"O-573008";"O-573009";"O-576003";"O-577003";"O-577004";"O-579002";"Q-566006";"Q-566007";"Q-567007";"Q-567008";"Q-568006";"Q-568007";"Q-569007";"Q-572007";"Q-572008";"Q-573007";"Q-573008";"Q-573009";"Q-576003";"Q-577003";"Q-577004";"Q-579002"
			  - Ethanol unit (KCS currently does not move unit ethanol trains and has no assigned symbol for same)
			  - Other unit (except DRUbit™) - Q train type and all other O symbols
			  - Manifest – M train type

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[1] DRUbit™ is a proprietary heavy Canadian crude oil or bitumen that ships by rail and does not meet any of the defined categories of hazardous materials by U.S. DOT Hazardous Materials regulations and Canada's Transport of Dangerous Goods regulations.

Request	Definition of Term	Data Source	Formula of Calculation
6. **The weekly daily average of loaded and empty cars, stated separately, in revenue service that have not moved in more than 48 hours, sorted by the following classifications (intermodal, grain, coal, crude oil, automotive, ethanol, or all other). For purposes of this item, "moved" refers to making a train movement (departure) or a spot or pull from a customer location.**	KCS reports loaded cars and empty cars in revenue service that dwell for 48 hours or greater. Cars will be reported by the requested classification based on STCC.	Cars dwelling sourced from KCS' MCS operating system through the data warehouse via dashboard / custom queries	Sum of (Monday Snapshot Count+ Tuesday Snapshot Count……. + Friday Snapshot Count) / divided by # of days in the week (7) Grouped by: - > 48hours Snapshots taken between 00:01 – 02:00 every day. Rounded to the closest whole number.

Request	Definition of Term	Data Source	Formula of Calculation
7. **The weekly total number of grain cars loaded and billed, reported by State, aggregated for the following Standard Transportation Commodity Codes (STCCs): 01131 (barley), 01132 (corn), 01133 (oats), 01135 (rye), 01136 (sorghum grains), 01137 (wheat), 01139 (grain, not elsewhere classified), 01144 (soybeans), 01341 (beans, dry), 01342 (peas, dry), and 01343 (cowpeas, lentils, or lupines). Total grain cars loaded and billed" includes cars in shuttle service; dedicated train service; reservation, lottery, open and other ordering systems; and, private cars. Additionally, please separately report the total cars loaded and billed in shuttle service (or dedicated train service) versus total cars loaded and billed in all other ordering systems, including private cars.**	KCS reports 1 system level number of all the requested information for shipments with the required STCCs.	Billings sourced from waybill records with custom queries / excel through KCS' Grain Department (Daniel Schueth)	Sum of cars billed. Shuttle/Dedicated >90 unique car numbers billed on the same day from the same Origin to the same Destination Other All other

Request	Definition of Term	Data Source	Formula of Calculation
8. **For the aggregated STCCs in Item 7, report by State the following:** a. **The running total number of orders placed;** b. **Running total of orders filled;** c. **The number of orders unfilled, broken into 1-10 days, and 11+ days past due.**	KCS will provide all requested data from our Equipment Control System.	Sourced from order tracking data maintained by the bulk planning team.	d. Count of car orders placed in the US in reporting week e. Count of car orders filled in the US in the reporting week f. Count of car orders with an empty want date, measured back in time from the week end date.
9. **Average daily coal unit train loadings versus plan for the reporting week by coal production region.**	KCS has no coal originations	N/A	Not applicable
10. **Average Grain Shuttle Turns per Month By Region And System versus Planned Turns Per Month**	KCS reports the metric at a system level. The average turns per month comes from a manually maintained document of grain shuttles.	Sourced from custom queries / excel	(365 / 12) divided by Average(Train Placed Empty Timestamp minus Previous Train Placed Empty Timestamp) Captures cars where a Placed Empty at customer event occurred within the given week.

Car Loadings (Item 11)

Request	Definition of Term	Source	Formula of Calculation
1. **Weekly Originated and Received Carloads broken down by commodity group**	Total number of carloads originated and received for the specified week, broken down by the 22 commodity groups.	Billings sourced from waybill records with custom queries / excel	Sum of carloads in the given week, defined by Sunday to Saturday, snapshot taken on Monday.
2. **Weekly Originated and Received Carloads of Fertilizer**	Total number of carloads originated and received for the specified week, broken down by the specified Fertilizer STCC codes. (2871236, 2871235, 2871238, 2819454, 2812534, 2818426, 2819815, 2818170, 2871315, 2818142, 2818146, 2871244, 2819173, 2871451, and 2871313)	Billings sourced from waybill records with custom queries / excel	Sum of carloads in the given week, defined by Sunday to Saturday, snapshot taken on Monday. Qualified by the specified STCC codes for Fertilizer as requested.

Request	Definition of Term	Source	Formula of Calculation
1. **The weekly average terminal dwell times, measured in hours, for the carrier's 11th through 20th largest terminals (to augment the system-wide data and the data currently reported for the ten largest terminals under 49 C.F.R. § 1250.2(a)(5)).**	The average time a freight car resides within terminal boundaries of our 11th to 20th largest terminals (yards) in the US, expressed in hours. The measurement begins with a customer release, received interchange, or train arrival event and ends with a customer placement (actual or constructive), delivered or offered in interchange, or train departure event. This will exclude stored, bad ordered, and maintenance of way cars.	Existing yard and terminal dwell data sources used for both internal and external reporting from CP's operating system through the data warehouse via dashboard / custom queries	Sum of total dwell hours / sum of total cars handled Top 10 includes the following: Albany, Bensenville, Glenwood, Harvey, La Crosse, Mason City, Milwaukee, Nahant, Saratoga Springs, St Paul System calculation includes all yards for which data is available in the US (16 yards). Includes the ten listed above plus: Buffalo, Enderlin, Minneapolis Humboldt, Minot, Portage, Saratoga Springs, and Thief River Falls. The performance period is Saturday to Friday for each respective week.
2. **Train Starts: The weekly average number of train starts per day (to augment the weekly average number of trains held per day data currently reported under 49 C.F.R. § 1250.2(a)(5)), sorted by train type (intermodal, grain unit, coal unit, automotive unit, crude oil unit, ethanol unit, other unit, and manifest).**	SOO measures the number of daily unit trains started at all US origins on its network, sorted by train type. The reported metric is calculated by taking the aggregate sum of all new train starts for the week and dividing by 7. Note that SOO predominantly operates its automotive trains in manifest service rather than in unit trains. However, all automotive trains are reported in this metric.	Sourced from CP's operating system through the data warehouse via dashboard / custom queries	Count of all train starts (Monday Count+ Tuesday Snapshot Count……. + Friday Snapshot Count) / divided by # of days in the week (7) The performance period is Saturday to Friday for each respective week.

Request	Definition of Term	Source	Formula of Calculation
3. **Car Miles and Car Fleet Status: The following information, reported separately for privately-owned, TTX-owned, and railroad-owned cars:** (i) **the weekly average number of cars per day in storage;** (ii) **the weekly average number of cars per day in service with no mileage;** (iii) **the weekly average number of cars per day in service with mileage;** (iv) **the weekly average number of car miles per day; and** (v) **the aggregate number of car miles per week.**	i) Cars in Storage – measures the daily number of cars in storage on SOO owned and operated track, sorted by ownership. ii) Cars with no mileage – SOO measures the daily number of cars recording no car-miles, sorted by ownership. This measure includes all cars on SOO owned and operated track. iii) Cars with mileage – SOO measures the daily number of cars recording car-miles, sorted by ownership. This measure includes all cars on SOO owned and operated track. iv) Average Car miles per day – SOO measures the total daily car miles produced by cars on SOO owned and operated track, sorted by ownership. v) Aggregate Car miles per week – SOO measures the total daily car miles produced by cars on SOO owned and operated track, sorted by ownership.	Cars and miles dwelling sourced from CP's operating system through the data warehouse via dashboard / custom queries	Simple average of daily snapshot of each group For Private cars in storage SOO uses the following logic: if a private car is dwelling for more than 168 hours, then it's considered as storage as SOO has no visibility for private cars being held for storage at a customer. The performance period is Saturday to Friday for each respective week.
4. **Re-crews: With respect to re-crews, for each operating division and for the system: (i) the weekly number of unplanned re-crews due to compliance with federal hours of service regulations, and (ii) the re-crew rate measured as a percentage of total crew starts.**	SOO reports the number of re-crews for any reason, sorted by operating division. The vast majority of re-crews are required for compliance with federal hours of service regulations. However, this metric will include a minority of re-crews that were required due to service interruptions, safety incident, or similar, which then required the removal of the crew from that train. This metric may also include re-crew events that were done at the discretion of the company in order to manage over time expenses.	Re-crews sourced from CP's operating system through the data warehouse via dashboard / custom queries	The re-crew percentage is calculated by dividing the number of re-crews by the total number of crew starts, for each operating division. The performance period is Saturday to Friday for each respective week.

Request	Definition of Term	Source	Formula of Calculation
5. **First Mile / Last Mile: For each operating division and for the system, the percentage of scheduled spots and pulls that were fulfilled. (This is sometimes referred to in the industry as "Industry Spot and Pull.")**	CP/SOO measures performance of the number of cars spotted and pulled against the Local Operating Plan (LOP). The LOP includes customer requests for spots and pulls made to CP/SOO prior to the agreed upon cut-off time. The percentage for each operating division represents the total number of spots/pulls fulfilled divided by total number of spots/pulls requested by cut-off time. The system average is a simple average of operating divisions reported.	Compiled by Network Service Center daily for CP and summarized in excel.	For each operating division, total number of spots/pulls fulfilled divided by the total number of spots/pulls requested by cut-off time. The system average is a simple unweighted average of operating divisions reported. The performance period is Saturday to Friday for each respective week.
6. **Train cancellations: For each operating division and for the system, the weekly average number of local trains cancelled per day, and the aggregate number of local trains cancelled per week, broken down by cause (crew, locomotive power, or other).**	SOO measures the number of local trains which were cancelled each day. Local trains are responsible for first mile/ last mile movements between a serving yard and customer facility. SOO reports the daily average and the aggregate number of trains cancelled each week, sorted by the reason for cancellation (crew, locomotive and other). SOO reports the daily average and the aggregate number of trains cancelled each week, sorted by the reason for cancellation (crew, locomotive and other).	Train cancellations from CP's operating system through the data warehouse via dashboard / custom queries	Count of trains cancelled each day, summed for the week and divided by 7 for the daily average. The performance period is Saturday to Friday for each respective week.
7. **Cars and Trains Placed Within 24 hrs of Original Arrival Estimate** i. **For rail cars moving in manifest service, the percentage of cars constructively or actually placed at destination within 24 hours of the original estimated time of arrival.**	i) SOO measures the number of manifest traffic cars actually or constructively placed at destination, or offered at interchange, within 24 hours of the original estimated time of arrival as defined by either 1) the customer service switch window +24 hours in the case of locally delivered shipments, or 2) the scheduled interchange time +24 hours in the case of interline movements. The original estimate is according to the Trip Plan created for each carload prior to its first movement away from the customer's facility at origin. Details of the Trip Plan are made available to the customer for tracking and planning purposes.	Sourced from CP's operating system through the data warehouse via dashboard / custom queries	Count of shipments measured as on time within 24 hours divided by total count of shipments for the period. The performance period is Saturday to Friday for each respective week.

Request	Definition of Term	Source	Formula of Calculation
ii. **For the following types of unit trains (grain unit, coal unit, automotive unit, crude oil unit, and ethanol unit), the percentage of trains constructively or actually placed at destination within 24 hours of the original estimated time of arrival.**	ii) SOO measures the number of unit trains, sorted by the required train types which arrive at the destination within 24 hours of the original estimated time of arrival. The percentage of unit trains arriving at the destination less than 24hrs late to the original ETA, as a proportion of total unit trains, is reported for the performance period. Note that SOO normally operates it US Automotive traffic in manifest service, as opposed to unit train service. Therefore this metric reports manifest automotive traffic in addition to unit train traffic in order to provide completeness of the data.	Sourced from CP's operating system through the data warehouse via dashboard / custom queries	Count of trains arriving less than 24 hours late divided by the total count of trains arriving in the week. The performance period is Saturday to Friday for each respective week.
iii. **For intermodal traffic, the percentage of trains that arrive at destination within 24 hours of the original estimated time of arrival. For movements involving more than one rail carrier in each of the specified categories, the destination for the upstream carrier shall be treated as the interchange location with the subsequent railroad.**	iii) SOO measures the number of intermodal trains placed at destination within 24 hours of the original estimate. The original estimate is according to the train schedule for each train. The percentage of intermodal trains arriving at the destination less than 24hrs late to the original scheduled arrival time, as a proportion of total intermodal trains, is reported for the performance period.	Sourced from CP's operating system through the data warehouse via dashboard / custom queries	Count of trains arriving less than 24 hours late divided by the total count of trains arriving in the week. The performance period is Saturday to Friday for each respective week.

Request	Definition of Term	Source	Formula of Calculation
1. **The weekly average terminal dwell times, measured in hours, for the carrier's 11th through 20th largest terminals (to augment the system-wide data and the data currently reported for the ten largest terminals under 49 C.F.R. § 1250.2(a)(5)).**	The average time a freight car resides within terminal boundaries of our 11th to 20th largest terminals (yards) in the US, expressed in hours. The measurement begins with a customer release, received interchange, or train arrival event and ends with a customer placement (actual or constructive), delivered or offered in interchange, or train departure event. This will exclude stored, bad ordered, and maintenance of way cars.	Existing yard and terminal dwell data sources used for both internal and external reporting from KCS' MCS operating system through the data warehouse via dashboard / custom queries	The current list of the top 20 KCS yards in terms of cars processed, in order from most to fewest cars processed, is as follows: (1) Shreveport; (2) Kansas City; (3) Laredo Yard; (4) Jackson; (5) Artesia; (6) Baton Rouge; (7) Meridian; (8) Latanier; (9) Beaumont; (10) Wylie; (11) New Orleans; (12) Mossville; (13) Port Arthur; (14) Lake Charles; (15) Heavener; (16) East St Louis; (17) Gulfport; (18) Monroe; (19) Corpus Christi; and (20) Bossier City The performance period is Saturday to Friday for each respective week.

Request	Definition of Term	Source	Formula of Calculation
2. **Train Starts: The weekly average number of train starts per day (to augment the weekly average number of trains held per day data currently reported under 49 C.F.R. § 1250.2(a)(5)), sorted by train type (intermodal, grain unit, coal unit, automotive unit, crude oil unit, ethanol unit, other unit, and manifest).**	KCS maintains data from which this can be derived. A "train start" is determined by the train symbol for a linehaul train. Linehaul trains are trains that are not local trains, as defined in respect to data Item 6 below. A train symbol indicates the train type (e.g., intermodal) and origin and destination cities. A train symbol has only one start in the U.S., even if it takes more than one day for the train to reach its destination. Train types will be identified based on the following train symbols: - Intermodal unit – I Train type - Grain unit – G train type - Coal unit – C train type - Automotive unit – A/V train type - Crude oil unit (including DRUbit™[9], which trains carry the "O" symbol and will be specially reviewed and segregated from other "O" symbol trains for this reporting purpose) – defined by train symbols "O-JAAR";"O-ARJA";"O-566006";"O-566007";"O-567007";"O-567008";"O-568006";"O-568007";"O-569007";"O-572007";"O-572008";"O-573007";"O-573008";"O-573009";"O-576003";"O-577003";"O-577004";"O-579002";"Q-566006";"Q-566007";"Q-567007";"Q-567008";"Q-568006";"Q-568007";"Q-569007";"Q-572007";"Q-572008";"Q-573007";"Q-573008";"Q-573009";"Q-576003";"Q-577003";"Q-577004";"Q-579002" - Ethanol unit (KCS currently does not move unit ethanol trains and has no assigned symbol for same) - Other unit (except DRUbit™) - Q train type and all other O symbols - Manifest – M train type	Sourced from KCS' MCS operating system through the data warehouse via dashboard / custom queries	Count of all train starts (Monday Count+ Tuesday Snapshot Count……. + Friday Snapshot Count) / divided by # of days in the week (7) The performance period is Saturday to Friday for each respective week.
3. **Car Miles and Car Fleet Status: The following information, reported separately for**	i) Cars in Storage – measures the daily number of cars in storage on KCS owned and operated track, sorted by ownership.	Items (i-iii) Cars and miles dwelling	KCS understands the terms "in storage" and "in service" to be mutually exclusive; that is, if a car

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[9]   DRUbit™ is a proprietary heavy Canadian crude oil or bitumen that ships by rail and does not meet any of the defined categories of hazardous materials by U.S. DOT Hazardous Materials regulations and Canada's Transport of Dangerous Goods regulations.

Request	Definition of Term	Source	Formula of Calculation
privately-owned, TTX-owned, and railroad-owned cars: (i) **the weekly average number of cars per day in storage;** (ii) **the weekly average number of cars per day in service with no mileage;** (iii) **the weekly average number of cars per day in service with mileage;** (iv) **the weekly average number of car miles per day; and** (v) **the aggregate number of car miles per week.**	ii) Cars with no mileage –KCS measures the daily number of cars recording no car-miles, sorted by ownership. This measure includes all cars on KCS owned and operated track. iii) Cars with mileage –KCS measures the daily number of cars recording car-miles, sorted by ownership. This measure includes all cars on KCS owned and operated track. iv) Average Car miles per day – KCS measures the total daily car miles produced by cars on KCS owned and operated track, sorted by ownership. v) Aggregate Car miles per week – KCS measures the total daily car miles produced by cars on KCS owned and operated track, sorted by ownership.	sourced from KCS' MCS operating system through the data warehouse via dashboard / custom queries by KCS bulk team (Russell Sanders)	is "in storage" it is not "in service", and vice versa. KCS will not count cars at shipper locations as "in storage" as KCS does not always have information on the shipper's intent for private cars. "Shipper locations" include tracks leased to shippers outside their plant facilities and cars stored in transit, as well as at shipper-owned facilities. = (Accordingly, the total number of cars reported "in storage" and "in service" may not equal the "Cars On Line" totals shown on Form OMB Control No. 2140-0033, Item 3.) TTX-owned cars will be identified by car reporting marks assigned to TTX. All other cars with reporting marks ending in "X" will be identified as privately-owned, even though some such cars may be leased to railroads. Cars marked with reporting marks not ending in "X" and not assigned to TTX will be reported as railroad-owned, which may be either foreign or domestic railroads. "Mileage" and "miles" will be defined as miles traveled by local (including road switchers) and linehaul trains outside of yards. Cars that do not leave a yard and which are not "in storage" will be treated as "in service, no mileage", even if being switched in the yard. The number of cars "in storage" will be determined by a snapshot count taken on Monday each week. KCS does track average car miles per day which can be averaged to calculate (iv), and maintains data from which aggregate car miles per week can be determined for (v), but that data is not tied to the ownership of cars. KCS can do a temporary special study for purposes of this temporary reporting requirement, identifying

Request	Definition of Term	Source	Formula of Calculation
			cars with reporting marks ending in "X" (other than TTX reporting marks) as private, using TTX's reporting marks to identify TTX cars, and designating all other reporting marks are railroad-owned for purposes of (iv) and (v).
4. **Re-crews: With respect to re-crews, for each operating division and for the system: (i) the weekly number of unplanned re-crews due to compliance with federal hours of service regulations, and (ii) the re-crew rate measured as a percentage of total crew starts.**	KCS has four Transportation divisions: Midwest (East St. Louis and Cockrell, IL to Kansas City to Shreveport, LA); Speedway (Counce, TN and Tuscaloosa, AL to Meridian, MS,[10] to Shreveport, LA[11] to Fort Worth, TX, plus Hattiesburg, MS to Gulfport, MS); Southeast (Shreveport, LA to New Orleans, LA and Shreveport, LA to Beaumont and Port Arthur, TX); and Border (Beaumont, TX, to Kendleton, TX (via trackage rights), to Victoria, TX, to Robstown and Corpus Christi, TX (via trackage rights), and Corpus Christi to Laredo, TX). All recrews are treated as unplanned due to compliance with federal hours of service regulations, including recrews made in anticipation (including at instruction of the Spring, TX Joint Dispatch Center) that a train on line of road will not reach its next crew change point prior to the lapse of the crew's hours of service. KCS does not keep a system-wide metric of recrew rate as a percentage of total crew starts and usually only tracks that in area(s) with high recrew rates, but KCS can temporarily calculate that metric for these temporary reporting requirements.	Re-crews sourced from KCS' MCS operating system through the data warehouse via dashboard / custom queries	The re-crew percentage is calculated by dividing the number of re-crews by the total number of crew starts, for each operating division. The performance period is Saturday to Friday for each respective week.

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[10] The majority of the Tuscaloosa, AL to Artesia, MS portion of the Speedway Division is operated by Watco's Alabama Southern Railroad, LLC, subsidiary. Reporting will not encompass data for that portion of the Speedway Subdivision or for operation of any other KCS lines leased for operation by other carriers.

[11] The Meridian, MS to Shreveport, LA line is owned by Meridian Speedway, LLC, and operated by KCS. Data from operation of the Meridian Speedway will be included in data reported.

Request	Definition of Term	Source	Formula of Calculation
5. **First Mile / Last Mile: For each operating division and for the system, the percentage of scheduled spots and pulls that were fulfilled. (This is sometimes referred to in the industry as "Industry Spot and Pull.")**	For this metric, which KCSR maintains and utilizes, percentage fulfilled means the percentage of work on a crew's work order that is completed during a shift.	Compiled from KCSR's MCS operating system through the data warehouse via dashboard / custom queries	For both transportation division and overall system, count of cars actually spotted/pulled divided by the total number of cars scheduled to be spotted/pulled. The performance period is Saturday to Friday for each respective week.
6. **Train cancellations: For each operating division and for the system, the weekly average number of local trains cancelled per day, and the aggregate number of local trains cancelled per week, broken down by cause (crew, locomotive power, or other).** [1] **"Local trains serve customers in the vicinity of the local yard, spotting (i.e., placing for loading or unloading) inbound cars and pulling (i.e., picking up) outbound cars from each customer facility."**	For this metric, KCS will use the transportation divisions explained in relation to Item 4 above. KCS will identify "local trains" based on their designations as either local or road switcher in KCS's Management Control System (MCS), which distinguishes locals and road switchers from linehaul trains. Linehaul trains operate between terminals without working customer locations en-route. KCS does not record cause codes for local train cancellations, as most cancelled local trains are due to shippers cancelling or delaying pickup or delivery, but for purposes of this temporary reporting requirement, KCS will investigate the cause of each canceled local train and provide a designation as due to crew, locomotive power or other (including shipper request).	Sourced through KCSR's MCS operating system.	Count of trains cancelled each day, summed for the week and divided by 7 for the daily average. The performance period is Saturday to Friday for each respective week.

Request	Definition of Term	Source	Formula of Calculation
7. **Cars and Trains Placed Within 24 hrs of Original Arrival Estimate** (i) **For rail cars moving in manifest service, the percentage of cars constructively or actually placed at destination within 24 hours of the original estimated time of arrival.** (ii) **For the following types of unit trains (grain unit, coal unit, automotive unit, crude oil unit, and ethanol unit), the percentage of trains constructively or actually placed at destination within 24 hours of the original estimated time of arrival.** (iii) **For intermodal traffic, the percentage of trains that arrive at destination within 24 hours of the original estimated time of arrival. For movements involving more than one rail carrier in each of the specified categories, the destination for the upstream carrier shall be treated as the interchange location with the subsequent railroad.**	KCS understands this to be a week-by-week metric. KCS will use its existing trip plan compliance metric to measure arrival at shipper destination or interchange location, or at the holding yard for constructive placement or if the interchanging carrier delays receipt of interchanged traffic. Because trip compliance is a car-by-car metric in KCS's system, not a train-by-train metric, KCS will use the STCC codes associated with the car for identifying trip plan compliance for cars in grain, coal, automotive, and crude oil (including DRUbit™) unit trains. KCS does not operate unit ethanol trains at this time.	Sourced from KCS' MCS operating system through the data warehouse via dashboard / custom queries	Count of shipments measured as on time within 24 hours divided by total count of shipments for the period. The performance period is Saturday to Friday for each respective week.

APPENDIX C
CUSTOMER EXPERIENCE DATA REPORTING
SERVICE ACTION PLAN METRICS

Week Ending	Manifest On-Time Performance EP 770 (Sub-No. 1), Item 7(i)				Bulk On-Time Performance EP 770 (Sub-No. 1), Item 7(i)				First-Mile/Last-Mile EP 770 (Sub-No. 1), Item 5			
	CP		KCS		CP		KCS		CP		KCS	
	As Reported in Ex Parte No. 770	Four-Week Rolling Average	As Reported in Ex Parte No. 770	Four-Week Rolling Average	Aggregate of Figures Reported in Ex Parte No. 770	Four-Week Rolling Average	Aggregate of Figures Reported in Ex Parte No. 770	Four-Week Rolling Average	As Reported in Ex Parte No. 770	Four-Week Rolling Average	As Reported in Ex Parte No. 770	Four-Week Rolling Average
4/21/23	72.95%	N/A	80.27%	N/A	97.80%	N/A	94.80%	N/A	85.00%	N/A	90.60%	N/A
4/28/23	76.67%	N/A	74.41%	N/A	87.00%	N/A	92.30%	N/A	92.00%	N/A	91.50%	N/A
5/5/23	75.25%	N/A	73.32%	N/A	86.20%	N/A	91.80%	N/A	88.63%	N/A	90.70%	N/A
5/12/23	73.13%	74.50%	69.48%	74.37%	77.80%	87.20%	91.80%	92.68%	88.63%	88.56%	88.60%	90.35%
5/19/23	74.51%	74.89%	71.76%	72.24%	97.70%	87.18%	94.80%	92.68%	91.63%	90.22%	92.20%	90.75%
5/26/23	82.60%	76.37%	70.97%	71.38%	97.40%	89.78%	93.70%	93.03%	91.38%	90.06%	89.90%	90.35%
6/2/23	80.80%	77.76%	66.11%	69.58%	95.20%	92.03%	92.30%	93.15%	89.25%	90.22%	87.60%	89.58%
6/9/23	77.63%	78.89%	65.86%	68.68%	91.50%	95.45%	92.30%	93.28%	89.25%	90.38%	91.60%	90.33%
6/16/23	77.89%	79.73%	59.47%	65.60%	95.80%	94.98%	88.70%	91.75%	90.13%	90.00%	89.20%	89.58%
6/23/23	77.78%	78.52%	60.48%	62.98%	89.50%	93.00%	86.10%	89.85%	90.38%	89.75%	92.50%	90.23%
6/30/23	72.58%	76.47%	57.45%	60.82%	93.20%	92.50%	90.00%	89.28%	85.63%	88.84%	91.80%	91.28%
7/7/23	67.23%	73.87%	63.98%	60.35%	97.30%	93.95%	91.00%	88.95%	78.88%	86.25%	87.90%	90.35%
7/14/23	74.15%	72.94%	69.01%	62.73%	97.90%	94.48%	92.70%	89.95%	81.63%	84.13%	88.70%	90.23%
7/21/23	68.97%	70.73%	70.60%	65.26%	96.90%	96.33%	92.20%	91.48%	85.50%	82.91%	94.00%	90.60%
7/28/23	72.73%	70.77%	70.43%	68.51%	97.50%	97.40%	92.60%	92.13%	86.88%	83.22%	91.80%	90.60%
8/4/23	71.92%	71.94%	69.31%	69.84%	90.50%	95.70%	91.80%	92.33%	83.88%	84.47%	93.20%	91.93%
8/11/23	69.91%	70.88%	58.64%	67.25%	85.40%	92.58%	89.70%	91.58%	83.88%	85.03%	89.80%	92.20%

Week Ending	Manifest On-Time Performance EP 770 (Sub-No. 1), Item 7(i)				Bulk On-Time Performance EP 770 (Sub-No. 1), Item 7(i)				First-Mile/Last-Mile EP 770 (Sub-No. 1), Item 5			
	CP		KCS		CP		KCS		CP		KCS	
	As Reported in Ex Parte No. 770	Four-Week Rolling Average	As Reported in Ex Parte No. 770	Four-Week Rolling Average	Aggregate of Figures Reported in Ex Parte No. 770	Four-Week Rolling Average	Aggregate of Figures Reported in Ex Parte No. 770	Four-Week Rolling Average	As Reported in Ex Parte No. 770	Four-Week Rolling Average	As Reported in Ex Parte No. 770	Four-Week Rolling Average
8/18/23	70.08%	71.16%	64.79%	65.79%	85.70%	89.78%	93.30%	91.85%	85.50%	85.03%	89.50%	91.08%
8/25/23	69.05%	70.24%	60.50%	63.31%	89.50%	87.78%	91.60%	91.60%	81.88%	83.78%	91.90%	91.10%
9/1/23	64.37%	68.35%	66.12%	62.51%	92.50%	88.28%	89.70%	91.08%	91.25%	85.63%	93.30%	91.13%
9/8/23	68.78%	68.07%	64.71%	64.03%	86.10%	88.45%	91.10%	91.43%	91.00%	87.41%	92.00%	91.68%
9/15/23	64.31%	66.63%	68.03%	64.84%	91.80%	89.98%	93.20%	91.40%	92.00%	89.03%	94.90%	93.03%
9/22/23	66.19%	65.91%	69.60%	67.12%	88.40%	89.70%	92.00%	91.50%	93.75%	92.00%	95.20%	93.85%
9/29/23	65.95%	66.31%	69.90%	68.06%	93.50%	89.95%	90.00%	91.58%	93.25%	92.50%	94.40%	94.13%

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