

SUPPORTING STATEMENT - WAGE FORM C (STB Form M-350)

**A. Justification:**

1. The Surface Transportation Board (Board) has broad statutory authority to provide economic regulatory oversight of railroads, addressing such matters as rates, service, the construction, acquisition and abandonment of rail lines, carrier mergers, and interchange of traffic among carriers (49 U.S.C. 10101-11908). Wage statistics are required of Class I railroads pursuant to authority in 49 U.S.C. 11145. This collection shows, for each reporting carrier, the average number of employees at mid-month in the six job classification groups (executive, professional, maintenance-of-way, maintenance-of-equipment, transportation (train and engineer), and transportation (other than train and engineer)) that encompass all railroad employees. See 49 CFR 1246.

2. The information is used by the Board to forecast labor costs and measure the efficiency of the reporting railroads. The information also is used by the Board to evaluate proposed regulated transactions that may impact rail employees, including mergers and consolidations, acquisitions of control, purchases, and abandonments under 49 U.S.C. 10902-03 and 11326. Other Federal agencies and industry groups, including the Railroad Retirement Board, Bureau of Labor Statistics, and Association of American Railroads, depend on the information contained in this report for information regarding the operation of the regulated railroad industry.

3. Generally, no improved technology has been identified by the Board to reduce the burden of these collections. However, the Board does not prohibit the use of improved technology where appropriate. For many years, the respondent carriers have maintained this form in a computerized format. The railroads enter their data on the computerized version of the form and submit the required signed hard copy to the Board. The Board facilitates timely filing by permitting responders to fax or email the required data and then follow-up with the hard copies. The Board has considered electronic filing, but determined that because the data is maintained in a different format by each of the seven respondent carriers, electronic filing would not be useful to the Board. In addition, any requirement for this report to be filed in a specific format would necessarily impose a greater cost burden on the respondents.

4. No other Federal agency collects the information in the Wage Form C report, nor is this information available from any other source. Therefore, there will be no duplication of information. In most instances, the information sought is unique to each carrier.

5. No small entities will be affected by the collection of this information. This report is applicable only to Class I railroads, which have operating revenues in excess of \$250 million

(1991 dollars) adjusted for inflation. The Board has adopted an indexing methodology which will insure that regulated carriers are classified based on real business expansion and not from the effects of inflation.

6. The Board cannot fulfill its statutory responsibilities without monthly information on employment.

7. Board reporting requirements for this collection do not impose any of the special circumstances described in question 7.

8. The Board's 60-day notice was published in the Federal Register on August 12, 2008. See 73 FR 46977.

9. The Board does not provide any payment or gift to respondents.

10. All information collected through this report is available to the public, and is available on the Board's website.

11. There are no questions of a sensitive nature with respect to the information collected.

12. The following represents the estimates of hour burden of the collections of information:

(1) Number of respondents: 7.

(2) Frequency of response: Each Class I carrier is required to file the monthly employee report (Wage Form C). Monthly reports of railroad employment are due on or before the last day of the month to which it relates. The monthly data is compiled, printed, and prepared for PDF file to be published on the Board's website.([www.stb.dot.gov](http://www.stb.dot.gov)).

(3) Annual hour burden per respondent: 15 hours, based on 1.25 hours per monthly report estimate, which was provided by the railroad industry during the 1990's. This estimate includes the time needed to gather the information, edit, review, and complete the monthly employment report. Based on the same estimate, the seven Class I railroads require a total 105 hours to complete the monthly report. It is likely that the time required to produce this report is overstated, given the advances in computerized data collection and processing systems.

(4) Total estimate of annualized cost to respondents for the hour burdens for collection of information: It is estimated that each of the seven Class I railroad companies requires an average of no more than 1.25 hours to prepare each report. Because this collection involves data that respondents already compile to make internal business decisions, this collection does not otherwise increase the respondent's accounting burden. The total industry cost is estimated at not more than \$3,150 (7 respondents x 105 hours x \$30/hour).

13. No other costs to respondents: (a) These information collection requirements impose

no start-up costs on respondents. (b) We estimate that there are no costs for the operation, maintenance, or purchase of service associated with these reporting requirements.

14. Estimated costs to the Board: We estimate that it takes 48 hours annually to prepare a monthly compilation for our website, resulting in a cost of \$3,337.

15. Estimates in items 13 and 14 are unchanged. However, it is likely that the time required to produce this report is overstated, given the advances in computerized data collection and processing systems.

16. Plans for tabulation and publication: The information from these mid-month reports is compiled within 10 days after receiving the submissions of all seven Class I carriers, and the compilation is published on the Board's website, [www.stb.dot.gov](http://www.stb.dot.gov) at, <http://www.stb.dot.gov/econdata.nsf/AllData?OpenView&Start=1&Count=300&Expand=4#4>.

17. Not applicable.

18. Not applicable

**B. Collections of Information Employing Statistical Methods:**

Not applicable