

SUPPORTING STATEMENT - FORM STB-54

**A. Justification:**

1. Why the collection is necessary. 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). The collection in Form STB-54—carrier annual reports of the number of cars loaded and cars terminated on the reporting carrier's line—is required under 49 C.F.R. § 1247. Information reported in this form is entered into the Uniform Rail Costing System (URCS), which is a cost-measurement methodology. The Board is authorized to collect this information pursuant to 49 § U.S.C. 11145.

2. How the collection will be used. URCS was developed by the Board pursuant to 49 U.S.C. §§ 11161-62 and is used in rail rate proceedings as a tool to calculate the variable costs of providing a particular rail service in accordance with 49 U.S.C. § 10707(d). The Board also uses URCS to analyze the information that it obtains through the annual railroad waybill sample, pursuant to 49 U.S.C. §§ 721, 10707, 11144-45 and 49 C.F.R. § 1244, and in railroad abandonment proceedings to measure off-branch costs (see 49 U.S.C. § 10904(a); 49 C.F.R. § 1152.32(n)). Additionally, many other Federal agencies and industry groups depend on Form STB-54 for information regarding the number of cars loaded and terminated on the reporting carrier's line.

3. Extent of automated information collection. The Board facilitates timely filing by permitting responders to fax or email as a pdf the required signed form. The Board has considered electronic filing, but determined that because the data is maintained in different electronic formats by different respondent carriers, electronic filing would not be useful to the Board. In addition, any requirement for this report to be filed in a specific electronic format would necessarily impose a greater cost burden on the respondents.

4. Identification of duplication. No other Federal agency collects the information in this 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. Effects on small business. 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 that will ensure that regulated carriers are classified based on real business expansion, rather than the effects of inflation.

6. Impact of less frequent collections. The Board cannot fulfill its statutory responsibilities without annual information on the number of cars loaded and cars terminated on the reporting carrier's line.

7. Special circumstances. No special circumstances described in question 7 apply to this collection.

8. Compliance with 5 C.F.R. § 1320.8. The Board published a notice in the Federal Register, providing a 60-day comments period regarding this collection. See 77 Fed. Reg. 2129-01 (Jan. 13, 2012). No comments were submitted. As required, the Board has published a notice providing a 30-day comment period, with comments to be sent to OMB. See 77 Fed. Reg. 27540.

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

10. Assurance of confidentiality. All information collected through this report is available to the public.

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

12. Estimation of burden hours for respondents. The following information pertains to the estimate of burden hours associated with this collection:

(1) Number of respondents: 7.

(2) Frequency of response: Each Class I carrier is required to file the annual STB-54 report.

(3) Annual hour burden per respondent: Based on information provided by the railroad industry, it is estimated that it takes no more than 4 man-hours each time a report is prepared. The total annual burden hours for all 7 respondents is estimated at no more than 28 hours (7 (respondents) x 4 hours each). These estimates include the time needed to gather the information and edit, review, type, and proofread the data.

13. Other costs to respondents: (a) Continuing this information collection will impose no start-up costs on respondents. (b) No non-hour costs for the operation, maintenance, or purchase of services associated with this collection have been identified. These forms are submitted electronically.

14. Estimated costs to the Board: We estimate that it takes one hour (GS 13/1 hourly rate with benefits of \$52.90) to review each of the seven filings per year, five minutes (0.08 hours) (GS 14/5 hourly rate with benefits of \$70.84) to enter the data into URCS, and two hours (GS 14/10

hourly rate with benefits of \$81.26) to post the reports on the website, resulting in a cost to the Board of \$539.

15. Changes in burden hours. No change in burden hours is requested.

16. Plans for tabulation and publication: Past reports are available upon request. Future reports will be posted on the Board's website.

17. Display of expiration date for OMB approval. No exception is sought. The control number and expiration date for this collection appear on the form.

18. Exceptions to Certification Statement. Not applicable

**B. Collections of Information Employing Statistical Methods:** Not applicable