

Supporting Statement for Paperwork Reduction Act Submission

United State Rail Service Issues – Performance Data Reporting

The Surface Transportation Board (Board) seeks approval for information collections requiring certain large railroads to publicly file various data reports pertaining to service performance, primarily on a quarterly and weekly basis. This data is intended to give both the Board and its stakeholders access to near real-time information about the operations and performance of these Class I railroads, and the fluidity of the Chicago gateway. In addition, the data is expected to assist rail shippers in making logistics decisions, planning operations and production, and mitigating losses when challenging railroad operating issues arise. This data will be published on the Board's website for the benefit of the Board, carriers, shippers, and the general public.

A. Justification

1. Need for Information

The Board is, by statute, responsible for the economic regulation of common carrier railroads operating in the United States. The shipping community and our economy as a whole depend on reliable and efficient freight rail service. The proposed information collections would allow the Board to better understand current service issues and potentially to identify and resolve possible future regional and national service disruptions more quickly. Transparency would also benefit rail shippers and stakeholders, by allowing them to better plan operations and make informed business decisions based on publicly-available, near real-time data and their own analysis of performance trends over time.

2. Use of Data Collected

The Board will use this information to monitor rail service issues involving Class I railroads as they arise and to address them as quickly and efficiently as possible.

3. Reduction through Improved Technology

Respondents will email their responses to the Board.

4. Identification of Duplication

The Board is the only agency tasked with the economic regulation of freight railroads. This information is not duplicated by any other agency.

5. Minimizing Burden for Small Businesses

No small entities will be affected by the collection of this information. Only Class I railroads, which have operating revenues in excess of \$250 million (1991 dollars) adjusted for inflation, will be subject to this reporting requirement.

6. Frequency Reduction Consequences

Less frequent collections would fail to provide as near real-time information about rail service issues and thus would hinder the Board's ability to address these issues. The purpose of the collections is to obtain more frequent data on freight rail service.

7. Special Circumstances

No special circumstances apply to these collections.

8. Consultation Outside Agency

The Board sought and reviewed public comments regarding a temporary collection of similar data in connection with a recent proceeding and hearings to address rail service problems that began to emerge in late 2013. See U.S. Rail Serv. Issues—Data Collection, EP 724 (Sub-No. 3) (STB served Oct. 8, 2014). In addition, as required, the Board has published in the Federal Register its Notice of Proposed Rule Making on January 6, 2015, which provides for an approximately 60-day comment period (and an additional approximately 60-day period for reply comments) regarding these collections, with specific reference to concerns detailed in the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3549, and Office of Management and Budget regulations at 5 C.F.R. § 1320.8(d)(3). See U.S. Rail Serv. Issues—Data Collection, EP 724 (Sub-No. 4), 80 Fed. Reg. 473 (1/6/2015).

9. Payment or Gift

No payment or gift is made in connection with these collections.

10. Assurance of Confidentiality

The collections are posted on the Board's website.

11. Sensitive Information

The collections do not collect sensitive information.

12. Estimated Burden Hours.

The recurring burden hours are estimated to be no more than 1,182 hours per year, as derived in the table below. In addition, there are some one-time, start-up costs of approximately 2 hours for each respondent filing a quarterly report that must be added to the first year's total burden hours. To avoid inflating the estimated total annual hourly burden, the two-hour start-up burden has been divided by three and spread over the three-year approval period. Thus, the total annual burden hours for each of the three years are estimated at no more than 1,186.67 hours per year.

Table – Total Burden Hours (per Year)

<u>Type of Responses</u>	<u>Number of Respondents</u>	<u>Estimated Time per Response</u>	<u>Frequency of Responses</u>	<u>Total Yearly Burden Hours</u>
Weekly	7	3 hours	52/year	1,092 hours
Quarterly	7	3 hours	4/year	84 hours
On occasion	1	3 hours	2/year	6 hours
Total				1,182 hours

13. Non-hourly Costs to Respondents

There are no non-hourly burdens for respondents. The data will be submitted electronically by email.

14. Annualized Cost to the Federal Government

We estimate a total annual cost to the Board of \$65,391.02. This amount is calculated using the average weekly costs (including review of weekly, quarterly and on occasion data) set forth in the table below and then annualizing them ($\$1,257.52 \times 52 = \$65,391.02$).

Position	Type of Work	Grade Level	Hourly Rate (with Benefits)	# of Hours	Weekly Cost
Transportation Industry Analyst	Review of Data Submissions	GS 13-5	\$62.26	8	\$498.07
Section Chief	Supervisory Review of Data Submissions	GS 14-5	\$73.57	4	\$294.27
Data Manager	Processing Data and Developing Output	GS 14-5	\$73.57	4	\$294.27
Web Content Developer	Posting Data Submissions to Board Website	ED	\$68.37	2.5	\$170.52
			Total		\$1,257.52

15. Changes in Burden Hours.

Change due to new collection.

16. Publication of Data and/or Results

The collected data will be posted on the Board's website.

17. Display of Expiration date for OMB approval

There is no form on which to display the expiration date, but the date will be published in the Federal Register once OMB approves the collection.

18. Exceptions to the Certification for Paperwork Reduction Act Submissions

No exceptions are sought.

B. Collection of Information Employing Statistical Methods

Not Applicable. None of the collections involve statistical methods.