

**SUPPORTING STATEMENT
FOR REQUEST OF OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT AND 5 C.F.R. § 1320**

The Surface Transportation Board (STB or Board) requests approval for the information collections of the Uniform Railroad Costing System (URCS) Data Reporting.

A. Justification:

1. Need for Information in Collection. In a notice of proposed rulemaking, in *URCS Data Reporting*, EP 769, the Board proposed a rule to codify a longstanding voluntary, annual URCS data submission from the Association of American Railroads (AAR) so that the seven Class I railroads may submit their URCS data directly to the Board. This data is comprised of the Class I railroads' tare weight and loss and damage data for use in the Board's URCS. The Board uses URCS for a variety of regulatory functions. URCS is used in rate reasonableness proceedings and, among other things, to develop variable costs for cost models and determinations, to cost the Board's Carload Waybill Sample (OMB Control No. 2140-0015), and to provide interested parties with basic cost information regarding railroad industry operations.

Under the Board's proposal, Class I carriers would now be able to choose whether to provide tare weight and loss and damage data through AAR or to file the data on their own. This information collected is important to the Board's functions and responsibilities.

2. Use of Data Collected. The Board is authorized, under 49 U.S.C. § 11161, to maintain cost accounting rules for rail carriers. In 1989, the Board's predecessor, the Interstate Commerce Commission, adopted the Uniform Railroad Costing System (URCS) as its general-purpose costing system. *Adoption of the Unif. R.R. Costing Sys. as a Gen. Purpose Costing Sys. for All Regul. Costing Purposes*, 5 I.C.C.2d 894 (1989). As noted, the Board uses URCS for a variety of important regulatory functions, including rate reasonableness determinations, preparation of variable costs for cost models and determinations, and the Board's Carload Waybill Sample.

The submission of Tare weights is used in URCS to calculate gross ton-mile costs, while loss and damage data are used to calculate the total variable shipment costs of each rail movement. The Railroad Cost Program User Manual is available on the Board's website at www.stb.gov/reports-data/uniform-rail-costing-system/.

The Board's proposal is consistent with AAR's practice to provide the average tare weight by AAR car type code in tons and pounds, as well as the number of cars and summarize annual loss and damage expenses and the number of tons originated by commodity. Consistent with this collection, Class I carriers are already required to report, quarterly and annually, the number of tons originated on their rail lines by commodity through the freight commodity statistics (FCS) report, as in OMB Control No. 2140-0001 (Quarterly Report of Freight Commodity Statistics (Form QCS)). 49 C.F.R. § 1248.2. The Board proposes that Class I

carriers may continue to provide tare weight and loss and damage data separated by freight car types and intermodal equipment, as follows:

A	Equipped box car
B	Unequipped box car
C	Covered hopper car
D	Locomotive
E	Equipped gondola
F	Flat car
G	Unequipped gondola
H	Unequipped hopper
J	Gondola car
K	Equipped hopper car
L	Special type car
M	Maintenance of way, scale, passenger, cabooses, and end-of-train information systems
P	Conventional intermodal car
Q	Lighter weight, low-profile intermodal car
R	Refrigerator car
S	Stack car
T	Tank car
U	Container
V	Vehicular flat car
Z	Trailer

In sum, under the current rulemaking, the Board proposes that Class I carriers may individually report tare weight and loss and damage data directly to the Board. Under this option, Class I carriers would provide the tare weight totals by AAR car type code in tons and pounds and the number of cars, and the Board would calculate the average tare weight. For loss and damage data, Class I carriers would provide their total annual loss and damage expenses, number of tons originated, and loss and damage per ton by commodity using the specific commodity groupings, and the Board would consolidate the data to calculate the loss and damage per ton for all Class I carriers.

3. Reduction through Improved Technology. The Board expects all respondents, that choose to file data individually, to file electronically.

4. Identification of Duplication. No other federal agency collects the information in these collections, and the information in these collections is not available from any other source.

5. Minimizing Burden for Small Business. No small entities will be affected by the collection of this information. This reporting requirement applies only to Class I railroads, which have operating revenues in excess of \$900,000,000.

6. Consequences if Collection not Conducted or Conducted Less Frequently. Without these collections, the Board may be limited to receipt of URCS reporting data.

7. Special Circumstances. No special circumstances apply to this collection.

8. Compliance with 5 C.F.R. § 1320.8. The Board published a notice of proposed rulemaking in *URCS Data Reporting*, EP 769 (served April 29, 2022), with a total of 60 days for comments, including a 45-day initial comment period and an additional 15-day reply comment period regarding this collection. See 87 Fed. Reg. 27549 (May 9, 2022).

9. Payments or Gifts. The Board does not provide any payment or gifts for this collection.

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

11. Sensitive Information. This collection contains no information of a sensitive nature.

12. Estimated Burden Hours. 56 hours. As provided in *Table – Total Estimated Annual Burden Hours* below, respondents are expected to file with the Board URCS reporting data annually, which is estimated to take one hour with this existing data, and, due to the specific data reporting formats, to incur one-time charges of 9 burden hours each (which is annualized over three years, or 3 hours per year).

Table – Total Estimated Annual Burden Hours

Type of response	Estimated average responses per year	Estimated hours per response	Estimated annualized one-time start-up burden hours	Estimated total annual burden hours
Tare weight data	7	1	3	28
Loss and damage data	7	1	3	28
Total annual burden hours				56

Frequency: Annually

13. Estimated Total Annual Cost to Respondents. The filings may be made electronically. No non-hour burdens have been identified.

14. Annualized Cost to the Federal Government. We estimate that the maximum cost to the Board of reviewing data (4 FTE hours) and posting the data on the Board’s website (1 FTE hour) would total no more than 5 staff hours at a GS-12 and GS-14 pay grade.

15. Explanation of Program Changes or Adjustments. This ICR requests a change because the Board is opening this information collection to the Board's seven Class I railroads.

16. Plans for tabulation and publication. The information in this collection that is not confidential will be posted on the Board's website, located at www.stb.gov.

17. Display of expiration date for OMB approval. The new expiration date for this collection will be published in the Federal Register when the collection is approved by OMB.

18. Exceptions to Certification Statement. Not applicable.

B. Collections of Information Employing Statistical Methods.

Not applicable.