

SUPPORTING STATEMENT – REPORT OF RAILROAD EMPLOYEES, WAGE FORM C

A. Justification:

1. (a) 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). Class I (large) railroads are required to provide wage statistics pursuant to 49 U.S.C. § 11145. Amtrak also files this report. 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 C.F.R. pt. 1246. The Board is requesting an extension without modification of this information collection, which will otherwise expire on March 31, 2025.

2. How the collection will be used. The Board uses the information in this collection 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, including the Railroad Retirement Board and the Bureau of Labor Statistics, as well as industry groups, depend on this report for information regarding the regulated railroad industry.

3. Extent of automated information collection. The railroads submit this report electronically in a template provided by the agency. The template has been revised to include Form C in the same template as Forms A and B to allow for more efficient submission and agency processing. There has been no change to the data elements or number of data points being reported.

4. Identification of duplication. No other federal agency has economic regulatory authority over freight rail transportation. Because no other federal agency collects the information in this report, nor is this information available from any other source, there is no duplication of information.

5. Effects on 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 more than \$1.032 billion. The threshold value for Class I railroads is based on the new thresholds established in Docket No. EP 763.

6. Impact of less frequent collections. The Board cannot fulfill its statutory responsibilities without this information on employment.

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

8. Compliance with 5 C.F.R. § 1320.8. As required, the Board published a Federal Register notice on August 5, 2024, providing a 60-day comment period regarding this collection. 89 Fed. Reg. 63459. No comments were received. During the 60-day period, agency representatives held discussions in individual meetings with three carriers (respondents) regarding the collection and the changes to the forms. As also required, a Federal Register notice providing an additional 30-day comment period is being published simultaneously with this submission. 89 Fed. Reg. 88335.

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. This collection contains no information of a sensitive nature.

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: Seven

(2) Frequency of response: Monthly

(3) Annual hour burden per respondent: Based on information provided by the railroad industry, we estimate an annual per-respondent-railroad burden of not more than 15 hours, based on a per monthly report estimate of not more than 1.25 hours, which includes the time needed to gather the information and edit, review, and complete the monthly employment report. Based on this estimate, the total annual burden hours on the industry are estimated to be not more than 105 hours to complete the monthly reports.

13. No other costs to respondents: No non-hour costs for operation, maintenance, or purchase of services associated with this collection have been identified. This report is submitted to the agency electronically.

14. Estimated costs to the Board: We estimate that it takes 2.5 hours per month to process and review the submissions (GS-15), and an additional 0.5 hours per month to post reports on the website (GS-12), resulting in 36 total annual staff hours, or approximately \$2,994 annually.

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

requesting an extension without modification. While the template format is changing, the fields collected are identical to the historical collection, so there are no anticipated changes to burden hours.

Reports generated from these data are posted on the Board's website at <https://prod.stb.gov/reports-data/economic-data/>.

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