

Supporting Statement for Paperwork Reduction Act Submission

OMB Control No. 2140-XXXX

New Collection in Docket No. EP 787 of Class I Carrier Weekly Service Reporting

The Surface Transportation Board (STB or Board) requests approval of the regulations for Class I Carrier Weekly Service Reporting (OMB Control Number 2140-XXXX). In a notice of proposed rulemaking, the Board proposed to create a new collection to require Class I carriers to report two service metrics to the Board on a weekly basis.

A. Justification.

1. Why is the collection 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). Rail service reliability is essential to the economy, and the Board prioritizes monitoring rail service for emerging issues so that it can act promptly to address them. The Board has broad authority to require reports by rail carriers, 49 U.S.C. 11145, and it collects a range of data from Class I carriers that allows the Board and stakeholders to monitor railroad performance.

In its notice of proposed rulemaking, Updating Class I Rail Carrier Reporting Requirements, STB Docket EP 787 (served Sept. 30, 2025) (NPRM), the Board considered two collections. First, it reviewed whether its existing approved collection of the Class I Railroad Annual Reports still required the separate identification of certain Positive Train Control (PTC) expenditures. It found that the benefits from the supplemental PTC reporting no longer justify the burden of generating and reporting of detailed information required by 49 CFR 1241.11(b) and proposed to modify the Class I Railroad Annual Reports collection (OMB Control Number 2140-0009). Second, and as relevant to this information collection request, the Board found that, to meet its statutory duties, the Board proposed to require Class I carriers to report two service metrics on a weekly basis, as discussed in more detail below.

The Board's experience has shown that ongoing, standardized reporting of data allows the Board to observe long-term trends and assess changes in service levels, enabling it to take early action to address potential concerns. Therefore, the Board proposes weekly Class I carrier reporting of two additional service metrics: an original estimated time of arrival (OETA) metric and an industry spot and pull (ISP) metric. Reporting of these metrics would allow the Board to better monitor service reliability and address possible future regional and national service lapses. Further, Class I carriers largely track the requisite underlying information in the ordinary course of business and have recently reported similar metrics to the Board, so the proposed reporting would not be burdensome.

The Board expects that these requirements would constitute just one component of a broader effort to enhance, focus, and automate the agency's data collection. First, the Board is evaluating ways to improve data visualization on its public website and to improve the transparency and consistency of reporting across the metrics it collects. Second, the Board is considering the utility of certain existing metrics that are not widely referenced or used by the Board, shippers, railroads, or other members of the public. Finally, the Board is continuing its efforts to implement templates and other mechanisms that support automated data ingestion and processing and reduce the data elements associated with reporting. For some data collections, the Board's templates have cut required data points by more than 75 percent while improving agency analytical efficiency.

2. Why is the collection necessary. The Board collects a range of data from Class I carriers that allow the Board and shippers to monitor railroad service performance. Under the NPRM, Class I carriers would report two measures of service reliability, original estimated time of arrival (OETA) and industry spot and pull (ISP), on a weekly basis. The proposed data collection would enable the Board to monitor ongoing railroad service trends and promptly identify and address possible future regional and national service lapses.

The proposal would also benefit rail shippers and stakeholders, by allowing them to better plan operations and make informed business decisions based on publicly available, real-time data, and their own analysis of performance trends over time. Class I carriers have reported similar information in other proceedings using a process that, to the Board's understanding, can be largely automated after expeditious programming, and so the collection of this information here would not be unduly burdensome. Collection of OETA and ISP data will further the rail transportation policy goals of 49 U.S.C. 10101. It will ensure the development and continuation of a sound rail transportation system with effective competition among rail carriers and with other modes, to meet the needs of the public and the national defense (49 U.S.C. 10101(4)), foster sound economic conditions in transportation and ensure effective competition (49 U.S.C. 10101(5)), and encourage honest and efficient management, (49 U.S.C. 10101(9)). This information is not available from other sources, and each item is explained in more detail below.

OETA Reporting. The OETA metric would measure a carrier's success in meeting its estimated arrival times for shipments. The Board proposes to define OETA as the estimated time of arrival that the rail carrier provides when the shipper tenders the bill of lading or when the rail carrier receives the shipment from an interchanging carrier. Class I carriers would report, for shipments moving in manifest service, the percentage of weekly shipments that were delivered to destination no later than 24 hours after the OETA, out of all shipments in manifest service on the carrier's system during that week.

OETA reporting would give the Board insight into the timeliness of deliveries of manifest traffic system-wide. Late deliveries can, among other things, lead to supply chain disruptions, which can, in some instances, cause shippers to suspend operations. Chronic late deliveries may also force shippers to order additional shipments that would otherwise be unnecessary, and in some instances, encourage shippers to maintain unnecessarily large private car fleets to compensate for delays to shipments as well as to their own cars delayed in transit.

These shipper actions can create ripple effects, leading to increased railroad congestion. Monitoring timeliness through OETA reporting would therefore advance the Board's objective of ensuring rail service reliability, enabling the Board to take more informed and expeditious action where necessary, including through informal engagement.

ISP Reporting. The proposed ISP metric would measure a rail carrier's success in performing local placements ("spots") and pick-ups ("pulls") of loaded railcars and unloaded private or shipper-leased railcars at shippers' or receivers' facilities during a planned service window and would be calculated by comparing the number of cars for which the carrier successfully completed the requested placements or pick-ups to the number of cars for which the shipper or receiver, by the applicable cut-off time, requested a placement or pick-up. For example, if over the course of a reporting period, a carrier delivers nine of 10 requested cars within the first service window and pulls seven of 10 requested cars during a second service window, the carrier's ISP metric would be 80%.

Under the proposed collection, carriers would report ISP performance both at the system level and at the operating division level. For reporting at the operating division level, carriers would establish reporting regions using any geographic boundaries that they choose, provided that they identify the boundaries as part of their reporting, consistent with their business practices. These metrics will again help the Board to better regulate certain service performance that has shown to disrupt business timing and supply chains.

3. Extent of automated information collection. The reports will be submitted electronically.

4. Identification of Duplication. No other Federal agency has economic regulatory authority over freight rail transportation. Therefore, no other Federal agency collects the information in these weekly submissions, nor is such information available from any other source. Therefore, there is no duplication of information. In most instances, the information sought is unique to each carrier.

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 under the Board's regulations, have annual carrier operating revenues of \$900 million or more in 2019 dollars (adjusted for inflation using 2021 data, the revenue threshold for a class I rail carrier is \$943,898,958). The Board has adopted an indexing methodology to ensure that regulated carriers are classified based on real business expansion, rather than the effects of inflation. The threshold value for Class I railroads is based on the new thresholds established in Docket No. EP 763, which also provided for a deflator factor referenced to the new base year of 2019.

6. Consequences if Collection not Conducted or Conducted Less Frequently. During this time of business and supply chain disruptions, the Board needs this information to accurately and efficiently fulfill its statutory responsibilities.

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

8. Consultation Outside Agency. The Board published its proposed rule in the NPRM (90 Fed. Reg. 46779 (Sept. 30, 2025)). In a subsequent decision, the Board extended the due date for comments, which together provided for a 55-day comment period (and an additional 14-day period for reply comments) regarding this collection, with specific reference to concerns detailed in the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3521 and Office of Management and Budget (OMB) regulations at 5 C.F.R. § 1320.8(d)(3).

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

10. Assurance of Confidentiality. Some materials collected may contain commercially sensitive or confidential information, and the Board would keep such information confidential.

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

12. Estimated Burden Hours. The following information pertains to the estimate of burden hours associated with this collection:

Number of respondents: Six

Frequency of response: Weekly

Annual hourly burden per respondent and total for all respondents. No more than approximately 30 minutes per response. This estimate includes time spent reviewing instructions; searching existing data sources; gathering and maintaining the data needed; completing and reviewing the collection of information; and formatting the data according to Board instructions.

Table – Total Estimated Annual Burden Hours for Respondents

Type of filing	Estimated Hours per Response	Number of Respondents	Estimated Frequency	Total burden hours
Weekly reporting on service reliability: original estimated time of arrival (OETA) and industry spot and pull (ISP)	0.5	6	52	156
Total Burden Hours				156

13. Estimated Total Annual Cost to Respondents: There are no non-hourly burdens, as the reports will be submitted electronically.

14. Annualized Cost to the Federal Government: We estimate that it takes 2 hours weekly (GS-14 and GS-15 employees) to review the six Class I Carrier Weekly Service Reports or approximately 104 hours annually.

15. Explanation of Program Changes or Adjustments. In preparing the NPRM, Board staff reviewed its estimates of the burdens for this collection and determined the weekly hourly burdens based on the fact that respondents have most of the collected information from other business or reporting purposes.

16. Plans for tabulation and publication: The information may contain commercially sensitive data and therefore would not routinely be made public. Therefore, no plans have been made for tabulation or publication.

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

18. Exceptions to Certification Statement. No exceptions are sought.

B. Collections of Information Employing Statistical Methods:

Not applicable.