



Freight Rail Customer Alliance

Improved Transparency Freight Railroad First-Mile/Last-Mile Service Data

FRCA Position

FRCA supports improved transparency concerning the level of FIRST-MILE/LAST-MILE (FMLM) that their rail carriers actually provide to the Surface Transportation Board (STB or Board).

Issue Background

Our members also deeply appreciate that substantial information regarding railroad service data has been made available to shippers and the public generally through the reporting that the Board established in EP 724 (Sub-No. 4), *United States Rail Service Issues – Performance Data Reporting*. This docket can be accessed [here](#).

This data is of immense value to shippers in ascertaining what level of service they can reasonably expect, whether they are alone in experiencing service problems or service issues are more systemic, and whether service is generally improving or deteriorating. For customers that depend on freight rail transportation, such information can be critical. The data is also very useful for even those shippers that are fortunate to have shipping options, and their ability to divert to other modes can free up rail resources which can then be concentrated on those shippers and products that lack feasible alternatives.

Nonetheless, FRCA has become increasingly aware of and concerned by the gap between the service data that the railroads report to Board and the level of service that shippers actually receive in the real world. FRCA believes that this gap or disconnect stems in substantial part from the exclusion from the reporting of the FMLM performance for traffic that does not move in unit trains. These matters were relayed to the STB when on August 31, 2020, FRCA sent a [Letter of Concern](#) to the Board asking that this rail carrier data, in the aggregate, be reported.

As FRCA pointed out in this letter, the currently reported data to the STB omits first-mile/last-mile service for cars that are not part of unit trains. Cars that are part of a unit train are captured within unit train average train speed and dwell, and non-unit train rail cars are presumably captured within average train speed and dwell, for the period they are part of a longer train. The problem is that these individual cars are not part of a larger train during FMLM service, and thus their data is not captured during those intervals. The confluence of several recent developments makes those FMLM intervals of increased importance:

- The ascendancy of Precision Scheduled Railroading (PSR) means that more traffic that used to move in unit trains is now moving in manifest trains. There is thus more affected traffic that is not tracked.
- FMLM issues have additional significance because that is where demurrage charges, a seemingly inevitable component of PSR, will be imposed.
- Furloughs and equipment reductions under Covid-19 have resulted in diminished FMLM service for a number of shippers.

Action

On September 2, 2021, the STB issued a Decision, Docket No. EP 767, *FIRST-MILE/LAST-MILE SERVICE* which can be accessed [here](#).

The Board seeks comment from the shipping community, carriers, and the public concerning what, if any, FMLM issues they consider relevant. The Board also seeks comment on whether further examination of FMLM issues is warranted, and what, if any, actions may help address such issues, taking into account the information shippers already receive from carriers. The Board is particularly interested in knowing whether metrics to measure FMLM service that are not now being reported to the Board might have utility for the supply chain, and the potential burdens associated with any such reporting.

Status

The comment deadline in STB Docket No. EP 767, is October 12, 2021. Reply comments are due November 16, 2021.