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Ms. Cynthia Brown
Chief, Section of Administration
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

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Re: *Reciprocal Switching for Inadequate Service*, EP 711-2

Dear Ms. Brown:

I write in regard to the Board's April 30, 2024 decision in *Reciprocal Switching for Inadequate Service*.¹ The decision required, among other things, that the six Class I railroads begin reporting new, standardized forms of original estimated time of arrival ("OETA") and industry spot and pull ("ISP") data. As per the Board's decision, OETA and ISP "data must now be submitted using a standardized template to be developed by the agency."² The rule takes effect 120 days after the rule's publication in the Federal Register –September 4, 2024.

To date, however, the template and any accompanying instructions have yet to be provided by the Board. The Class I carriers have been working to adapt their systems and processes to produce the new metrics as the decision requires. However, their ability to meet the first reporting deadline is in jeopardy because of the Board's failure to provide the standardized template.

AAR respectfully requests that the Board delay the initial reporting deadline until 30 days after it provides the standardized template referenced in the decision, so the railroads will have sufficient time to comply. Your attention to this matter is greatly appreciated.

Respectfully submitted,

A handwritten signature in blue ink, enclosed in a yellow rectangular box. The signature appears to be "Amber L. McDonald".

Amber L. McDonald
Assistant General Counsel
Association of American Railroads

¹ See *Reciprocal Switching for Inadequate Service*, EP 711-2 (STB served Apr. 30, 2024) (Decision).

² *Id.* at 5.