

STATE OF ILLINOIS



ILLINOIS COMMERCE COMMISSION TRANSPORTATION BUREAU / RAIL SAFETY SECTION

Brian Vercruysse

Rail Safety Program Administrator

September 19, 2023

Ms. Arlette Mussington,
Information Collection Clearance Officer
Federal Railroad Administration
1200 New Jersey Avenue SE
Washington, DC 20590
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RE: Illinois Commerce Commission Staff Comments

Docket No. FRA-2023-0002-N-17

Title: Class I Freight-Train Length Reporting.

OMB Control Number: 2130-NEW.

ICC Staff concurs with the FRA in initiating a data collection protocol to assist in determining impacts to train operation and the public due to increased train length. ICC Staff would like to see FRA establish a database where railroads report data for every train operated including train length, car count, tonnage, crossing blockage, and associated variables. This is essential to assist state, county, and local officials in planning for railroad operations, and in coordinating their efforts with the public. Listed below are ICC Staff's comments on the Information Collection Request.

Specifically, FRA invites interested parties to comment on the following:

- Whether the information collection activities are necessary for FRA to properly execute its functions, including whether the activities will have practical utility;*
ICC Staff Comment: Yes, collection of this data is essential for FRA to complete its duties and will have great practical utility if collected correctly. Crossing blockage data should also be collected.
- The accuracy of FRA's estimates of the burden of the information collection activities, including the validity of the methodology and assumptions used to determine the estimates;*
ICC Staff Comment: Appears reasonable. Once a railroad has established the protocol; to collect and present this data, the needed time should decrease.
- Ways for FRA to enhance the quality, utility, and clarity of the information being collected;*
ICC Staff Comment: Spreadsheet based reporting should work fine and make it easy to distribute. The Surface Transportation Board (STB) has collected such data previously in the CN's Acquisition of the Elgin, Joliet, and Eastern Railway (FD 35087) and in CSX's acquisition of a Grand Trunk Western line segment in Chicago and the southern suburbs (FD 35522). Adding blocked crossing data will enhance the usefulness of this data tremendously.
- Ways for FRA to minimize the burden of information collection activities on the public, including the use of automated collection techniques or other forms of information technology.*

ICC Staff Comment: Consult STB to identify optimal reporting regulation. Suggest FRA build out a data sampling network with data collection “nodes” spaced strategically within a railroad, railroad subdivision and a state (Illinois) that would automatically collect this information (except for tonnage). Establishing automated data collection nodes will reduce the effort required by railroads to collect this data and ensure its accuracy.

Implementing data collection via spreadsheet collection, reporting and dissemination to interested parties should fulfill FRA’s desire to collect data with the least burden on the railroads and in an easy-to-use format.

FRA Proposed Data Collection Elements:

ICC Staff Concurs that the monthly collection of the data elements listed in the Notice are appropriate:

- the total number of trains operated,
- the total number of cars in those trains, as well
- the total trailing tonnage

ICC Staff Concurs that the monthly collection of the data elements listed in the Notice are appropriate:

- the number of emergency events,
- the number of communication event losses,
- the number of broken knuckles,
- the number of air hose separations,
- the number of PTC enforcements, and
- the number of locomotive engineer revocations under 49 CFR part 240.

ICC Staff suggests adding **blocked crossing information** in quantifying the number of monthly trains that block crossings for 10 minutes or more.

ICC Staff has developed an example template showing the data listed above being collected by five train length categories and by the STB’s seven standard types of train: Intermodal; Grain Unit; Coal Unit; Auto Unit; Crude oil unit; Ethanol unit; Manifest trains, and System total. Please refer to the Attachment for details. While five categories are presented, additional categories should be explored.

ICC Staff strongly desires the data be available to the public by three geographical levels.

1. Railroad system – e.g., BNSF Railway
2. Railroad subdivision – e.g., BNSF Beardstown Subdivision
3. State – e.g., Illinois

Thank you for your consideration of these comments. If you have any questions, or need additional information, please contact me at (312) 636-7760 or brian.vercruysse@illinois.gov.

Very truly yours,



Brian Vercruysse
Rail Safety Program Administrator

Reporting Metrics By Railroad System; By Railroad Subdivision and by State

Example System Report For Inter-Terminal Non-Local Trains

A. Number of Monthly <u>Trains</u> by Train Length by 7 STB Train Types	Train Length by Train Type						Train Length Statistics by Train Type					
	Under 5,000'	5,001 to 7,500	7,501 to 10,000	10,001 to 15,000	15,001 & Over	Total Trains	Mean Length	Median Length	Length @ 75th %tile	Length @ 90th %tile	Min Length	Max Length
1. Intermodal	0					0						
2. Grain unit	0					0						
3. Coal unit	0					0						
4. Auto unit	0					0						
5. Crude oil unit	0					0						
6. Ethanol unit	0					0						
7. Manifest	0					0						
8. System Total Number of Monthly Trains	0	0	0	0	0	0						

B. Number of Monthly <u>Cars</u> by Train Length by 7 STB Train Types	Number of Cars by Train Type						Car Statistics by Train Type					
	Under 5,000'	5,001 to 7,500	7,501 to 10,000	10,001 to 15,000	15,001 & Over	Total Cars	Mean # Cars	Median # Cars	# Cars @ 75th %tile	# Cars @ 90th %tile	Min # of Cars	Max Number of Cars
1. Intermodal	0					0						
2. Grain unit	0					0						
3. Coal unit	0					0						
4. Auto unit	0					0						
5. Crude oil unit	0					0						
6. Ethanol unit	0					0						
7. Manifest	0					0						
8. System Total Number of Monthly Cars	0	0	0	0	0	0						

C. Monthly <u>Trailing Tons</u> by Train Length by 7 STB Train Types	Trailing Tons by Train Type						Tonnage Statistics by Train Type					
	Under 5,000'	5,001 to 7,500	7,501 to 10,000	10,001 to 15,000	15,001 & Over	Total Tons	Mean Trailing Tons	Median Trailing Tons	Tons @ 75th %tile	Tons @ 90th %tile	Min Tons	Max Tons
1. Intermodal	0					0	4,000	3,800	5,000	5,300	3,200	5,990
2. Grain unit	0					0						
3. Coal unit	0					0						
4. Auto unit	0					0						
5. Crude oil unit	0					0						
6. Ethanol unit	0					0						
7. Manifest	0					0						
8. System Total Monthly Trailing Tons	0	0	0	0	0	0						

D. Monthly <u>Unusual Event</u> Tally by Train Length for ALL Trains	Under 5,000'	5,001 to 7,500	7,501 to 10,000	10,001 to 15,000	15,001 & Over	Total Events
Emergency Events	0					0
Crossings Blocked for > 10 Minutes	0					0
Communication Event Loss	0					0
Broken Knuckles	0					0
Air Hose Separations	0					0
PTC Enforcements	0					0
Engineer De-certifications	0					0
Total Unusual Events	0	0	0	0	0	0