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BEFORE THE  
SURFACE TRANSPORTATION BOARD

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Office of Proceedings  
August 12, 2024  
Part of  
Public Record

Docket No. NOR 42175

COMPLAINT AND PETITION OF THE NATIONAL RAILROAD PASSENGER CORP.  
UNDER 49 U.S.C. § 24308(f) FOR SUBSTANDARD PERFORMANCE OF  
AMTRAK'S SUNSET LIMITED TRAINS 1 AND 2

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**UNION PACIFIC RAILROAD COMPANY'S AMENDED RESPONSE  
TO APPENDIX A, PART IV, REQUEST NO. 15**

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**UNION PACIFIC RAILROAD COMPANY'S AMENDED RESPONSE  
TO APPENDIX A, PART IV, REQUEST NO. 15**

On September 25, 2023, Union Pacific Railroad Company ("Union Pacific") responded to the Board's order served July 11, 2023, as modified by the Board's order served August 18, 2023, requiring Union Pacific to respond to the numbered requests in Appendix A, Part IV of the July Order. More recently, in response to questions raised by Amtrak regarding Union Pacific's response to Request No. 15, which involved train lengths, Union Pacific discovered the source data used to develop its initial response contained certain discrepancies in its reporting of train lengths when compared with other data also addressing train lengths. After investigating the issue, Union Pacific has concluded its trainsheet data is the more accurate source of train length data. Further, the investigation revealed Union Pacific's initial response addressed only Union Pacific through freight trains, not all trains (i.e., trackage rights trains, yard jobs, and local trains) operating over the Sunset Limited Route during the period at issue. Accordingly, Union Pacific is providing the following Amended Response to Request No. 15:

**REQUEST NO. 15:** How many freight trains traveled on portion(s) of the Route you hosted, owned, operated, dispatched, served, or leased during the Relevant Period, that could not fit into passing sidings that the train traveled past?

**AMENDED RESPONSE TO REQUET NO. 15:** Union Pacific understands Request No. 15 to be asking how many freight trains could not fit into all passing sidings that

each train traveled past while on the Route. To answer this question, Union Pacific determined each train's maximum length while on each Union Pacific subdivision along the Route, then compared that length to the length of the shortest passing siding on the corresponding subdivision. If a train could not fit into the shortest passing siding on one or more subdivisions, it was counted once.

Based on the methodology described above, the number of freight trains is 37,158.

Respectfully submitted,

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August 12, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of August, 2024, I caused a copy of the foregoing document to be served by email on Administrative Law Judge McCarthy and all parties of record in Docket No. NOR 42175.

/s/ Michael L. Rosenthal