



Dustin Almaguer
Senior General Attorney

BNSF Railway Company
2500 Lou Menk Drive
Fort Worth, TX 76131-2828
817.352.2312 Direct
817.352.2399 Fax
Dustin.Almaguer@BNSF.com

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Secretary
Canadian Transportation Agency
Ottawa, Ontario
K1A 0N9
secretariat@otc-cta.gc.ca

Ms. Lidija Lebar, Inquiry Officer
Canadian Transportation Agency
Ottawa, Ontario
K1A 0N9
enquete.ferroviaire-Inquiry.rail@otc-cta.gc.ca

Dear Secretary

Re: Case File 19-00189

On January 29-30, 2019, the Canadian Transportation Agency held hearings in Vancouver, B.C. relating to the Agency's investigation into possible freight rail service issues in the Vancouver area. During the hearings, Members of the Panel asked BNSF Railway to elaborate on actions we took between October 2018 and January 2019 to address congestion-related challenges in the Vancouver area. The Panel also asked each railroad to provide its average dwell time in the Vancouver area. Below is BNSF's response to the questions posed by the Panel.

As mentioned during BNSF's testimony, BNSF did not issue an embargo in Vancouver during the time period in question, but we worked collaboratively with CN to restore the fluidity of the BNSF-CN interchange in response to their embargo of customer-interchanged traffic in Vancouver. As discussed during our presentation, several of the measures we enacted included:

- Initiating and facilitating three conference calls a day with CN's local operations team to coordinate our operating plans and address circumstances as they developed.
- Building bypass trains to move through the Thornton Yard without requiring switching to assist.
- Supplying additional locomotive power to CN so that they could run extra trains to process cars in Thornton Yard more efficiently.

These measures were implemented by local operating leadership and are representative of the types of measures railroads can take to address fluidity concerns at any yard or terminal location.

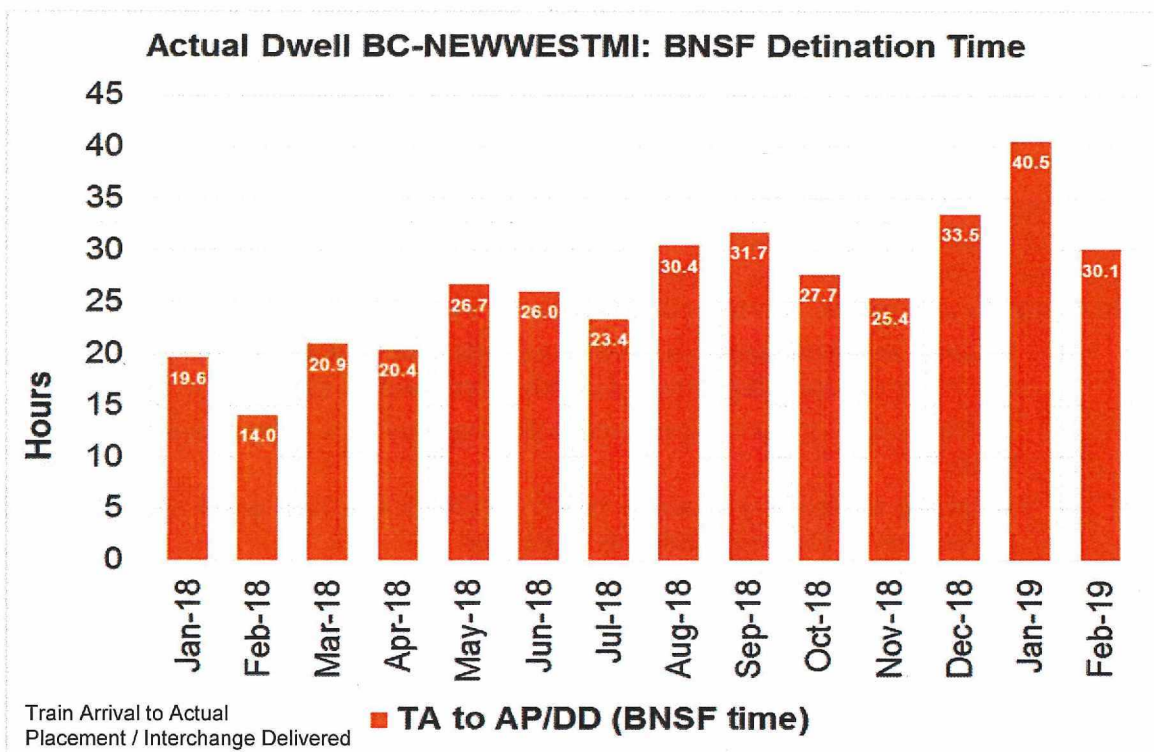
In regards to the three daily conference calls, this was a collaborative process between BNSF and CN local operations teams that was initiated by BNSF. During the calls, local leaders from Transportation, Engineering and other key departments from both railways would discuss the state of the operations, develop operating plans and outline challenges and opportunities. These calls helped to ensure that both railway teams were aligned on plans to safely improve the fluidity of train movements within Thornton Yard and the surrounding areas. The calls enabled ongoing and clear communications that helped ensure that any challenges to the operating plan could be quickly identified and remedied. Coordination calls of this nature are common even during times of fluid operations, but the increased frequency of the calls helped both BNSF and CN to identify and address issues in near real-time.

BNSF also built bypass trains to help increase efficiency at Thornton Yard. These trains were general manifest (non-unit) trains, consisting of empty and loaded cars of various commodities and

various shippers/receivers. BNSF sought to identify cars that would not require a switching event at Thornton Yard and group these cars into trains that CN could move directly through the yard after receiving them from BNSF. Cars were selected on operating characteristics without regard for customer or commodity. This effort helped to relieve congestion by eliminating the need for additional handling or switching in Thornton Yard.

Providing CN with additional locomotives during this time period also helped improve efficiency within Thornton Yard. As a longstanding industry practice, railways often have pooled-power arrangements that help to streamline the interchange process. This practice allows railways to interchange trains without exchanging locomotives, which saves time and work events. Both BNSF and CN commented on this practice during the hearing. This practice is a part of our usual operations in the Vancouver area and allowed for adjustments in locomotive flow in response to specific circumstances or opportunities that were identified by either railroad. This allowed our companies to work collaboratively to relieve congestion in times of need.

In response to the Agency’s request for dwell data in the Vancouver area, we have provided the chart below showing average dwell time at BNSF’s New Westminster, B.C. yard in 2018. New Westminster is BNSF’s serving yard for our local customers in the Vancouver area and is the interchange point for traffic we receive from CP. We deliver traffic for interchange to CP at Sapperton, B.C. For CN, the operating plan allows for direct interchange at CN’s Thornton Yard. CN builds trains destined to BNSF within Thornton Yard and notifies us when a train is ready for departure. Upon notification, BNSF departs a train from Everett, Washington to pull the train from Thornton Yard. At the same time, shipments moving from BNSF to CN are brought from Everett, Washington and placed directly into CN’s Thornton Yard. These exchanges occur twice each day. Given this operating plan, any dwell relating to BNSF-CN interchange traffic would likely be captured in data reported by CN.



Respectfully Submitted,

Dustin Almaguer