

Analysis of Freight Rail Rates for U.S. Shippers

Prepared for
American Chemistry Council

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Methodology

For this study, Escalation Consultants examined Class I railroad rate data from the Surface
u (STB) Public Use Waybill sample for all major commodity groups shipped by rail.
Data was analyzed for 2011, the most recent year available from STB, and for 2005. Escalation
-to-variable-cost ratio (RVC) for each shipment that
originated or terminated in the U.S. RVC is an important indicator for freight rail rates because a rate
greater than 180% RVC is subject to potential STB review for being unreasonably high.

For each group of related commodities, Escalation Consultants calculated the average rate for
shipments below 180% RVC (those assumed to be competitive) and the average rate for shipments
above 180% RVC (those potentially non-competitive and subject to STB jurisdiction). The difference
between th
further broke down the potentially non-competitive rates by RVC ranges (180-240%, 240-300% and
above 300%) to show the impact of the highest rates on the total premium. Data are reported for all
commodities combined, as well as for major commodity groups (2-digit Standard Transportation
Commodity Code (STCC)) and individual products (5-digit STCC) within each group for traffic originating
in different geographic regions.

Further details on the methodology and the breakdown by geographic region are provided in the
appendix.

Key Findings

These findings are based on the Public Use Waybill sample provided by the railroads to the STB:

- < In 2011, more than half (57 percent) of all rail rates exceeded 180% RVC, the threshold for a potential rate challenge before the STB.
- < The average rate for carloads above 180% RVC was \$1,335 higher than the average rate for carloads below 180% RVC, meaning that shippers paid a 53% premium for these shipments.
- < As a result, the total rate premium paid by commodity shippers in 2011 exceeded \$16 billion.
- < The commodity groups with the largest total rate premiums were coal (\$5.2 billion), chemicals and plastics (\$4.5 billion) and transportation equipment (\$1.2 billion).

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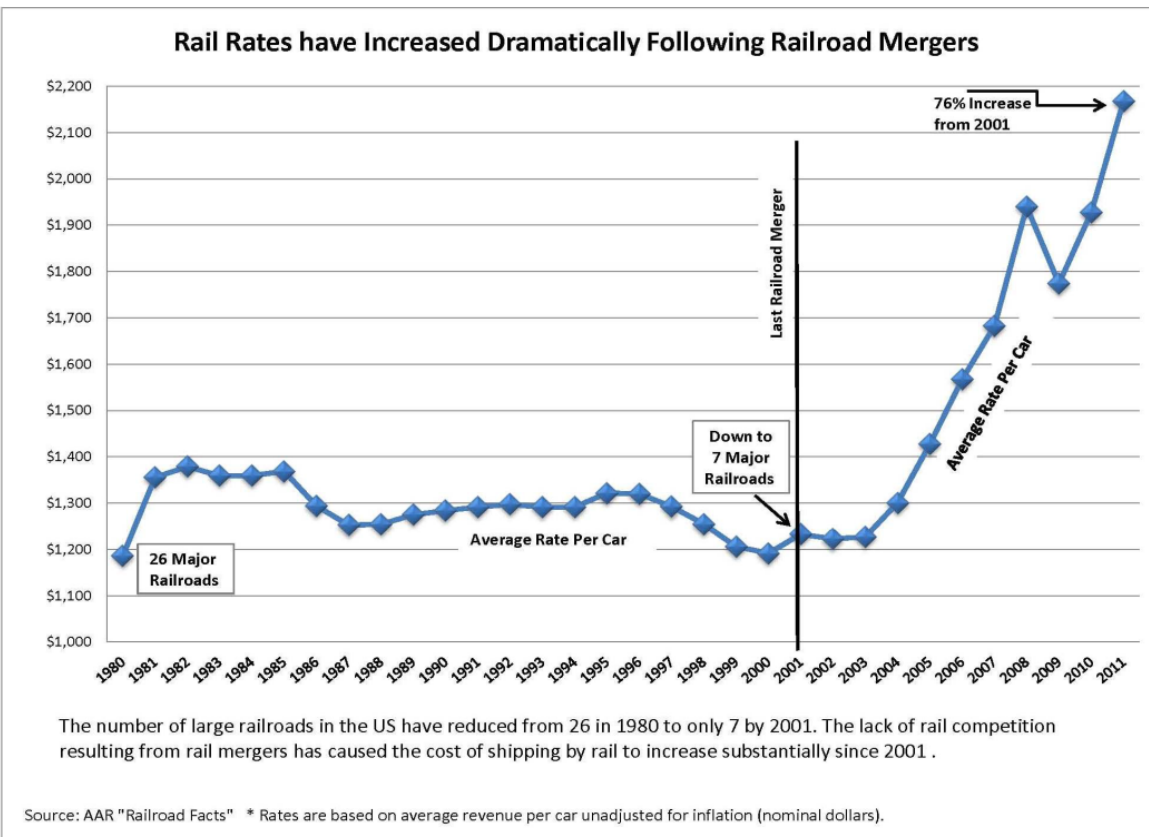
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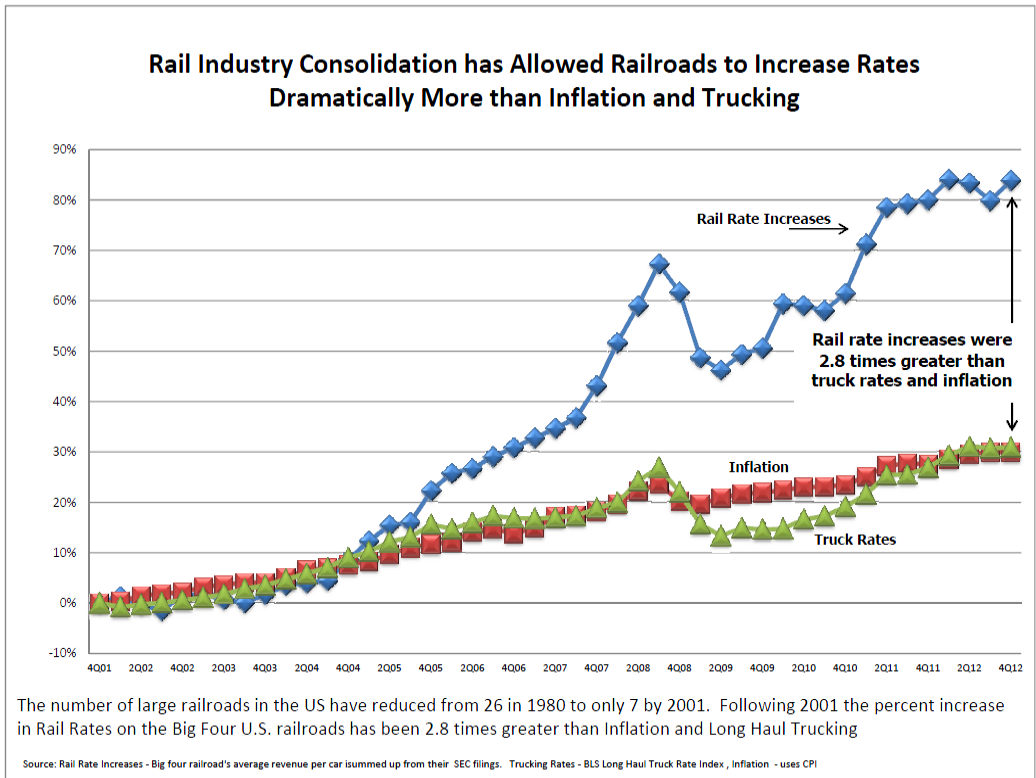
< From 2005 to 2011, the total rate premium paid by commodity shippers increased 90% while the carload volume declined by 1.1%

Background: Current Landscape and Summary of Existing Rail Rate Data

... products to their customers. These materials and products serve as the foundation for the U.S. economy and ultimately

Since the last major freight railroad reform legislation more than 30 years ago, railroads consolidated from 26 major carriers to seven. With limited competition, freight rail rates increased more than 76 percent over the past decade – nearly three times the rate of inflation and three times as much as truck rates have increased.





Excessive rates can burden U.S. manufacturing and provide a competitive advantage to foreign producers. To better understand these impacts, Escalation Consultants conducted an analysis to quantify the premiums railroads charge U.S. manufacturers.

Results from Analysis

The premiums for shippers in this study are broken out by each Standard Transportation Commodity Code (STCC) and by year (2005 and 2011). The study also explored how the volume of shipments changed between 2005 and 2011 to determine if greater demand led to an increase in the premium for shipments. Finally, the analysis also includes a detailed breakout of RVC ratios (180% - 240%, 240% - 300%, and greater than 300%).

The premium for movements with rates above a 180% RVC in this study also are broken out for each of the five rail territories in the U.S. Furthermore, detailed tables for major commodity groups as well as regional data are in the Appendix.

RVC Ranges and Rate Premium for all Commodities (2011)

In 2011, more than half (57 percent) of all rail rates exceeded 180% RVC, with a total premium of more than \$16 billion. These rates are further broken out by RVC range. This breakdown shows that more

than one-third of all freight rail traffic has more than a 240% RVC while nearly one in four shipments has an RVC greater than 300%. Most of the premium for rates above a 180% RVC is generated from rates above a 180% RVC. Table 1 below shows the breakdown of all traffic the premium paid for these movements by RVC range.

RVC Range	Percentage of Total Carloads	Premium for Rates Above 180% RVC
180-240	22%	\$2.9 Billion
241-299	12%	\$3.1 Billion
>300	23%	\$10.2 Billion
Total above 180	57%	\$16.2 Billion

Commodity Groups with Highest Total Rate Premiums (2011)

The commodity groups with the largest total rate premiums were coal (\$5.2 billion), chemicals and plastics (\$4.5 billion) and transportation equipment (\$1.2 billion). The average rate for carloads above 180% RVC was \$1,335 higher than the average rate for carloads below 180% RVC, meaning that shippers paid a 53% premium for these shipments. According to the analysis, the cost for non-competitive shipments can be up to 88 percent higher than a competitive shipment.

STCC	Description	% Total Carloads Above 180% RVC	Premium Per Carload	Premium as Percentage above Competitive Rate	Total Premium
11	Coal	55.60%	\$1,275	69%	\$5,202,315,266
28	Chemicals or Allied Products	77.20%	\$2,483	88%	\$4,485,035,101
37	Transportation Equipment	37.20%	\$1,967	68%	\$1,206,120,365
20	Food & Kindred Products	41.90%	\$3,501	41%	\$763,493,718
14	Nonmetallic Minerals Except Fuels	66.10%	\$835	56%	\$750,281,347
29	Petroleum or Coal Products	70.20%	\$1,454	51%	\$659,335,776
32	Clay, Concrete, Glass or Stone Products	74.60%	\$1,731	66%	\$605,155,699
33	Primary Metal Products	63.60%	\$1,476	41%	\$596,971,008
01	Farm Products	51.90%	\$703	22%	\$558,722,461
26	Pulp, Paper or Allied Products	42.60%	\$2,007	45%	\$449,510,098

Percent Carloads by RVC Range (2011)

The study assessed the RVC ratios for major commodity groups. The table below provides percentage of carloads with RVCs between, 180-240%, RVCs between 240-300%, and RVCs above 300%.

STCC	Description	% Total Carloads Between 180% RVC and 240% RVC	% Total Carloads Between 240% RVC and 300% RVC	% Total Carloads Greater than 300% RVC
1	Farm Products	32.90%	11.60%	7.40%
10	Metallic Ores	50.00%	13.50%	8.40%
11	Coal	15.10%	9.80%	30.60%
13	Crude Petro, Nat Gas & Natural Gas	19.10%	6.80%	12.10%
14	Nonmetallic Minerals Except Fuels	27.40%	18.40%	20.30%
19	Ordinance & Accessories	13.50%	14.10%	62.80%
20	Food & Kindred Products	25.50%	8.80%	7.50%
24	Lumber or Wood Products	21.80%	9.10%	6.20%
26	Pulp, Paper or Allied Products	24.50%	11.40%	6.70%
28	Chemicals or Allied Products	22.60%	17.20%	37.40%
29	Petroleum or Coal Products	24.60%	16.00%	29.60%
32	Clay, Concrete, Glass or Stone Products	28.70%	19.70%	26.20%
33	Primary Metal Products	25.60%	17.10%	20.90%
35	Machinery Exc. Electrical	12.10%	11.20%	71.60%
37	Transportation Equipment	21.10%	8.20%	7.80%
40	Waste or Scrap Materials	23.00%	17.10%	19.70%
41	Miscellaneous Freight Shipments	14.90%	10.30%	30.50%
48	Waste Hazardous Materials or Waste Hazard	21.90%	11.10%	39.90%
	All Commodities	22.30%	12.20%	22.80%

Change in Carloads and Premiums (2005 – 2011)

From 2005 to 2011, the total premium paid by commodity shippers increased 90% while the carload volume declined by 1.1%. This suggests that increased demand is not the primary driver of a sharp increase in shipping premiums. Hazmat issues also do not appear to be a primary factor in driving rates higher. Coal, machinery, and nonmetallic minerals, and metallic ores were among the commodities that showed the sharpest discrepancy between the premium increase and the change in carloads.

Instead, the higher rate premium reflects a general shift towards higher RVC ratios. Despite a small decline in total carloads, the number of carloads with potentially non-competitive rates (RVC ratios above 180%) jumped by 20 percent from 2005 to 2011. The number of carloads with very high rates

(RVCs exceeding 300%) increased by 35 percent over this time period.

STCC	Description	2005 Carloads	2011 Carloads	2005 Premium	2011 Premium	Carload Change	Premium Change
1	Farm Products	1,622,550	1,531,740	\$403,753,379	\$558,722,461	-5.60%	38.40%
10	Metallic Ores	709,600	699,980	\$83,855,137	\$180,206,735	-1.40%	114.90%
11	Coal	7,565,750	7,343,191	\$1,982,059,232	\$5,202,315,266	-2.90%	162.50%
13	Crude Petro, Nat Gas & Natural Gas	10,536	75,216	\$4,467,957	\$42,768,217	613.90%	857.20%
14	Nonmetallic Minerals Except Fuels	1,686,771	1,359,471	\$265,003,630	\$750,281,347	-19.40%	183.10%
19	Ordnance & Accessories	2,104	2,012	\$6,456,448	\$16,497,459	-4.40%	155.50%
20	Food & Kindred Products	1,218,389	1,259,728	\$546,940,100	\$763,493,718	3.40%	39.60%
24	Lumber or Wood Products	737,050	399,888	\$431,386,357	\$221,372,379	-45.70%	-48.70%
26	Pulp, Paper or Allied Products	719,988	525,496	\$464,916,562	\$449,510,098	-27.00%	-3.30%
28	Chemicals or Allied Products	2,019,780	2,339,161	\$2,434,614,580	\$4,485,035,101	15.80%	84.20%
29	Petroleum or Coal Products	799,245	645,906	\$426,106,840	\$659,335,776	-19.20%	54.70%
32	Clay, Concrete, Glass or Stone Products	645,246	468,754	\$440,461,084	\$605,155,699	-27.40%	37.40%
33	Primary Metal Products	718,946	636,103	\$351,596,324	\$596,971,008	-11.50%	69.80%
35	Machinery Exc. Electrical	4,405	16,854	\$7,264,139	\$87,321,303	282.60%	1102.10%
37	Trans. Equipment	579,017	1,647,003	\$401,305,356	\$1,206,120,365	184.40%	200.50%
40	Waste or Scrap Materials	552,582	437,280	\$237,041,659	\$298,351,266	-20.90%	25.90%
41	Misc. Freight Shipments	14,796	24,436	\$21,468,418	\$34,226,734	65.20%	59.40%
48	Waste Hazardous Materials or Waste Hazard	11,796	20,534	\$21,700,000	\$49,197,868	74.10%	126.70%
	Total	19,672,399	19,460,277	\$8,548,045,008	\$16,242,310,519	-1.10%	90.00%

Conclusions

American manufacturers and their customers are experiencing a sharp rise in freight rail rates that is not driven by traditional free-market forces. While demand decreased from 2005-2011, the rate premium soared. Few commodities have been spared by skyrocketing freight rail rates. Both hazardous and non-hazardous shipments have experienced soaring freight rail rates. Only lumber and wood products experienced a sharp decline both in total rate premium and demand. Nearly one out of every four shipments today are shipped at rates exceeding 300% RVC or three times the variable cost of the shipment. In 2005, just one in every six shipments faced premiums that high. Increased demand and liability are clearly not driving freight rail rates. This unique business dynamic provides tremendous pricing power to a handful of freight railroads.

Appendix

Methodology for Calculating the o

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The 2011 Public Use Waybill Sample (Sample) was used to calculate the premium paid by shippers to railroads for moving their freight. The Sample represents 100% of all rail shipments that originate or terminate in the U.S. The Sample is a collection of railroad waybill records submitted by railroads to the Surface Transportation Board (STB); it is roughly a 3% sample of all rail movements which is then expanded to represent 100% of all rail traffic. The 2011 Sample consists of 599,588 waybills. Escalation Consultants analyzed 248,596 Sample records, which included all commodity movements in the Sample except for Intermodal. The 248,596 Sample records, when expanded to represent all rail traffic for these types of movements, total to 19,461,517 carloads in 2011. When the 19,672,399 carloads analyzed in 2005 are added to the 2011 carloads a total of 39,132,676 carloads were analyzed to

Movement characteristics for each record were evaluated to determine the number of interchanges, car type, weight/car, rail territory of origin, destination and all relevant movement parameters so that railroad variable costs could be computed. All movements were run through the Optimized Rail Bid Evaluation (ORBE) batch processing program that can analyze the cost for hundreds of thousands of movements utilizing the STB costing program, the Uniform Rail Costing System (URCS). The ORBE calculated the following for each movement:

- < Railroad long term variable cost; and,
- < The Revenue to Variable Cost Ratio (RVC) ($RVC = \text{Revenue} \div \text{Variable Cost}$).

The Staggers Rail Act of 1980 set a legislative demarcation for non-competitive rail rates as those rates with an RVC of 180% or greater. The 180% RVC level is referred to as the Jurisdictional Threshold, signifying the STB has no authority over tariff rates of less than 180%, therefore. The ORBE established the non-competitive and competitive status by the RVC for each movement. In this Exhibit, non-competitive movements are defined as those with an RVC of 180% or greater and competitive movements are defined as those with an RVC of less than 180%.

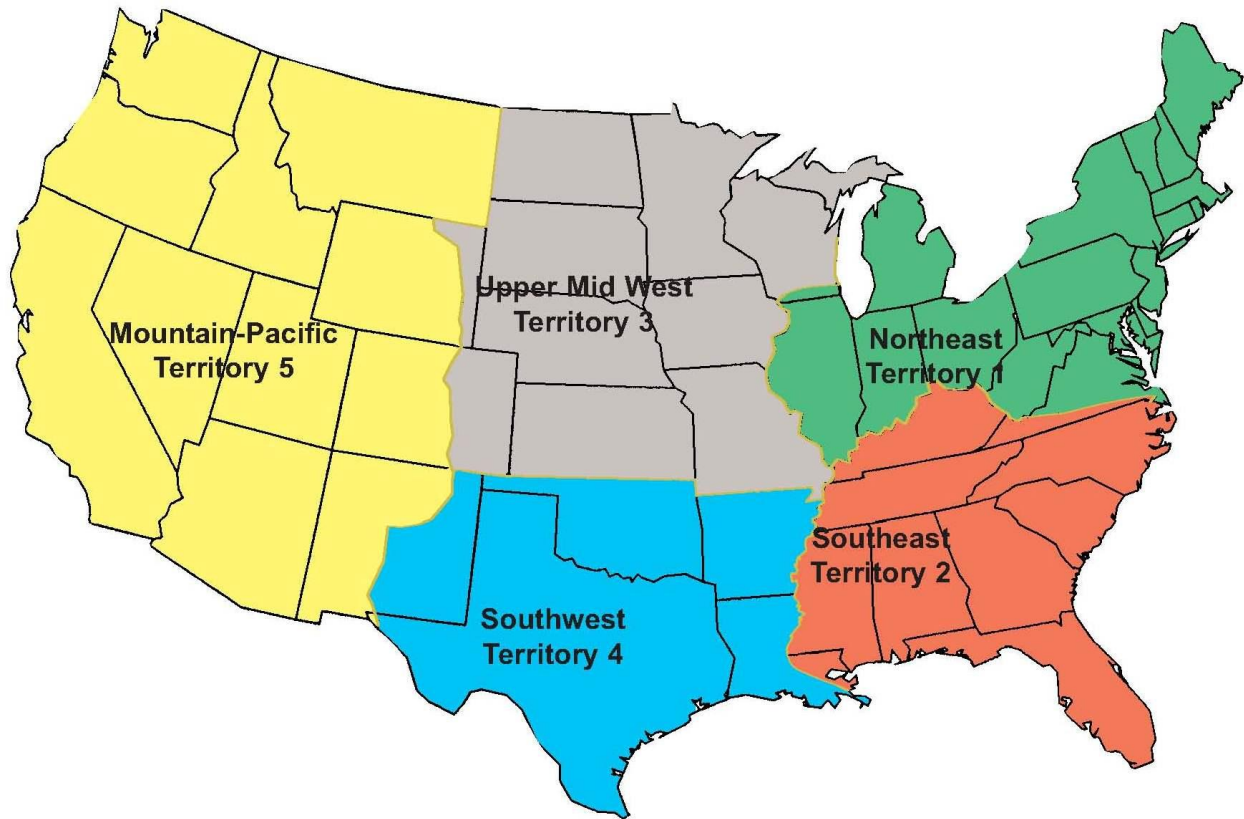
The rate premium for commodities is determined by calculating the average difference between the rate per car above and below a 180% RVC for each commodity in each rail territory and then multiplying territory. The sum of the premium amounts for all territories represents the total rate premium for a commodity. A map showing the location of each rail territory is found on page 11.

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Waybill data in the Sample have been used by shippers, consultants, railroads and various federal and state governmental agencies in a wide array of cases before the ICC (now the STB), state regulatory bodies and the courts. The rate premium calculations in the Study utilized the Public Use Waybill Sample which contains the most detailed data the STB makes available to the public on rail movements.

Rail Territories

Breakdown of Geographic Area for Each Origin Rail Territory



Note: Territory 0 includes Canadian and Mexican moves.

Commodity Specific Data

Farm Products - STCC 01									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	\$3,271	177%	21,290	\$4,177	227%	17,575	\$906	51%	\$15,914,721
Northeast	\$2,288	136%	214,551	\$3,409	265%	184,197	\$1,121	129%	\$206,575,328
Southeast	\$2,218	147%	13,799	\$3,030	275%	16,412	\$812	128%	\$13,333,972
Upper Midwest	\$3,867	152%	415,802	\$4,195	229%	363,843	\$328	76%	\$119,455,655
Southwest	\$2,465	178%	26,763	\$3,433	256%	126,037	\$968	78%	\$121,966,215
Mountain Pacific	\$3,416	177%	44,905	\$4,357	233%	86,566	\$941	56%	\$81,476,569
Average	\$3,182	156%		\$3,885	243%		\$703	87%	
Total			737,110			794,630			\$558,722,461
Total US Only			715,820			777,055			\$542,807,740

Cost of Non-Competitive Rates Details for Farm Products-STCC 01					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
01137-Wheat Exc. Buckwheat	153,996	33%	316,298	67%	\$244,886,680
01132-Corn Exc. Popcorn	392,167	55%	314,746	45%	\$168,332,405
01144-Soybeans	104,135	50%	105,662	50%	\$85,847,124
01131-Barley	15,064	52%	13,640	48%	\$10,212,024
01136-Sorghum Grains	4,220	37%	7,275	63%	\$5,634,993
01149-Oil Kernels, Nuts or Seeds, NEC Exc. Edible Tree Nuts	5,742	48%	6,245	52%	\$4,464,243
01195-Potatoes, Other Than Sweet	5,868	78%	1,608	22%	\$4,456,001
01221-Apples	1,532	52%	1,440	48%	\$4,041,992
01133-Oats	10,456	64%	6,000	36%	\$3,880,348
01313-Onions, Green	716	35%	1,336	65%	\$3,418,540
01159-Field Seeds, Exc. Seeds	1,964	71%	820	29%	\$2,477,312
01224-Grapes	256	30%	600	70%	\$2,197,187
01341-Beans Dry Ripe	8,408	76%	2,680	24%	\$1,975,375
01143-Peanuts	2,520	64%	1,440	36%	\$1,875,060
01214-Oranges	2,120	55%	1,752	45%	\$1,850,848
01312-Carrots	1,640	75%	552	25%	\$1,601,068

Cost of Non-Competitive Rates Details for Farm Products-STCC 01 (continued)

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
01141-Cottonseeds	8,186	71%	3,364	29%	\$1,389,680
01139-Grain	5,324	89%	672	11%	\$1,059,739
01398-Cantaloupes, Melons or Muskmelons Exc. Watermelons	484	54%	420	46%	\$1,059,225
01343-Cowpeas, Lentils or Lupines	1,472	77%	432	23%	\$907,153
01142-Flaxseeds	1,096	40%	1,624	60%	\$902,673
01135-Rye	872	53%	768	47%	\$896,225
01152-Popcorn	356	60%	240	40%	\$873,103
01334-Celery	40	13%	264	87%	\$870,158
01191-Fodder, Hay or Roughage Exc. Chopped/Ground/Pulverized	880	81%	200	19%	\$509,627
01134-Rice, Rough	944	25%	2,868	75%	\$495,720
01331-Broccoli	576	74%	204	26%	\$438,477
01915-Herbs (Seeds, Leaves, Roots, Etc.)	0	0%	200	100%	\$409,825
01342-Peas, Dry	3,168	90%	340	10%	\$349,295
01227-Pears	200	49%	212	51%	\$344,536
01294-Cocoa Beans	40	25%	120	75%	\$323,520
01335-Lettuce	344	72%	132	28%	\$225,069
01318-Onions, Dry	1,320	85%	240	15%	\$202,732
01226-Peaches	0	0%	36	100%	\$176,298
01394-Tomatoes	0	0%	80	100%	\$108,917
01151-Lawn Grass Seeds	240	86%	40	14%	\$17,600
01219-Citrus Fruits	0	0%	80	100%	\$11,687
01295-Coffee, Green	240	100%	0	0%	\$0
01991-Chopped/Ground/Pulvzd Hay/Straw/Related Ag. Prod. Exc. Alfalfa	320	100%	0	0%	\$0
01992-Chopped, Ground or Pulverized Alfalfa	204	100%	0	0%	\$0
Total	737,110	48%	794,630	52%	\$558,722,461

Coal-STCC 11									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	\$0	0%	7,845	\$0	0%	0	\$0	0%	\$0
Northeast	\$1,482	141%	167,992	\$2,935	472%	1,953,346	\$1,453	331%	\$2,837,382,322
Southeast	\$1,960	148%	65,540	\$3,396	443%	771,771	\$1,437	296%	\$1,108,685,988
Upper Midwest	\$2,139	117%	2,659,169	\$3,362	227%	730,210	\$1,224	110%	\$893,484,514
Southwest	\$476	180%	40	\$898	325%	14,324	\$422	145%	\$6,044,839
Mountain Pacific	\$2,570	134%	363,228	\$3,155	295%	609,726	\$585	161%	\$356,717,603
Average	\$1,849	137%		\$3,124	396%		\$1,275	259%	
Total			3,263,814			4,079,377			\$5,202,315,266
Total US Only			3,255,969			4,079,377			\$5,202,315,266

Cost of Non-Competitive Rates Details for Coal-STCC 11					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
11212-Prepared Bituminous Coal, Exc. Ground or Other than for Fuel	3,260,884	45%	4,033,292	55%	\$5,176,420,757
11112-Cleaned of Prepared Anthra (Crushed, Scrnd, Sized)	600	9%	5,897	91%	\$15,420,539
11221-Lignite, Prepared or Raw. Exc. Ground or Other than for Fuel	2,042	5%	36,169	95%	\$8,178,231
11211-Raw Bituminous Coal	80	2%	3,815	98%	\$2,187,571
11219-Bituminous Coal Waste	208	50%	204	50%	\$108,168
Total	3,263,814	44%	4,079,377	56%	\$5,202,315,266

Nonmetallic Minerals-STCC 14

	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	\$5,108	153%	22,288	\$8,316	239%	2,720	\$3,208	86%	\$8,726,220
Northeast	\$1,220	136%	123,695	\$2,236	298%	177,672	\$1,016	162%	\$180,566,377
Southeast	\$796	130%	178,809	\$1,510	284%	205,865	\$714	154%	\$146,897,495
Upper Midwest	\$4,113	155%	86,798	\$5,636	254%	133,907	\$1,523	99%	\$203,875,949
Southwest	\$951	179%	36,802	\$1,431	276%	283,089	\$480	98%	\$135,890,125
Mountain Pacific	\$1,375	140%	12,784	\$2,157	326%	95,042	\$782	185%	\$74,325,181
Average	\$1,497	151%		\$2,333	284%		\$835	133%	
Total			461,176			898,295			\$750,281,347
Total US Only			438,888			895,575			\$741,555,127

Cost of Non-Competitive Rates Details for Nonmetallic Minerals-STCC 14

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
14413-Industrial Sand, Crude, Ground or Pulverized Abrasive	61,924	24%	191,622	76%	\$346,750,030
14219-Broken or Crushed Stone or Riprap	198,122	30%	467,058	70%	\$235,564,419
14716-Sulphur, Crude, Liquid, Molten or Solid	53,903	63%	31,201	37%	\$66,831,186
14412-Gravel (Aggregate or Ballast)	13,929	22%	49,040	78%	\$26,634,340
14714-Apatite or Phosphate Rock, Clay or Sand	64,435	38%	103,044	62%	\$21,106,655
14715-Rock Salt, Crude, Crushed, Lump Exc. Sodium Chloride	12,571	40%	18,498	60%	\$14,377,657
14711-Barite, Crude (Heavy Spar or Tiff) Ground/Otherwise Treated	3,680	36%	6,644	64%	\$9,363,326
14511-Bentonite, Crude	1,632	34%	3,120	66%	\$6,907,025
14919-Nonmetallic Minerals/Loam/Soil/Topsoil	2,396	38%	3,952	62%	\$5,888,464
14411-Sand (Aggregate or Ballast) Exc. Abrasive	8,180	42%	11,366	58%	\$5,560,674
14918-Diatomaceous Oral Earth, Crude	920	32%	1,920	68%	\$2,682,339
14913-Native Asphalt or Bitumen's	60	3%	2,239	97%	\$1,848,735
14911-Anhydrite or Gypsum, Crude	1,528	39%	2,424	61%	\$1,788,048
14519-Ceramic or Clay Crude	600	45%	720	55%	\$903,104
14514-Ball or Kaolin Clay, Crude	228	18%	1,040	82%	\$845,429
14914-Pumice or Pumicite	600	50%	604	50%	\$755,502
14111-Dimension Stone, Quarry	1,344	73%	504	27%	\$598,354
14713-Borate, Potash or Soda, Crude	76	17%	364	83%	\$546,878
14712-Fluorspar (Fluorite or Florspar), Crude	668	76%	208	24%	\$482,743
14211-Agricultural Limestone, Broken or Crushed	740	42%	1,007	58%	\$390,030
14212-Fluxing Limestone or Stone, Broken or Crushed	31,440	96%	1,480	4%	\$190,855
14719-Chemical or Fertilizer Minerals	0	0%	200	100%	\$178,890

Cost of Non-Competitive Rates Details for Nonmetallic Minerals-STCC 14 (continued)

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
14512-Fire Clay, Crude	80	67%	40	33%	\$86,663
14213-Dolomite, Broken or Crushed	1,720	100%	0	0%	\$0
14916-Natural Abrasives, Flour or Sized Grains, or Powders	240	100%	0	0%	\$0
14917-Peat, Natural	160	100%	0	0%	\$0
Total	461,176	34%	898,295	66%	\$750,281,347

Food or Kindred Products-STCC 20										
	Avg. Rate Below 180% RVC				Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads		Rate	RVC	Carloads	Rate	RVC	
Canada/Mexico	\$4,750	151%	32,764		\$6,883	231%	23,194	\$2,133	80%	\$49,469,402
Northeast	\$2,535	135%	166,236		\$4,205	277%	148,262	\$1,670	142%	\$247,641,642
Southeast	\$2,827	149%	59,276		\$4,383	264%	36,040	\$1,556	114%	\$56,085,613
Upper Midwest	\$3,440	142%	332,913		\$4,574	228%	190,971	\$1,134	86%	\$216,614,029
Southwest	\$3,469	153%	66,797		\$4,573	247%	68,691	\$1,103	94%	\$75,772,161
Mountain Pacific	\$6,020	150%	73,968		\$7,965	255%	60,616	\$1,945	106%	\$117,910,872
Average	\$3,501	143%			\$4,948	250%		\$1,447	107%	
Total			731,954				527,774			\$763,493,718
Total US Only			699,190				504,580			\$714,024,316

Cost of Non-Competitive Rates Details for Food or Kindred Products-STCC 20					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
20461-Corn Syrup	83,002	58%	59,464	42%	\$110,300,203
20923-Soybean Cake/Flour/Grits/Meal/Other By-Prod.	105,973	61%	67,383	39%	\$68,917,470
20831-Malt	21,136	55%	17,144	45%	\$55,518,183
20621-Sugar, Granulated or Powdered, Sugar Cubes or Tablets	22,436	40%	33,088	60%	\$55,373,165
20859-By-Prod. Of Liquor Distilling	43,738	48%	46,516	52%	\$49,383,963
20821-Beer/Ale/Porter/Stout/Other Fermented Malt Liquors	21,400	43%	28,520	57%	\$45,750,922
20373-Frozen Vegetables	12,888	53%	11,596	47%	\$42,356,926
20421-Prepared Feed Other than Dog/Cat/Other Pet Food	52,761	55%	42,845	45%	\$41,772,828
20939-Nut or Vegetable Oil Cake or Meal or Other By-Prod.	26,200	60%	17,322	40%	\$31,897,461
20462-Corn Starch	12,908	52%	11,936	48%	\$22,040,843
20933-Nut or Vegetable Oils Exc. Corn	36,760	65%	19,568	35%	\$18,812,995
20411-Wheat Flour Exc. Blended or Prepared	33,444	56%	25,760	44%	\$17,759,785
20995-Mixed Loads of Food or Kindred Prod.	5,640	54%	4,720	46%	\$17,029,097
20419-Flour or Other Grain Prod.	16,904	64%	9,508	36%	\$15,287,455
20841-Wine, Brandy or Brandy Spirits or Fruit Spirits	17,424	82%	3,728	18%	\$14,456,381
20921-Soybean Oil, Crude or Refined Exc. Edible Oils	46,716	68%	21,856	32%	\$11,162,574
20143-Grease or Inedible or Other Inedible Animal Oil Mill Prod.	13,380	55%	11,120	45%	\$8,855,321
20129-Meat, Fresh Frozen	5,440	65%	2,920	35%	\$8,814,415
20332-Canned Vegetables	2,760	50%	2,760	50%	\$8,611,292
20334-Juice, Fruit or Vegetable, Other Than Frozen Exc. Cider	9,920	85%	1,760	15%	\$8,587,540
20251-Cheese Exc. Cottage Cheese	2,528	58%	1,800	42%	\$8,222,362

Cost of Non-Competitive Rates Details for Food or Kindred Products-STCC 20 (continued)

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
20871-Misc. Flavoring Extracts, Syrups or Compounds	160	11%	1,320	89%	\$7,701,480
20161-Dressed Poultry or Small Game, Fresh Frozen	3,960	75%	1,320	25%	\$7,263,696
20851-Distilled, Rectified or Blended Liquors	1,120	23%	3,824	77%	\$7,152,341
20336-Catsup or Other Tomato Sauces	15,280	80%	3,840	20%	\$6,879,872
20144-Animal Refuse,Tankage,Meat Meal,Dried or Related Animal By-Prod.	9,668	67%	4,684	33%	\$5,913,642
20467-Wet Process Corn or Mill By-Prod.	8,928	54%	7,568	46%	\$4,272,964
20441-Rice, Cleaned	9,060	61%	5,720	39%	\$4,188,492
20443-Brewers Rice	3,080	47%	3,520	53%	\$3,838,209
20823-Malt Extracts or Brewers Spent Grains	6,128	30%	14,040	70%	\$3,623,063
20131-Lard	760	46%	880	54%	\$3,305,734
20139-Meat Prod.	4,680	57%	3,600	43%	\$3,261,254
20465-Corn Oil	11,560	80%	2,920	20%	\$3,225,088
20616-Sugar Molasses Exc. Blackstrap	2,616	50%	2,568	50%	\$3,178,997
20463-Corn Sugar	1,000	41%	1,440	59%	\$3,067,636
20911-Cottonseed Oil, Crude or Refined Exc. Edible Oils	2,468	48%	2,660	52%	\$2,957,396
20412-Wheat Bran, Middlings Shorts	4,448	56%	3,516	44%	\$2,913,326
20413-Corn Meal or Flour Exc. Animal or Poultry Feed	8,240	74%	2,920	26%	\$2,865,287
20343-Dehydrated or Dried Potatoes or Prod. Exc. Potato Chips	240	18%	1,080	82%	\$2,459,280
20617-Blackstrap Molasses	6,280	71%	2,592	29%	\$2,162,437
20418-Grain Mill By-Prod. Exc. Wheat Bran, Middlings, Red Dog	1,808	66%	912	34%	\$2,023,012
20471-Dog, Cat or Other Pet Food, Exc. Canned	1,356	68%	640	32%	\$1,981,621
20233-Evaporated or Condensed Milk Prod.	80	14%	480	86%	\$1,863,040
20391-Mixed Loads Of Canned or Preserved Fruits, or Vegetables	3,120	80%	760	20%	\$1,220,581
20416-Oat Meal or Flour	1,880	68%	880	32%	\$1,208,803
20993-Sweetening Syrups or Molasses	400	48%	440	52%	\$1,189,624
20442-Rice Flour, Bran or Meal	640	40%	960	60%	\$1,187,200
20914-Cottonseed Cake or Meal or By-Prod.	2,068	55%	1,672	45%	\$1,026,583
20121-Carcasses Fabricated or Primal Cuts/Boneless Meat/Fresh Frozen	1,640	91%	160	9%	\$805,257
20469-Wet Process Corn Milling or Similar Mill	5,720	88%	760	12%	\$791,876
20211-Creamery Butter	640	70%	280	30%	\$782,178
20622-Sugar, Liquid or Syrup	0	0%	1,120	100%	\$777,191
20511-Bread or Other Bakery Prod. Exc. Biscuits, Crackers	2,320	76%	720	24%	\$592,041
20466-Starch Exc. Corn	400	50%	400	50%	\$586,068
20339-Canned Fruits or Vegetables	880	81%	200	19%	\$561,612
20472-Canned Dog, Cat or Other Pet Food	120	60%	80	40%	\$531,264

Cost of Non-Competitive Rates Details for Food or Kindred Products-STCC 20 (continued)

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
20619-Sugar Mill Prod. or By-Prod.	5,788	84%	1,088	16%	\$509,048
20134-Canned Meat	0	0%	80	100%	\$436,087
20149-Animal By-Prod.	680	50%	680	50%	\$396,603
20625-Sugar Refining By-Prod.	1,880	66%	960	34%	\$376,627
20942-Marine Oil Mill By-Prod. Viz. Meal, Scrap or Tankage	360	50%	360	50%	\$364,006
20259-Special Dairy Prod. By-Prod.	648	80%	160	20%	\$362,695
20941-Marine Oil Mill Prod.	120	43%	160	57%	\$357,691
20998-Tea or Instant Tea	0	0%	80	100%	\$309,016
20231-Dry Milk Prod.	1,240	84%	240	16%	\$291,361
20111-Carcasses Fabricated/Primal Cuts/Boneless Meat/Fresh/Chilled	0	0%	200	100%	\$242,126
20352-Pickles or Other Pickled Prod.	120	60%	80	40%	\$236,360
20449-Milled Rice or By-Prod.	200	45%	240	55%	\$180,984
20331-Canned Fruits	480	80%	120	20%	\$170,634
20931-Linseed Oil ,Crude or Refined Exc. Edible Oils	832	84%	160	16%	\$166,753
20141-Hides, Not Tanned/Cattle/Horse/Mule/Sheep/Swine	0	0%	80	100%	\$163,467
20371-Frozen Fruits	592	71%	240	29%	\$144,905
20961-Shortening or Cooking or Salad Oils Exc. Corn Oil	160	36%	280	64%	\$142,728
20915-Cotton Linters or Regins	816	79%	216	21%	\$135,522
20414-Rye Flour or Meal	120	43%	160	57%	\$99,578
20999-Food Preparations or By-Prod.	160	67%	80	33%	\$56,275
20611-Raw Cane or Beet Sugar	40	50%	40	50%	\$27,389
20359-Sauces or Seasonings, Exc. Catsup or Tomato Sauces	360	90%	40	10%	\$18,787
20713-Chocolate or Cocoa Prod. or By-Prod.	40	50%	40	50%	\$15,297
20158-Poultry or Small Game By-Prod., Fresh or Chilled	360	75%	120	25%	\$13,991
20832-Malt Flour or Sprouts	40	50%	40	50%	\$4,242
20712-Nuts, Coated, Cooked, Roasted or Salted	0	0%	40	100%	\$2,224
20323-Canned Bean Specialties, Pork and Beans/Baked Beans	120	100%	0	0%	\$0
20342-Dehydrated or Dried Vegetables/Soup Mixes	40	100%	0	0%	\$0
20361-Frozen Processed (Packaged) Fish or Other Seafood	372	100%	0	0%	\$0
20372-Frozen Juices or Ades	120	100%	0	0%	\$0
20861-Soft Drinks/Mineral Waters/Bottled/in Bulk Exc. Drinking Waters	40	100%	0	0%	\$0
20994-Baking Powder or Yeast	120	100%	0	0%	\$0
Total	731,954	58%	527,774	42%	\$763,493,718

Pulp, Paper or Allied Products-STCC 26									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	\$6,379	137%	52,280	\$9,191	247%	31,800	\$2,812	110%	\$89,422,757
Northeast	\$3,643	129%	31,560	\$5,486	255%	20,720	\$1,843	126%	\$38,194,641
Southeast	\$3,750	127%	129,948	\$5,596	257%	88,752	\$1,846	130%	\$163,850,272
Upper Midwest	\$4,017	136%	23,920	\$6,452	272%	22,560	\$2,435	136%	\$54,929,643
Southwest	\$4,552	140%	47,120	\$6,482	245%	42,480	\$1,930	105%	\$81,977,054
Mountain Pacific	\$5,267	148%	16,716	\$6,465	236%	17,640	\$1,198	88%	\$21,135,729
Average	\$4,412	134%		\$6,419	253%		\$2,007	119%	
Total			301,544			223,952			\$449,510,098
Total US Only			249,264			192,152			\$360,087,340

Cost of Non-Competitive Rates Details for Pulp, Paper or Allied Products-STCC 26					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
26311-Fibreboard/Paperboard Pulp Board Exc. Building Insulating Board	150,588	54%	125,996	46%	\$212,763,957
26213-Printing Paper/Coated/Uncoated/Coated Grnd Wood Paper	44,360	61%	28,600	39%	\$97,958,631
26111-Pulp	72,316	65%	38,476	35%	\$72,812,537
26211-Newsprint	13,080	52%	12,200	48%	\$30,362,172
26212-Ground Wood Paper, Uncoated	15,360	55%	12,520	45%	\$20,974,353
26112-Pulp Mill By-Products	2,720	38%	4,520	62%	\$10,463,692
26214-Wrapping Paper, or Coarse Paper	2,080	61%	1,320	39%	\$3,426,448
26217-Special Industrial Paper or Paper Car Liners	680	71%	280	29%	\$737,381
26219-Paper, Exc. Building Paper	120	75%	40	25%	\$10,926
26218-Sanitary Tissue Stock	120	100%	0	0%	\$0
26431-Paper Bags	120	100%	0	0%	\$0
Total	301,544	57%	223,952	43%	\$449,510,098

Chemicals or Allied Products-STCC 28

	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	\$3,794	140%	83,856	\$6,527	295%	130,931	\$2,733	155%	\$357,871,443
Northeast	\$2,537	144%	94,259	\$5,615	414%	341,835	\$3,078	271%	\$1,052,220,532
Southeast	\$2,476	156%	86,577	\$5,249	409%	420,867	\$2,773	253%	\$1,166,954,118
Upper Midwest	\$2,906	144%	72,308	\$4,454	269%	294,148	\$1,548	125%	\$455,332,838
Southwest	\$2,715	133%	163,166	\$5,055	350%	420,496	\$2,340	217%	\$983,860,799
Mountain Pacific	\$3,585	160%	32,588	\$5,951	391%	198,130	\$2,366	231%	\$468,795,372
Average	\$2,830	146%		\$5,313	364%		\$2,483	218%	
Total			532,754			1,806,407			\$4,485,035,101
Total US Only			448,898			1,675,476			\$4,127,163,659

Cost of Non-Competitive Rates Details for Chemicals or Allied Products-STCC 28

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
28211-Plastic Materials, Exc. Fabricated Plastic Prod.	151,552	29%	369,576	71%	\$1,199,505,303
28184-Alcohols	116,488	25%	346,656	75%	\$575,142,215
28123-Sodium Compounds, Exc. Sodium Alkalies	19,868	14%	123,637	86%	\$290,265,372
28128-Chlorine	2,716	7%	35,476	93%	\$217,942,768
28198-Anhydrous Ammonia	1,304	3%	37,304	97%	\$179,002,004
28125-Potassium Compounds, Exc. Potassium Alkalies	50,208	34%	98,496	66%	\$166,961,519
28181-Misc. Acyclic Organic Chemical, Exc. Organic Dyes	10,858	14%	67,914	86%	\$152,871,895
28186-Organic Acids or Salts, Exc. Acid Dyes	5,200	11%	42,696	89%	\$150,104,377
28185-Glycols or Glycerines	12,044	28%	31,188	72%	\$116,113,136
28122-Sodium Alkalies Sodium Compounds	8,920	14%	55,552	86%	\$110,854,504
28151-Cyclic Intermediates Benzene/Toluene/Other Cyclic Chemical Prod.	5,200	12%	38,796	88%	\$108,374,405
28713-Ammoniating Fertilizer Solution	11,332	17%	57,048	83%	\$98,808,890
28182-Misc. Acyclic Organic Chemical, Exc. Organic Dyes	1,640	7%	20,408	93%	\$97,705,775
28712-Super Phosphate	24,876	24%	77,699	76%	\$94,648,887
28193-Sulphuric Acid	19,636	25%	58,741	75%	\$93,060,805
28199-Industrial Inorganic Chemicals	3,616	12%	26,612	88%	\$71,669,002
28714-Misc. Fertilizer Compounds	7,452	22%	25,724	78%	\$71,411,755
28194-Industrial Inorganic Acids, Exc. Nitric	8,200	21%	30,920	79%	\$64,838,106
28996-Blacks	160	1%	15,320	99%	\$57,447,765
28139-Industrial Gases, (Compressed, Solid or Liquefied)	12,200	37%	20,960	63%	\$54,278,369
28999-Chemical Prod., Exc. Sealants	2,400	12%	18,220	88%	\$43,119,058
28183-Misc. Cyclic Chemical Prod.	5,080	26%	14,620	74%	\$37,730,442
28994-Fatty Acids	8,024	29%	19,868	71%	\$37,422,226

Cost of Non-Competitive Rates Details for Chemicals or Allied Products-STCC 28 (continued)

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
28189-Industrial Organic Chemicals, Exc. Grain Alcohol for Beverage	1,360	15%	7,440	85%	\$33,432,601
28141-Crude Prod. from Coal Tar/Natural Gas/Petroleum	1,996	14%	11,864	86%	\$28,738,949
28191-Ammonia/Ammonium Compounds, Exc. Anhydrous Ammonia	6,860	25%	20,240	75%	\$27,920,012
28998-Misc. Chemical Compounds, Exc. Sealants	1,640	13%	11,400	87%	\$27,129,762
28161-Titanium Pigments	600	12%	4,320	88%	\$26,091,495
28126-Barium/Calcium/Magnesium/Strontium Compounds Exc. Bleaches	2,160	11%	16,764	89%	\$25,179,850
28212-Synthetic Rubbers Vulcanizable Elastomers	1,564	16%	8,240	84%	\$24,802,558
28133-Carbon Dioxide	2,000	15%	11,280	85%	\$24,374,287
28197-Radio-Active or Nuclear Chemicals	0	0%	14,992	100%	\$23,525,429
28180-Misc. Acyclic Organic Chemical, Exc. Organic Dyes	1,400	20%	5,720	80%	\$19,987,450
28612-Gum/Wood Chemicals	3,000	32%	6,360	68%	\$17,637,415
28431-Surface Active or Agents, Sulfonated Oils or Assistants	1,040	11%	8,440	89%	\$14,637,409
28991-Salt, Common	15,000	56%	11,708	44%	\$13,812,997
28195-Cobalt/Copper/Iron/Nickel or Zinc Compounds	960	13%	6,440	87%	\$12,611,627
28124-Potassium Alkalies	400	5%	7,120	95%	\$12,531,579
28512-Paint Oils/Solvents/Thinners/Paint Drying Ingredients	80	4%	1,880	96%	\$9,679,323
28799-Agricultural Chemicals	440	11%	3,636	89%	\$9,206,634
28192-Nitric Acid	40	2%	2,580	98%	\$6,345,494
28121-Inorganic Bleaching Compounds, Exc. Chlorine	1,040	35%	1,920	65%	\$5,574,528
28997-Misc. Chemical Compounds, Exc. Sealants	480	22%	1,712	78%	\$5,010,751
28134-Elemental Gases	120	9%	1,200	91%	\$4,908,210
28152-Cyclic Intermediates Benzene/Toluene/Naphthalene/Other Cyclic Chemical Prod.	80	3%	2,320	97%	\$4,144,589
28419-Soap or Other Detergents, Exc. Shampoos or Shaving Prod.	200	13%	1,400	88%	\$3,444,507
28995-Water Treating Compounds	0	0%	280	100%	\$2,779,820
28188-Chemical Warfare Gases	0	0%	240	100%	\$2,570,374
28187-Misc. Acyclic Inorganic Prod., Exc. Organic Dyes	0	0%	800	100%	\$1,815,931
28169-Inorganic Pigments, Exc. Blacks or Organic Color Pigments	0	0%	320	100%	\$1,779,769
28196-Aluminum Compounds	360	26%	1,040	74%	\$1,634,463
28156-Organic Dyes	0	0%	320	100%	\$1,569,097
28931-Printing Ink	0	0%	240	100%	\$943,486
28163-Zinc Pigments	240	55%	200	45%	\$525,782
28519-Paints/Enamels/Lacquers/Shellacs/Varnishes	0	0%	80	100%	\$502,087
28190-Industrial Inorganic Chemicals	0	0%	240	100%	\$495,284

Cost of Non-Competitive Rates Details for Chemicals or Allied Products-STCC 28 (continued)

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
28911-Adhesives/Cements/Glues/Sizes/Calking Compounds/Sealants	0	0%	40	100%	\$164,988
28311-Drugs For Human Use	0	0%	80	100%	\$139,736
28921-Explosives, Exc. Ammunition	0	0%	80	100%	\$98,149
28719-Fertilizers, Exc. Milled, Mined or Otherwise Prepared Natural Boron	40	50%	40	50%	\$10,100
28422-Specialty Cleaning/Polishing/Sanitation Preparations/Household Bleaches	680	100%	0	0%	\$0
Total	532,754	23%	1,806,407	77%	\$4,485,035,101

Petroleum or Coal Products-STCC 29									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	\$4,059	137%	35,420	\$5,924	268%	39,744	\$1,865	130%	\$74,121,525
Northeast	\$2,192	146%	38,465	\$3,908	424%	128,295	\$1,716	277%	\$220,136,817
Southeast	\$2,318	139%	18,776	\$4,378	382%	35,924	\$2,060	243%	\$73,988,626
Upper Midwest	\$3,655	155%	32,208	\$5,301	283%	57,455	\$1,646	128%	\$94,578,302
Southwest	\$2,624	155%	35,320	\$3,711	313%	120,947	\$1,087	157%	\$131,465,846
Mountain Pacific	\$3,510	155%	32,108	\$4,422	285%	71,244	\$913	130%	\$65,044,659
Average	\$2,873	150%		\$4,327	338%		\$1,454	188%	
Total			192,297			453,609			\$659,335,776
Total US Only			156,877			413,865			\$585,214,251

Cost of Non-Competitive Rates Details for Petroleum or Coal Products-STCC 29					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
29121-Liquefied Gases, Coal or Petroleum	47,864	27%	130,884	73%	\$217,960,307
29913-Petroleum Coke	14,660	16%	76,886	84%	\$84,941,296
29116-Asphalt Pitches/Tars, from Petroleum/Coal Coke Oven/Natural Gas	21,328	28%	54,760	72%	\$84,579,681
29114-Petroleum Lubricating or Similar Oils, Compounds	17,520	33%	36,032	67%	\$80,085,504
29117-Petroleum Residual Fuel Oils/Other Low Volatile Petroleum Fuels	26,572	41%	37,504	59%	\$60,116,261
29914-Coke Produced from Coal	17,977	22%	62,731	78%	\$54,945,641
29119-Petroleum Refining Products	14,912	37%	25,636	63%	\$42,130,704
29912-Lubricants or Similar Compounds	1,240	19%	5,156	81%	\$12,551,491
29919-Coal or Petroleum Products	520	24%	1,636	76%	\$7,180,223
29111-Gasoline or Jet or High Volatile Petroleum Fuels	16,552	60%	10,936	40%	\$6,662,966
29113-Distillate Fuel Oil	6,444	43%	8,408	57%	\$5,203,704
29523-Asphalt Sheathings, Shingles or Sidings	5,628	67%	2,760	33%	\$2,883,549
29522-Asphalt/Tar Cements Coatings/Roofing Cements/ Pitches	0	0%	40	100%	\$56,723
29529-Asphalt Coatings or Felts	680	74%	240	26%	\$37,725
29112-Kerosene Exc. Jet Fuels	40	100%	0	0%	\$0
29521-Asphalt or Tar Saturated Felts, Boards or Roofing	360	100%	0	0%	\$0
Total	192,297	30%	453,609	70%	\$659,335,776

Clay, Concrete, Glass or Stone Products-STCC 32

	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		Premium
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	
Canada/Mexico	\$3,307	166%	3,968	\$4,964	255%	14,432	\$1,658	89%	\$23,926,383
Northeast	\$2,662	150%	20,293	\$3,973	328%	56,576	\$1,310	178%	\$74,140,890
Southeast	\$2,869	144%	27,484	\$5,549	302%	106,505	\$2,680	159%	\$285,484,407
Upper Midwest	\$2,546	163%	31,944	\$4,605	278%	49,600	\$2,059	115%	\$102,121,252
Southwest	\$1,923	178%	8,404	\$3,029	298%	55,992	\$1,106	120%	\$61,904,614
Mountain Pacific	\$2,747	172%	26,984	\$3,612	250%	66,572	\$865	78%	\$57,578,154
Average	\$2,633	159%		\$4,364	290%		\$1,731	131%	
Total			119,077			349,677			\$605,155,699
Total US Only			115,109			335,245			\$581,229,315

Cost of Non-Competitive Rates Details for Clay, Concrete, Glass or Stone Products-STCC 32

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
32952-Light Weight Aggregates/Clays or Slags/Ground Treated in Any Other Manner	31,360	27%	82,940	73%	\$255,937,760
32411-Hydraulic Cement, Natural, Portland or Masonry	32,276	19%	135,132	81%	\$145,818,433
32959-Nonmetallic Minerals or Earths, Ground or in Any Other Manner	26,392	28%	66,221	72%	\$123,405,303
32741-Lime or Lime Plaster	8,640	19%	37,296	81%	\$41,825,547
32754-Gypsum Wallboard	7,800	39%	12,200	61%	\$11,473,024
32299-Glass or Glassware, or Pressed	2,888	36%	5,128	64%	\$7,696,045
32715-Concrete Structural Shapes, Reinforced	0	0%	292	100%	\$2,992,489
32752-Gypsum Plaster	600	33%	1,240	67%	\$2,876,872
32954-Pyrophyllite, Steatite or Talc, Ground or Otherwise Treated	1,080	47%	1,200	53%	\$2,732,880
32759-Gypsum Products Exc. Gypsum Building	48	2%	2,728	98%	\$2,679,015
32719-Concrete Products	2,040	59%	1,400	41%	\$2,050,956
32511-Brick or Blocks, Clay or Shale	1,880	77%	560	23%	\$1,064,329
32956-Ground Uncalcined Gypsite or Anhydrite	2,373	71%	980	29%	\$790,806
32412-Ready-Mix Cement or Concrete, Dry	120	33%	240	67%	\$722,376
32531-Ceramic, Enamel, Promenade or Quarry or Wall Tile	360	38%	600	63%	\$656,725
32953-Magnesite or Magnesia/Calcined/Dead Burned/Ground	520	59%	360	41%	\$633,446
32113-Laminated or Safety	0	0%	80	100%	\$454,194

Cost of Non-Competitive Rates Details for Clay, Concrete, Glass or Stone Products-STCC 32 (continued)

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
32955-Feldspar, Ground or Otherwise Treated	120	25%	360	75%	\$430,700
32957-Mica, Ground or Treated	0	0%	160	100%	\$311,850
32552-Nonclay Refractories Dead Burned Magnesia or Magnesite	40	10%	360	90%	\$299,548
32911-Nonmetallic Artificial Abrasives, Flour Abrasives	40	25%	120	75%	\$158,603
32551-Clay Refractories	160	80%	40	20%	\$86,591
32958-Natural Graphite, Blended, Ground, Pulverized or Refined	0	0%	40	100%	\$58,209
32119-Flat Glass	40	100%	0	0%	\$0
32293-Glass Fibre	40	100%	0	0%	\$0
32711-Concrete Brick or Blocks	260	100%	0	0%	\$0
Total	119,077	25%	349,677	75%	\$605,155,699

Primary Metal Products, Including Galvanized Coating or Other Allied Processing-STCC 33									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		Premium
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	
Canada/Mexico	\$5,008	171%	15,196	\$7,680	291%	33,520	\$2,673	120%	\$89,582,543
Northeast	\$2,912	147%	109,287	\$4,090	295%	203,507	\$1,178	148%	\$239,773,006
Southeast	\$4,106	151%	38,784	\$6,256	272%	68,228	\$2,150	121%	\$146,673,464
Upper Midwest	\$3,995	164%	16,336	\$5,373	271%	36,568	\$1,378	107%	\$50,385,422
Southwest	\$4,378	169%	24,448	\$5,556	294%	39,968	\$1,179	125%	\$47,108,873
Mountain Pacific	\$4,344	149%	27,683	\$5,382	246%	22,578	\$1,039	97%	\$23,447,700
Average	\$3,610	153%		\$5,086	286%		\$1,476	132%	
Total			231,734			404,369			\$596,971,008
Total US Only			216,538			370,849			\$507,388,465

Cost of Non-Competitive Rates Details for Primary Metal Products, Including Galvanized Coating or Other Allied Processing-STCC 33					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
33123-Iron or Steel Sheet or Strip	95,932	34%	188,687	66%	\$192,723,438
33121-Steel Ingot or Semi-Finished Shapes	55,507	55%	45,428	45%	\$84,177,520
33122-Iron or Steel Plates	12,576	32%	27,152	68%	\$68,356,599
33126-Iron or Steel Pipe, or Fittings	14,413	24%	46,515	76%	\$64,142,999
33124-Iron or Steel Bars, Bar Shapes or Rods	11,436	28%	28,984	72%	\$50,276,329
33125-Structural Shapes or Piling, Steel Mill Products	7,236	26%	20,320	74%	\$39,656,958
33341-Primary Aluminum Blooms, Pig, Slab or Ingots	8,196	50%	8,348	50%	\$29,378,874
33128-Railway Track Material Viz. Rails/Joint Bars/Tie Plates/Related Prod.	1,752	19%	7,456	81%	\$14,553,456
33127-Tin Mill Products	680	12%	4,800	88%	\$7,116,070
33111-Pig Iron	5,390	46%	6,351	54%	\$7,013,074
33521-Aluminum or Aluminum Alloy Plate or Sheet	3,024	61%	1,920	39%	\$6,547,000
33311-Primary Copper or Copper Base Alloy Pig/Slab/Ingots	4,228	42%	5,856	58%	\$6,017,694
33321-Lead Pig, Slab, Ingots Bullion Exc. Solder, Bitt or Type Metal	1,720	54%	1,480	46%	\$4,460,109
33999-Primary Metal Products	1,320	45%	1,640	55%	\$4,040,694
33332-Zinc Dross, Residues, Ashes	40	4%	920	96%	\$3,298,660
33331-Zinc Smelter Products, Viz. Spelter/Pig Slab/Ingots	3,760	61%	2,360	39%	\$2,470,287
33991-Metal Powder, Flakes or Paste	0	0%	408	100%	\$1,955,780
33211-Iron or Steel Cast Pipe or Fittings	680	44%	880	56%	\$1,874,366
33523-Aluminum or Aluminum Alloy Rods or Bars	120	10%	1,140	90%	\$1,819,547
33155-Steel Wire Exc. Fabricated Wire Products	120	30%	280	70%	\$1,538,749
33135-Electrometallurgical Products	40	5%	796	95%	\$1,181,011

Cost of Non-Competitive Rates Details for Primary Metal Products, Including Galvanized Coating or Other Allied Processing-STCC 33 (continued)

Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
33151-Noninsulated Ferrous Rope, Cable or Strand	0	0%	160	100%	\$966,670
33119-Blast Furnace/Open Hearth/Rolling Mill/Coke Oven Prod.	592	39%	928	61%	\$877,417
33131-Ferromanganese	280	47%	320	53%	\$638,564
33112-Furnace Slag Exc. Ground or Otherwise Treated	1,876	84%	364	16%	\$549,882
33134-Additive Alloys Exc. Copper	280	70%	120	30%	\$309,695
33129-Primary Iron or Steel Products	80	25%	240	75%	\$301,481
33511-Copper/Brass/Bronze/Other Copper Base Alloy Rods/Bars	0	0%	160	100%	\$239,280
33219-Iron or Steel Castings	40	26%	116	74%	\$127,253
33133-Ferrosilicon	40	25%	120	75%	\$119,814
33911-Iron or Steel Forgings	0	0%	40	100%	\$98,644
33574-Wire or Cable, Enameled or Covered, All Types	0	0%	40	100%	\$82,528
33139-Ferroalloys	40	50%	40	50%	\$60,568
33152-Steel Nails/Staples/Tacks/Brads/Spikes Exc. Railway Spikes	80	100%	0	0%	\$0
33399-Primary Nonferrous Metal Ingots, Pig or Slab	40	100%	0	0%	\$0
33529-Aluminum/Aluminum Alloy Basic Shapes, /Exc. Alum Foil	216	100%	0	0%	\$0
Total	231,734	36%	404,369	64%	\$596,971,008

Transportation Equipment-STCC 37									
	Avg. Rate Below 180% RVC			Avg. Rate Above 180% RVC			Difference		
	Rate	RVC	Carloads	Rate	RVC	Carloads	Rate	RVC	Premium
Canada/Mexico	\$2,048	165%	54,116	\$3,008	261%	28,000	\$960	96%	\$26,873,104
Northeast	\$2,495	126%	417,359	\$4,416	251%	203,917	\$1,921	125%	\$391,715,716
Southeast	\$2,453	134%	162,350	\$4,505	300%	54,490	\$2,051	167%	\$111,775,344
Upper Midwest	\$3,413	137%	177,296	\$5,662	258%	141,327	\$2,249	121%	\$317,863,646
Southwest	\$2,809	138%	163,730	\$4,446	267%	135,080	\$1,637	129%	\$221,103,247
Mountain Pacific	\$4,360	127%	59,012	\$7,078	268%	50,326	\$2,718	141%	\$136,789,307
Average	\$2,905	133%		\$4,872	262%		\$1,967	129%	
Total			1,033,863			613,140			\$1,206,120,365
Total US Only			979,747			585,140			\$1,179,247,261

Cost of Non-Competitive Rates Details for Transportation Equipment-STCC 37					
Commodity STCC	Carloads Below 180% RVC	Percent of Total Carloads	Carloads Above 180% RVC	Percent of Total Carloads	Premium
37111-Motor Passenger or Air Cars, Assembled	571,144	65%	308,240	35%	\$616,419,831
37112-Motor Trucks or Truck Tractors, Assembled	288,920	67%	142,640	33%	\$284,673,506
37149-Motor Vehicle or Parts, NEC, Including Mixed Loads	26,280	30%	60,040	70%	\$190,959,122
37143-Motor Vehicle Frames	80	0%	20,400	100%	\$47,415,646
37422-Freight Train Cars	129,959	64%	72,580	36%	\$34,299,088
37299-Aircraft Parts, NEC, or Auxiliary Equipment	80	4%	2,108	96%	\$16,665,864
37144-Motor Car Internal Combustion Engines or Parts	1,680	42%	2,360	58%	\$6,169,495
37119-Motor Vehicles, NEC, or Golf Carts	2,920	76%	920	24%	\$2,657,917
37426-Railroad Car Wheels Parts or Accessories for Railroad or Street Cars	2,040	48%	2,236	52%	\$1,457,791
37411-Locomotives or Tenders	0	0%	80	100%	\$1,433,116
37428-Parts or Accessories for Railroad or Street Cars Exc. Wheels	200	30%	456	70%	\$1,303,276
37142-Motor Vehicle	0	0%	120	100%	\$661,632
37421-Passenger Train Cars	0	0%	436	100%	\$646,891
37114-Motor Combat Vehicles	0	0%	124	100%	\$516,322
37423-Street Cars or Self-Propelled Railroad Cars	0	0%	80	100%	\$380,301
37147-Motor Vehicle Body Parts	10,480	99%	120	1%	\$163,734
37999-Transportation Parts or Accessories	0	0%	40	100%	\$120,921
37691-Guided Missile or Space Vehicle Parts or Auxiliary Equipment	40	33%	80	67%	\$117,352
37413-Parts For Locomotives, All Types	40	50%	40	50%	\$49,121
37151-Truck Trailers	0	0%	40	100%	\$9,441
Total	1,033,863	63%	613,140	37%	\$1,206,120,365