

in addition to any commutation riders. The Penn-Central's 150 intercity trains would be carrying 31 million non-commutation passengers for an approximate daily load factor of 565 plus commutation passengers. Both non-commutation load factors are extremely high.¹⁸

The average length of trip for non-commutation passengers in the East was only 50.8 miles in 1967, compared to 260.1 miles in the South and 396.2 miles in the West. This comparison further corroborates the conclusion that the majority of the 78 million non-commutation passengers in the East probably ride commuter and suburban trains. In fact, the average length of non-commuter trip is less than the average commuter trip for the Boston & Maine and the Long Island.

A similar level of distortion is not indicated for the western and southern districts. There the reported commutation passengers for the six major commuter railroads range from 78.1 to 96.7 percent of their total passengers.¹⁹ Moreover, the estimated load factors for intercity trains (the total non-commutation passengers divided by number of intercity trains) are generally

18 New York, N. H. & H. R. Co. -Discontinuance of Trains, 327 I. C. C. 151 (1966).

19 Chicago and North Western, 96.7 percent; Illinois Central, 84.1 percent; Chicago, Milwaukee, St. Paul and Pacific, 81.5 percent; Chicago, Burlington and Quincy, 85.4 percent; Chicago, Rock Island & Pacific, 91.1 percent; and the Southern Pacific, 78.1 percent.