1 Massachusetts Avenue, NW, Washington, DC 20001 Email william.flynn@amtrak.com Tel 202-906-3963



June 1, 2021

The Honorable Pete Buttigieg U.S. Secretary of Transportation 1200 New Jersey Ave, SE Washington, DC 20590

Dear Secretary Buttigieg,

The Metrics and Minimum Standards for Intercity Passenger Rail Service final rule set forth at 49 C.F.R. Part 273 and published by the Federal Railroad Administration ("FRA") on November 16, 2020 (the "Final Rule"), introduces a certified schedule metric that requires Amtrak to report to the FRA the number of certified Amtrak schedules, uncertified schedules, and disputed schedules, by train, route, and host railroad.

The Final Rule defines a "certified schedule" as a published Amtrak train schedule that Amtrak and the host railroad jointly certify is aligned with the customer on-time performance ("OTP") metric and standard set forth in the Final Rule. The customer OTP metric is the percentage of all customers who arrive at their detraining point no later than fifteen (15) minutes after their published scheduled arrival time, reported by train and by route, and the customer OTP standard is eighty (80) percent for any two consecutive calendar quarters. See 49 C.F.R. 273.5(a)(1) & (2).

As required by the Final Rule, Amtrak and Metro-North Commuter Railroad Company (MNRR) are transmitting this joint letter reporting the following schedules that remain uncertified as of May 17, 2021, as agreement has not been reached on whether the schedules are aligned with the customer OTP metric and standard:

- 1. Acela Trains 2150, 2151, 2153, 2154, 2155, 2159, 2160, 2163, 2164, 2165, 2167, 2168, 2170, 2171, 2172, 2173, 2175, 2190, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2275 and 2290
- 2. Adirondack Trains 68 and 69
- 3. Ethan Allen Express Trains 290, 291, 292, 293, 295 and 296
- 4. Maple Leaf Trains 63 and 64
- 5. New York Albany Trains 230, 232, 233, 234, 235, 236, 237, 238, 241, 242, 243, 244, 245, 250, 252, 253, 254, 255, 256, 259, 260 and 261
- 6. New York Niagara Falls Trains 280, 281, 283, 284 and 288
- 7. Northeast Regional Trains 132, 135, 136, 137, 139, 140, 141, 143, 146, 148, 149, 150, 161, 162, 163, 166, 167, 168, 169, 170, 172, 173, 175, 177, 178, 179, 190
- 8. Richmond/Newport News/Norfolk Trains 65, 66, 67, 82, 86, 95, 96, 157, 174 and 194



- 9. Roanoke Trains 171 and 176
- 10. Vermonter Trains 54, 55, 56 and 57.

Exhibit A details Amtrak's position regarding the components of the train schedules upon which Amtrak and Metro-North have not yet agreed, signed by me.

Exhibit B details MNRR's position regarding the components of the train schedules upon which the parties have not yet agreed, signed by MNRR President Catherine Rinaldi.

Amtrak and MNRR continue to meet regularly and hope to come to an agreement on the certification of all schedules. Please let us know if you have any questions regarding the information provided in this transmittal.

Sincerely,

William J. Flynn

Chief Executive Officer

## Attachments

cc: The Honorable Martin J. Oberman, Chairman, Surface Transportation Board

The Honorable Peter A. DeFazio, Chair, Committee on Transportation and Infrastructure, U.S. House of Representatives

The Honorable Sam Graves, Ranking Member, Committee on Transportation and Infrastructure, U.S. House of Representatives

The Honorable Maria Cantwell, Chair, Committee on Commerce, Science, and Transportation, U.S. Senate

The Honorable Roger Wicker, Ranking Member, Committee on Commerce, Science, and Transportation, U.S. Senate

The Honorable Rosa L. DeLauro, Chair, Committee on Appropriations, U.S. House of Representatives

The Honorable Kay Granger, Ranking Member, Committee on Appropriations, U.S. House of Representatives

The Honorable Patrick Leahy, Chair, Committee on Appropriations, U.S. Senate

The Honorable Richard Shelby, Ranking Member, Committee on Appropriations, U.S. Senate

The Honorable Don Beyer, U.S. House of Representatives

The Honorable Richard Blumenthal, U.S. Senate

The Honorable Cory Booker, U.S. Senate

The Honorable Jamaal Bowman, U.S. House of Representatives



The Honorable Brendan Boyle, U.S. House of Representatives

The Honorable Anthony Brown, U.S. House of Representatives

The Honorable Ben Cardin, U.S. Senate

The Honorable Tom Carper, U.S. Senate

The Honorable Bob Casey, U.S. Senate

The Honorable David Cicilline, U.S. House of Representatives

The Honorable Yvette Clark, U.S. House of Representatives

The Honorable Ben Cline, U.S. House of Representatives

The Honorable Gerry Connolly, U.S. House of Representatives

The Honorable Chris Coons, U.S. Senate

The Honorable Joe Courtney, U.S. House of Representatives

The Honorable Madeleine Dean, U.S. House of Representatives

The Honorable Antonio Delgado, U.S. House of Representatives

The Honorable Adriano Espaillat, U.S. House of Representatives

The Honorable Dwight Evans, U.S. House of Representatives

The Honorable Brian Fitzpatrick, U.S. House of Representatives

The Honorable Kirsten Gillibrand, U.S. Senate

The Honorable Bob Good, U.S. House of Representatives

The Honorable Morgan Griffith, U.S. House of Representatives

The Honorable Andy Harris, U.S. House of Representatives

The Honorable Maggie Hassan, U.S. Senate

The Honorable Jahana Hayes, U.S. House of Representatives

The Honorable Brian Higgins, U.S. House of Representatives

The Honorable Jim Himes, U.S. House of Representatives

The Honorable Steny Hoyer, U.S. House of Representatives

The Honorable Chris Jacobs, U.S. House of Representatives

The Honorable Hakeem Jeffries, U.S. House of Representatives

The Honorable Mondaire Jones, U.S. House of Representatives

The Honorable Tim Kaine, U.S. Senate

The Honorable John Katko, U.S. House of Representatives

The Honorable Ann McLane Kuster, U.S. House of Representatives

The Honorable Jim Langevin, U.S. House of Representatives

The Honorable John Larson, U.S. House of Representatives

The Honorable Elaine Luria, U.S. House of Representatives

The Honorable Stephen Lynch, U.S. House of Representatives

The Honorable Nicole Malliotakis, U.S. House of Representatives

The Honorable Carolyn Maloney, U.S. House of Representatives

The Honorable Sean Patrick Maloney, U.S. House of Representatives

The Honorable Ed Markey, U.S. Senate

The Honorable Donald McEachin, U.S. House of Representatives

The Honorable James McGovern, U.S. House of Representatives

The Honorable Gregory W. Meeks, U.S. House of Representatives

The Honorable Bob Menendez, U.S. Senate

The Honorable Grace Meng, U.S. House of Representatives

The Honorable Kweisi Mfume, U.S. House of Representatives

The Honorable Joseph Morelle, U.S. House of Representatives

The Honorable Chris Murphy, U.S. Senate

The Honorable Jerrold Nadler, U.S. House of Representatives

The Honorable Richard Neal, U.S. House of Representatives

The Honorable Donald Norcross, U.S. House of Representatives

The Honorable Eleanor Holmes Norton, U.S. House of Representatives

The Honorable Alexandria Ocasio-Cortez, U.S. House of Representatives

The Honorable Frank Pallone, Jr., U.S. House of Representatives

The Honorable Donald M. Payne, Jr., U.S. House of Representatives

The Honorable Ayanna Pressley, U.S. House of Representatives

The Honorable Jamie Raskin, U.S. House of Representatives

The Honorable Jack Reed, U.S. Senate

The Honorable Kathleen Rice, U.S. House of Representatives

The Honorable Lisa Blunt Rochester, U.S. House of Representatives

The Honorable C. A. Dutch Ruppersberger, U.S. House of Representatives

The Honorable Bernie Sanders, U.S. Senate

The Honorable John P. Sarbanes, U.S. House of Representatives

The Honorable Mary Gay Scanlon, U.S. House of Representatives

The Honorable Chuck Schumer, U.S. Senate

The Honorable Bobby Scott, U.S. House of Representatives

The Honorable Jeanne Shaheen, U.S. Senate

The Honorable Albio Sires, U.S. House of Representatives

The Honorable Christopher H. Smith, U.S. House of Representatives

The Honorable Abigail Spanberger, U.S. House of Representatives

The Honorable Elise Stefanik, U.S. House of Representatives

The Honorable Thomas Suozzi, U.S. House of Representatives

The Honorable Claudia Tenney, U.S. House of Representatives

The Honorable Paul Tonko, U.S. House of Representatives

The Honorable Pat Toomey, U.S. Senate

The Honorable Ritchie Torres, U.S. House of Representatives

The Honorable Chris Van Hollen, U.S. Senate

The Honorable Nydia Velazquez, U.S. House of Representatives

The Honorable Mark Warner, U.S. Senate

The Honorable Elizabeth Warren, U.S. Senate

The Honorable Bonnie Watson Coleman, U.S. House of Representatives

The Honorable Peter Welch, U.S. House of Representatives

The Honorable Jennifer Wexton, U.S. House of Representatives

The Honorable Pete Buttigieg June 1, 2021 Page 5



The Honorable Sheldon Whitehouse, U.S. Senate The Honorable Rob Wittman, U.S. House of Representatives

## Exhibit A

Amtrak's position regarding the disagreed upon components of the train schedules.

The Final Rule defines a "certified schedule" as a published train schedule that Amtrak and the host railroad jointly certify is aligned with the customer on-time performance ("OTP") metric and standard set forth in the Final Rule. In order to determine whether a train schedule is aligned with the customer OTP metric, Amtrak developed an analytical framework to review each schedule and its alignment with the customer OTP metric. Fundamentally, the analytical framework confirms whether the schedule works to minimize passenger delay while giving riders the greatest opportunity to arrive at their destinations on-time. Several criteria, listed below, were rigorously analyzed to determine whether the schedule was appropriately aligned to the customer OTP metric.

- 1. **Prior Customer OTP Schedule Modifications.** If Amtrak and the host railroad previously agreed to modify the schedule to align with customer OTP, and no significant changes in passenger deboarding patterns were evident since that agreement, that schedule was determined to be aligned with the customer OTP metric.
- 2. **Strong Historical Performance.** While certification directly relates to the schedule, not actual performance, if a train has regularly exceeded the minimum standard 80% customer OTP, that schedule was deemed to be aligned with the customer OTP metric.
- 3. **Recovery Time-Ridership Correlation.** Amtrak performed a regression analysis for each schedule to calculate the correlation between the placement of recovery time in the schedule and the number of detraining riders at each station. If the regression result was strong (0.5 or more), the train schedule was determined to be aligned with the customer OTP metric.
- 4. **Recovery Time Distributed to Passenger Benefit.** Amtrak developed a measurement of the schedule's recovery time distribution to determine whether that time is effectively placed to help passengers. If the recovery time is placed in advance of detraining passengers to help them arrive on-time, then, based on a consistent calculation for all trains, the schedule was determined to be aligned with the customer OTP metric.

These criteria which Amtrak used as the basis to certify schedules were included in our December 18, 2020 schedule certification proposal to Metro-North Commuter Railroad (MNRR). Several meetings were held with MNRR staff since that time to further explain the basis for our proposal to certify the schedules. This Exhibit A, which also includes these criteria, was provided to MNRR on May 6, 2021.

Table 1 lists each uncertified train schedule by service and notes which criteria were met for each schedule that led to Amtrak's determination that the schedule is aligned with customer OTP. Amtrak looks forward to continuing to work with MNRR to certify the following schedules.

Sincerely,

William J. Flynn

Chief Executive Officer

Amtrak

Table 1: Amt	trak Sched	lule Alignment Analysi	s Results by Train				
Service	Train	Train Origin- Destination	1. Prior Customer OTP Schedule Modifications	2. Strong Historical Performance	3. Recovery Time- Ridership Correlation	4. Recovery Time Distributed to Passenger Benefit	Assessment based on Criteria
Acela	2150	Washington-Boston	√	V		√ V	Aligned to Customer OTP
Acela	2151	Boston-Washington	√	V	√	V	Aligned to Customer OTP
Acela	2153	Boston-Washington	√	$\sqrt{}$		V	Aligned to Customer OTP
Acela	2154	Washington-Boston	√	V		V	Aligned to Customer OTP
Acela	2155	Boston-Washington	√	V	√	V	Aligned to Customer OTP
Acela	2159	Boston-Washington	√	$\sqrt{}$	V	V	Aligned to Customer OTP
Acela	2160	Washington-Boston	$\sqrt{}$	$\sqrt{}$			Aligned to Customer OTP
Acela	2163	Boston-Washington	√	$\sqrt{}$		V	Aligned to Customer OTP
Acela	2164	Washington-Boston	√	V		V	Aligned to Customer OTP
Acela	2165	Boston-Washington	$\sqrt{}$	$\sqrt{}$		V	Aligned to Customer OTP
Acela	2167	Boston-Washington	V	$\sqrt{}$		V	Aligned to Customer OTP
Acela	2168	Washington-Boston	V	$\sqrt{}$			Aligned to Customer OTP
Acela	2170	Washington-Boston	V	$\sqrt{}$			Aligned to Customer OTP
Acela	2171	Boston-Washington	√	V	√	V	Aligned to Customer OTP
Acela	2172	Washington-Boston	V	V			Aligned to Customer OTP
Acela	2173	Boston-Washington	√	V	√	V	Aligned to Customer OTP
Acela	2175	Boston-Washington	V	V	V		Aligned to Customer OTP
Acela	2190	New York-Boston	√	V		V	Aligned to Customer OTP
Acela	2249	Boston-Washington	√	V	√	V	Aligned to Customer OTP
Acela	2250	Washington-Boston	√	V		V	Aligned to Customer OTP
Acela	2251	Boston-Washington	√	V	√	V	Aligned to Customer OTP
Acela	2252	Washington-Boston	√	V			Aligned to Customer OTP
Acela	2253	Boston-Washington	√	V	V	V	Aligned to Customer OTP
Acela	2254	Washington-Boston	√	V			Aligned to Customer OTP
Acela	2255	Boston-Washington	√	V	V	V	Aligned to Customer OTP
Acela	2256	Washington-Boston	√	V		V	Aligned to Customer OTP
Acela	2257	Boston-Washington	√	V	V	V	Aligned to Customer OTP
Acela	2258	Washington-Boston	√				Aligned to Customer OTP
Acela	2259	Boston-Washington	√	V	V	V	Aligned to Customer OTP
Acela	2260	Washington-Boston	√	V		V	Aligned to Customer OTP
Acela	2261	Boston-Washington	√	V		V	Aligned to Customer OTP
Acela	2275	Boston-Washington	√	V	√	V	Aligned to Customer OTP
Acela	2290	New York-Boston	√	V		V	Aligned to Customer OTP
Adirondack	68	New York-Montreal	√		V	V	Aligned to Customer OTP

Adirondack	69	New York-Montreal	V	V		V	Aligned to Customer OTP
Ethan Allen	290	New York-Rutland	V	$\sqrt{}$	V	V	Aligned to Customer OTP
Express							
Ethan Allen	291	New York-Rutland	V	$\sqrt{}$			Aligned to Customer OTP
Express							
Ethan Allen	292	New York-Rutland	V	V		V	Aligned to Customer OTP
Express							
Ethan Allen	293	New York-Rutland	V	$\sqrt{}$		V	Aligned to Customer OTP
Express							
Ethan Allen	295	New York-Rutland	V				Aligned to Customer OTP
Express							
Ethan Allen	296	New York-Rutland	V	$\sqrt{}$	V	V	Aligned to Customer OTP
Express							
Maple Leaf	63	New York-Toronto	V			V	Aligned to Customer OTP
Maple Leaf	64	New York-Toronto	V			V	Aligned to Customer OTP
New York -	230	New York-Albany	V		V	V	Aligned to Customer OTP
Albany							
New York -	232	New York-Albany	V		V	V	Aligned to Customer OTP
Albany							
New York -	233	New York-Albany	V		V		Aligned to Customer OTP
Albany							
New York -	234	New York-Albany	V		V	V	Aligned to Customer OTP
Albany							
New York -	235	New York-Albany	V		V		Aligned to Customer OTP
Albany							
New York -	236	New York-Albany	V		V	V	Aligned to Customer OTP
Albany							
New York -	237	New York-Albany	V		V	V	Aligned to Customer OTP
Albany							
New York -	238	New York-Albany	V		V	V	Aligned to Customer OTP
Albany							
New York -	241	New York-Albany	V		V		Aligned to Customer OTP
Albany							
New York -	242	New York-Albany	V		V	V	Aligned to Customer OTP
Albany							
New York -	243	New York-Albany	V		V	√	Aligned to Customer OTP
Albany							
New York -	244	New York-Albany	V		V	√	Aligned to Customer OTP
Albany							

New York -	245	New York-Albany	V	V	√ V		Aligned to Customer OTP
Albany							
New York - Albany	250	New York-Albany	$\sqrt{}$	$\sqrt{}$	√ 	$\sqrt{}$	Aligned to Customer OTP
New York - Albany	252	New York-Albany	V	V	V	V	Aligned to Customer OTP
New York - Albany	253	New York-Albany	V	V	V	V	Aligned to Customer OTP
New York - Albany	254	New York-Albany	V	$\sqrt{}$	V	V	Aligned to Customer OTP
New York - Albany	255	New York-Albany	V	V	V		Aligned to Customer OTP
New York - Albany	256	New York-Albany	V	V	V	V	Aligned to Customer OTP
New York - Albany	259	New York-Albany	V	V	V	V	Aligned to Customer OTP
New York - Albany	260	New York-Albany	V	V	V	V	Aligned to Customer OTP
New York - Albany	261	New York-Albany	V	V	V	V	Aligned to Customer OTP
New York - Niagara Falls	280	New York-Niagara Falls	V	V	V	V	Aligned to Customer OTP
New York - Niagara Falls	281	New York-Niagara Falls	V				Aligned to Customer OTP
New York - Niagara Falls	283	New York-Niagara Falls	V				Aligned to Customer OTP
New York - Niagara Falls	284	New York-Niagara Falls	V	V	V	V	Aligned to Customer OTP
New York - Niagara Falls	288	New York-Niagara Falls	V	V	V	V	Aligned to Customer OTP
Northeast Regional	132	Washington-Boston	V	$\sqrt{}$			Aligned to Customer OTP
Northeast Regional	135	Boston-Washington	V	V	V	V	Aligned to Customer OTP

Northeast Regional	136	Washington- Springfield	V				Aligned to Customer OTP
Northeast	137	Boston-Washington	V	$\sqrt{}$	V	V	Aligned to Customer OTP
Regional							
Northeast	139	Boston-Washington	V	$\sqrt{}$	V	V	Aligned to Customer OTP
Regional							
Northeast	140	Washington-	V	$\sqrt{}$			Aligned to Customer OTP
Regional		Springfield					
Northeast	141	Springfield-	V	$\sqrt{}$	V	V	Aligned to Customer OTP
Regional		Washington					
Northeast	143	Springfield-	V	$\sqrt{}$	V	V	Aligned to Customer OTP
Regional		Washington					
Northeast	146	Washington-	$\sqrt{}$				Aligned to Customer OTP
Regional		Springfield					
Northeast	148	Washington-	$\sqrt{}$	V			Aligned to Customer OTP
Regional		Springfield					
Northeast	149	Boston-Washington	$\sqrt{}$	V	V	V	Aligned to Customer OTP
Regional							
Northeast	150	Washington-Boston	V	$\sqrt{}$		V	Aligned to Customer OTP
Regional							
Northeast	161	Boston-Washington	V	$\sqrt{}$	V	V	Aligned to Customer OTP
Regional							
Northeast	162	Washington-Boston	V	$\sqrt{}$		V	Aligned to Customer OTP
Regional							
Northeast	163	Boston-Washington	$\sqrt{}$		V	V	Aligned to Customer OTP
Regional							
Northeast	166	Washington-Boston	V	$\sqrt{}$		V	Aligned to Customer OTP
Regional							
Northeast	167	Boston-Washington	V	$\sqrt{}$	V	V	Aligned to Customer OTP
Regional							
Northeast	168	Washington-Boston	$\sqrt{}$	$\sqrt{}$			Aligned to Customer OTP
Regional							
Northeast	169	Boston-Washington	V	$\sqrt{}$	V		Aligned to Customer OTP
Regional							
Northeast	170	Washington-Boston	$\sqrt{}$	$\sqrt{}$		$\sqrt{}$	Aligned to Customer OTP
Regional							
Northeast	172	Washington-Boston	$\sqrt{}$	$\sqrt{}$			Aligned to Customer OTP
Regional							
Northeast	173	Boston-Washington	$\sqrt{}$	$\sqrt{}$	V	$\sqrt{}$	Aligned to Customer OTP
Regional							

Northeast Regional	175	Boston-Washington	V	V	V	V	Aligned to Customer OTP
Northeast Regional	177	Boston-Washington	V	$\sqrt{}$			Aligned to Customer OTP
Northeast Regional	178	Washington-Boston	V	V			Aligned to Customer OTP
Northeast Regional	179	Boston-New York	V	V	V		Aligned to Customer OTP
Northeast Regional	190	Washington-Boston	V	V		V	Aligned to Customer OTP
Richmond / Newport News / Norfolk	65	Boston-Newport News	V	V	V		Aligned to Customer OTP
Richmond / Newport News / Norfolk	66	Newport News- Boston	V	V		V	Aligned to Customer OTP
Richmond / Newport News / Norfolk	67	Boston-Newport News	V	$\sqrt{}$	V		Aligned to Customer OTP
Richmond / Newport News / Norfolk	82	Richmond-Boston	V	V		V	Aligned to Customer OTP
Richmond / Newport News / Norfolk	86	Richmond-Boston	V	$\sqrt{}$	V	V	Aligned to Customer OTP
Richmond / Newport News / Norfolk	95	Boston-Norfolk	V	V		V	Aligned to Customer OTP
Richmond / Newport News / Norfolk	96	Newport News- Boston	V	V		V	Aligned to Customer OTP
Richmond / Newport	157	Springfield-Norfolk	V	V	V	V	Aligned to Customer OTP

News /							
Norfolk							
Richmond /	174	Newport News-	V	$\sqrt{}$		$\sqrt{}$	Aligned to Customer OTP
Newport		Boston					
News /							
Norfolk							
Richmond /	194	Newport News-	V	$\sqrt{}$		$\sqrt{}$	Aligned to Customer OTP
Newport		Boston					
News /							
Norfolk							
Roanoke	171	Boston-Roanoke	V	$\sqrt{}$	V	$\sqrt{}$	Aligned to Customer OTP
Roanoke	176	Roanoke-Boston	$\sqrt{}$	$\sqrt{}$			Aligned to Customer OTP
Vermonter	54	Washington DC-St.	V			$\sqrt{}$	Aligned to Customer OTP
		Albans					
Vermonter	55	Washington DC-St.	V	V	√	$\sqrt{}$	Aligned to Customer OTP
		Albans					
Vermonter	56	Washington DC-St.	$\sqrt{}$	V		$\sqrt{}$	Aligned to Customer OTP
		Albans					
Vermonter	57	Washington DC-St.	V	V	√	$\sqrt{}$	Aligned to Customer OTP
		Albans					

## **Exhibit B**

Metro-North Commuter Railroad Company's ("Metro-North") position on the disagreed-upon components of Amtrak's train schedules.

Metro-North, a New York State public benefit corporation and subsidiary of the Metropolitan Transportation Authority ("MTA"), operates the second-busiest commuter railroad in the country. Pre-COVID, Metro-North operated 713 weekday revenue trains carrying an average of 289,000 weekday riders. Pursuant to certain Trackage Rights Agreements between Metro-North and Amtrak, Amtrak operates over Metro-North's New Haven and Hudson Lines (Metro-North's "territory"). Amtrak enters Metro-North's New Haven Line territory in New Haven, CT and leaves the New Haven Line in New Rochelle, NY, continuing on to Penn Station in midtown Manhattan. Amtrak enters Metro-North's Hudson Line territory in Poughkeepsie, NY and exits near Riverdale in the Bronx, NY, again continuing on to Penn Station.

The Metrics and Minimum Standards for Intercity Passenger Rail Service, 49 C.F.R. Part 273, published by the Federal Railroad Administration ("FRA") on November 16, 2020 (the "Final Rule") defines a "certified schedule" as a published train schedule for Amtrak trains that Amtrak and the host railroad jointly certify is aligned with the Customer On-Time Performance ("OTP") metric and standard set forth in the Final Rule. To ensure Amtrak's train schedules meet the Customer OTP metric and standard, Metro-North needs to confirm that Amtrak trains have the necessary running time to traverse Metro-North's territory without incurring delays. Amtrak's trains traverse long distances; Metro-North has no control over events outside of its territory and must account for such unknowns in its review and certification of Amtrak's schedules.

All of the schedules Amtrak has asked Metro-North to certify were set prior to the COVID-19 pandemic, and several of these pre-COVID trains have not been operating through the pandemic. Additionally, many schedules Amtrak has requested Metro-North to certify have not been provided by Amtrak to Metro-North for review. It is Metro-North's position that certifying schedules (1) for Amtrak trains that have not been operating for over a year and/or (2) have not been reviewed or adjusted to account for pre and post-COVID-19 realities and ridership changes is premature.

Amtrak has not provided Metro-North with information about how it developed its framework to review each schedule and its alignment with the Customer OTP metric. As such, Metro-North used the framework outlined below to analyze Amtrak's schedules to determine whether the Amtrak schedules meet the Customer OTP metric and standard and can be certified.

- 1. Does the Amtrak train currently operate? Due to COVID-19, in Spring 2020 Amtrak reduced the number of trains operating on Metro-North's territory. Amtrak has returned a few trains to service, but many pre-COVID trains remain suspended. Metro-North is unaware of Amtrak's plans to resume suspended services.
- 2. Does Metro-North have a schedule for this Amtrak train? Train schedules provided to Metro-North of currently operating trains since May 2020 have been reviewed for certification. Train schedules not provided to Metro-North or that have been suspended since May 2020 were not analyzed for certification as Metro-North has no schedule to reference.

- 3. What actions has Metro-North taken? Metro-North has either analyzed schedules that Amtrak has provided to determine whether they can be certified, or Metro-North is awaiting a schedule proposal from Amtrak to review for certification.
- 4. What is the definition of Metro-North's calculated running time for Amtrak trains on Metro-North territory? This is Metro-North's calculated schedule of pure running time, station stops, acceleration, braking, diverting movements and recovery time for Amtrak trains on Metro-North territory in order for the schedule to be reliable and certifiable.
- 5. What is the definition of Amtrak's current running time? This is the current Amtrak schedule for the Amtrak train on Metro-North's territory.
- 6. What is the definition of running-time deficiency? This is the delta between Metro-North's calculated running times and the current Amtrak schedule.

The attached Table 1 lists each Amtrak train that Metro-North has not certified to date based on the framework and analysis identified above. The columns for Table 1 conform to the above steps.

Metro-North is committed to working with Amtrak to certify its schedules and ensure its customers have the best possible ridership experience, and looks forward to working with Amtrak to resolve these differences. Metro-North proposes that the parties meet in June 2021, prior to the due date for the next letter.

Rual de

Very truly yours,

Catherine A. Rinaldi President, Metro-North

Train	(1) Train is Currently Operating as of May 2021	(2) Schedule Provided to Metro-North between May 2020 and May 2021	(3) Metro-North Action Taken	(4) MNR-Calculated Running Time (Minutes)	(5) Current Amtrak Running Time (Minutes)	(6) Running Time Deficiency
2150	Yes	Yes	Review for Certification	73	70	3
2151	No	No	Waiting for Schedule			
2153	No	No	Waiting for Schedule			
2154	Yes	Yes	Review for Certification	75	68	7
2155	Yes	Yes	Review for Certification	73	68	5
2159	Yes	Yes	Review for Certification	73	69	4
2160	No	No	Waiting for Schedule			
2163	Yes	Yes	Review for Certification	73	70	3
2164	No	No	Waiting for Schedule			
2165	No	No	Waiting for Schedule			
2167	No	Yes	Waiting for Schedule			
2168	No	Yes	Waiting for Schedule			
2169	Yes	Yes	Review for Certification	73	72	1
2170	Yes	Yes	Review for Certification	73	67	6
2171	No	No	Waiting for Schedule			
2172	No	No	Waiting for Schedule			
2173	Yes	Yes	Review for Certification	73	72	1
2175	No	No	Waiting for Schedule			
2190	No	No	Waiting for Schedule			
2249	Yes	Yes	Review for Certification	73	71	2
2250	Yes	Yes	Review for Certification	73	71	2
2251	Yes	Yes	Review for Certification	75	73	2
2252	Yes	Yes	Review for Certification	73	72	1
2253	Yes	Yes	Review for Certification	75	72	3
2254	Yes	Yes	Review for Certification	73	70	3
2255	Yes	Yes	Review for Certification	73	72	1
2256	Yes	Yes	Review for Certification	73	72	1
2257	Yes	Yes	Review for Certification	73	72	1
2258	No	No	Waiting for Schedule			
2259	Yes	Yes	Review for Certification	75	71	4
2260	No	No	Waiting for Schedule			
2261	No	Yes	Waiting for Schedule			

Train	(1) Train is Currently Operating as of May 2021	(2) Schedule Provided to Metro-North between May 2020 and May 2021	(3) Metro-North Action Taken	(4) MNR-Calculated Running Time (Minutes)	(5) Current Amtrak Running Time (Minutes)	(6) Running Time Deficiency
2275	No	No	Waiting for Schedule			
2290	No	No	Waiting for Schedule			
68	No	No	Waiting for Schedule			
69	No	No	Waiting for Schedule			
290	Yes	Yes	Review for Certification	75	70	5
291	Yes	Yes	Review for Certification	75	70	5
292	Yes	Yes	Review for Certification	75	70	5

Train	(1) Train is Currently Operating as of May 2021	(2) Schedule Provided to Metro-North between May 2020 and May 2021	(3) Metro-North Action Taken	(4) MNR-Calculated Running Time (Minutes)	(5) Current Amtrak Running Time (Minutes)	(6) Running Time Deficiency
293	No	No	Waiting for Schedule			
295	No	No	Waiting for Schedule			
296	No	No	Waiting for Schedule			
63	Yes	Yes	Review for Certification	75	70	5
64	Yes	Yes	Review for Certification	75	71	4
230	No	No	Waiting for Schedule			
232	Yes	Yes	Review for Certification	73	70	3
233	Yes	Yes	Review for Certification	75	70	5
234	Yes	Yes	Review for Certification	73	68	5
235	No	No	Waiting for Schedule			
236	Yes	Yes	Review for Certification	75	70	5
237	Yes	Yes	Review for Certification	73	67	6
238	Yes	Yes	Review for Certification	75	70	5
241	Yes	Yes	Review for Certification	75	70	5
242	No	No	Waiting for Schedule			
243	Yes	Yes	Review for Certification	75	70	5
244	Yes	Yes	Review for Certification	73	68	5
245	No	No	Waiting for Schedule			
250	Yes	Yes	Review for Certification	75	70	5
252	No	No	Waiting for Schedule			
253	Yes	Yes	Review for Certification	75	70	5
254	No	No	Waiting for Schedule			
255	No	No	Waiting for Schedule			
256	No	No	Waiting for Schedule			
259	Yes	Yes	Review for Certification	75	70	5
260	Yes	Yes	Review for Certification	75	70	5
261	No	No	Waiting for Schedule			
280	Yes	Yes	Review for Certification	73	68	5
281	Yes	Yes	Review for Certification	73	68	5
283	Yes	Yes	Review for Certification	75	70	5
284	Yes	Yes	Review for Certification	75	70	5
288	No	No	Waiting for Schedule			

Train	(1) Train is Currently Operating as of May 2021	(2) Schedule Provided to Metro-North between May 2020 and May 2021	(3) Metro-North Action  Taken	(4) MNR-Calculated Running Time (Minutes)	(5) Current Amtrak Running Time (Minutes)	(6) Running Time Deficiency
132	No	No	Waiting for Schedule			
135	Yes	Yes	Review for Certification	79	78	1
136	Yes	Yes	Review for Certification	79	77	2
137	Yes	Yes	Review for Certification	79	71	8
139	Yes	Yes	Review for Certification	79	77	2
140	Yes	Yes	Review for Certification	79	75	4

Train	(1) Train is Currently Operating as of May 2021	(2) Schedule Provided to Metro-North between May 2020 and May 2021	(3) Metro-North Action Taken	(4) MNR-Calculated Running Time (Minutes)	(5) Current Amtrak Running Time (Minutes)	(6) Running Time Deficiency
141	Yes	Yes	Review for Certification	79	75	4
143	Yes	Yes	Review for Certification	79	77	2
146	Yes	Yes	Review for Certification	77	73	4
148	Yes	Yes	Review for Certification	79	76	3
149	No	Yes	Waiting for Schedule			
150	Yes	Yes	Review for Certification	79	74	5
161	Yes	Yes	Review for Certification	79	77	2
162	Yes	Yes	Review for Certification	79	78	1
163	No	Yes	Waiting for Schedule			
166	Yes	Yes	Review for Certification	79	78	1
167	Yes	Yes	Review for Certification	79	74	5
168	Yes	Yes	Review for Certification	79	76	3
169	Yes	Yes	Review for Certification	79	78	1
170	Yes	Yes	Review for Certification	79	78	1
172	Yes	Yes	Review for Certification	79	77	2
173	Yes	Yes	Review for Certification	79	77	2
175	Yes	Yes	Review for Certification	75	73	2
177	Yes	Yes	Review for Certification	79	75	4
178	Yes	Yes	Review for Certification	79	76	3
179	No	Yes	Waiting for Schedule			
190	Yes	Yes	Review for Certification	79	77	2
65	Yes	Yes	Review for Certification	79	72	7
66	Yes	Yes	Review for Certification	79	76	3
67	Yes	Yes	Review for Certification	79	72	7
82	No	Yes	Waiting for Schedule			
86	No	No	Waiting for Schedule			
95	Yes	Yes	Review for Certification	75	70	5
96	Yes	Yes	Review for Certification	79	74	5
157	Yes	Yes	Review for Certification	79	78	1
174	Yes	Yes	Review for Certification	79	76	3
194	Yes	Yes	Review for Certification	79	76	3
171	Yes	Yes	Review for Certification	77	74	3

Train	(1) Train is Currently Operating as of May 2021	(2) Schedule Provided to Metro-North between May 2020 and May 2021	(3) Metro-North Action	(4) MNR-Calculated Running Time (Minutes)	(5) Current Amtrak Running Time (Minutes)	(6) Running Time Deficiency
176	Yes	Yes	Review for Certification	79	76	3
54	No	Yes	Waiting for Schedule			
55	No	Yes	Waiting for Schedule			
56	No	Yes	Waiting for Schedule			
57	No	Yes	Waiting for Schedule			