

**AMTRAK**

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**William J. Flynn**  
Chief Executive Officer



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 published by the Federal Railroad Administration (“FRA”) on November 16, 2020 (the “Final Rule”), introduces a certified schedule metric that requires the FRA to report 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.

Pursuant to the requirements of the Final Rule, Amtrak and Southern California Regional Rail Authority (SCRRA) are transmitting this letter regarding the following schedules that remain uncertified as of May 17, 2021, as agreement has not been reached on whether the schedule is aligned to customer OTP:

1. Coast Starlight Trains 11 and 14
2. Pacific Surfliner Trains 561, 562, 564, 565, 566, 569, 572, 573, 578, 579, 580, 583, 584, 590, 591, 593, 595, 759, 763, 767, 768, 774, 777, 782, 785, 792, 796, 1564, 1565, 1566, 1569, 1572, 1573, 1584, 1590, 1591, 1761 and 1767
3. Southwest Chief Trains 3 and 4
4. Sunset Limited Trains 1 and 2.

Exhibit A details Amtrak’s position regarding the components of the train schedules which are disagreed upon, signed by me.

A supplemental exhibit providing SCRRA’s position regarding the components of the train schedules which are disagreed upon was requested by Amtrak but has thus far not been received for incorporation into the monthly joint letter prescribed by the Final Rule.



Amtrak and SCRRRA continue to communicate regularly and hope to come to an agreement on the certification of all schedules by no later than September 30, 2021. Please let us know if you have any questions regarding the information provided in this transmittal.

Sincerely,

A handwritten signature in blue ink that reads "William J. Flynn".

William J. Flynn  
*Chief Executive Officer*

Attachment

- 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 Pete Aguilar, U.S. House of Representatives  
The Honorable Brian Babin, U.S. House of Representatives  
The Honorable Nanette Diaz Barragán, U.S. House of Representatives  
The Honorable Karen Bass, U.S. House of Representatives  
The Honorable Michael Bennet, U.S. Senate  
The Honorable Cliff Bentz, U.S. House of Representatives  
The Honorable Ami Bera, U.S. House of Representatives  
The Honorable Andy Biggs, U.S. House of Representatives  
The Honorable Earl Blumenauer, U.S. House of Representatives  
The Honorable Roy Blunt, U.S. Senate  
The Honorable Suzanne Bonamici, U.S. House of Representatives  
The Honorable Julia Brownley, U.S. House of Representatives  
The Honorable Ken Buck, U.S. House of Representatives



The Honorable Cheri Bustos, U.S. House of Representatives  
The Honorable Ken Calvert, U.S. House of Representatives  
The Honorable Salud Carbajal, U.S. House of Representatives  
The Honorable Tony Cárdenas, U.S. House of Representatives  
The Honorable Troy Carter, U.S. House of Representatives  
The Honorable Bill Cassidy, U.S. Senate  
The Honorable Sean Casten, U.S. House of Representatives  
The Honorable Joaquin Castro, U.S. House of Representatives  
The Honorable Judy Chu, U.S. House of Representatives  
The Honorable Emanuel Cleaver, U.S. House of Representatives  
The Honorable John Cornyn, U.S. Senate  
The Honorable Lou Correa, U.S. House of Representatives  
The Honorable Dan Crenshaw, U.S. House of Representatives  
The Honorable Ted Cruz, U.S. Senate  
The Honorable Henry Cuellar, U.S. House of Representatives  
The Honorable Sharice Davids, U.S. House of Representatives  
The Honorable Danny Davis, U.S. House of Representatives  
The Honorable Suzan DelBene, U.S. House of Representatives  
The Honorable Mark DeSaulnier, U.S. House of Representatives  
The Honorable Lloyd Doggett, U.S. House of Representatives  
The Honorable Tammy Duckworth, U.S. Senate  
The Honorable Dick Durbin, U.S. Senate  
The Honorable Joni Ernst, U.S. Senate  
The Honorable Veronica Escobar, U.S. House of Representatives  
The Honorable Anna Eshoo, U.S. House of Representatives  
The Honorable Ron Estes, U.S. House of Representatives  
The Honorable Dianne Feinstein, U.S. Senate  
The Honorable Teresa Leger Fernandez, U.S. House of Representatives  
The Honorable Lizzie Fletcher, U.S. House of Representatives  
The Honorable Bill Foster, U.S. House of Representatives  
The Honorable Ruben Gallego, U.S. House of Representatives  
The Honorable John Garamendi, U.S. House of Representatives  
The Honorable Jesús García, U.S. House of Representatives  
The Honorable Mike Garcia, U.S. House of Representatives  
The Honorable Sylvia Garcia, U.S. House of Representatives  
The Honorable Jimmy Gomez, U.S. House of Representatives  
The Honorable Tony Gonzales, U.S. House of Representatives  
The Honorable Paul Gosar, U.S. House of Representatives  
The Honorable Chuck Grassley, U.S. Senate  
The Honorable Garret Graves, U.S. House of Representatives  
The Honorable Al Green, U.S. House of Representatives



The Honorable Raul Grijalva, U.S. House of Representatives  
The Honorable Josh Hawley, U.S. Senate  
The Honorable Martin Heinrich, U.S. Senate  
The Honorable Yvette Herrell, U.S. House of Representatives  
The Honorable Jaime Herrera Beutler, U.S. House of Representatives  
The Honorable John Hickenlooper, U.S. Senate  
The Honorable Clay Higgins, U.S. House of Representatives  
The Honorable Darrell Issa, U.S. House of Representatives  
The Honorable Sarah Jacobs, U.S. House of Representatives  
The Honorable Pramila Jayapal, U.S. House of Representatives  
The Honorable Robin Kelly, U.S. House of Representatives  
The Honorable Mark Kelly, U.S. Senate  
The Honorable John Kennedy, U.S. Senate  
The Honorable Ro Khanna, U.S. House of Representatives  
The Honorable Derek Kilmer, U.S. House of Representatives  
The Honorable Young Kim, U.S. House of Representatives  
The Honorable Adam Kinzinger, U.S. House of Representatives  
The Honorable Ann Kirkpatrick, U.S. House of Representatives  
The Honorable Darin LaHood, U.S. House of Representatives  
The Honorable Doug LaMalfa, U.S. House of Representatives  
The Honorable Jake LaTurner, U.S. House of Representatives  
The Honorable Barbara Lee, U.S. House of Representatives  
The Honorable Sheila Jackson Lee, U.S. House of Representatives  
The Honorable Mike Levin, U.S. House of Representatives  
The Honorable Ted Lieu, U.S. House of Representatives  
The Honorable Zoe Lofgren, U.S. House of Representatives  
The Honorable Ben Ray Luján, U.S. Senate  
The Honorable Tracey Mann, U.S. House of Representatives  
The Honorable Roger Marshall, U.S. Senate  
The Honorable Doris Matsui, U.S. House of Representatives  
The Honorable Michael McCaul, U.S. House of Representatives  
The Honorable Jeff Merkley, U.S. Senate  
The Honorable Mariannette Miller-Meeks, U.S. House of Representatives  
The Honorable Jerry Moran, U.S. Senate  
The Honorable Patty Murray, U.S. Senate  
The Honorable Grace Napolitano, U.S. House of Representatives  
The Honorable Troy Nehls, U.S. House of Representatives  
The Honorable Marie Newman, U.S. House of Representatives  
The Honorable Jay Obernolte, U.S. House of Representatives  
The Honorable Tom O'Halleran, U.S. House of Representatives  
The Honorable Alex Padilla, U.S. Senate



The Honorable Jimmy Panetta, U.S. House of Representatives  
The Honorable Nancy Pelosi, U.S. House of Representatives  
The Honorable Scott Peters, U.S. House of Representatives  
The Honorable Katie Porter, U.S. House of Representatives  
The Honorable Mike Quigley, U.S. House of Representatives  
The Honorable Chip Roy, U.S. House of Representatives  
The Honorable Lucille Roybal-Allard, U.S. House of Representatives  
The Honorable Raul Ruiz, U.S. House of Representatives  
The Honorable Bobby Rush, U.S. House of Representatives  
The Honorable Linda T. Sánchez, U.S. House of Representatives  
The Honorable Steve Scalise, U.S. House of Representatives  
The Honorable Janice Schakowsky, U.S. House of Representatives  
The Honorable Adam Schiff, U.S. House of Representatives  
The Honorable Kurt Schrader, U.S. House of Representatives  
The Honorable Brad Sherman, U.S. House of Representatives  
The Honorable Kyrsten Sinema, U.S. Senate  
The Honorable Adam Smith, U.S. House of Representatives  
The Honorable Greg Stanton, U.S. House of Representatives  
The Honorable Michelle Steel, U.S. House of Representatives  
The Honorable Marilyn Strickland, U.S. House of Representatives  
The Honorable Mark Takano, U.S. House of Representatives  
The Honorable Mike Thompson, U.S. House of Representatives  
The Honorable Norma Torres, U.S. House of Representatives  
The Honorable Juan Vargas, U.S. House of Representatives  
The Honorable Michael Waltz, U.S. House of Representatives  
The Honorable Maxine Waters, U.S. House of Representatives  
The Honorable Randy Weber, U.S. House of Representatives  
The Honorable Ron Wyden, U.S. Senate

## 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.

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 Southern California Regional Rail Authority to certify the following schedules.

Sincerely,



William J. Flynn  
*Chief Executive Officer*  
Amtrak

**Table 1: Amtrak Schedule Alignment Analysis 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 |
|-------------------|-------|--------------------------|--|----------------------------------|--|---|------------------------------|
| Coast Starlight   | 11    | Seattle-Los Angeles      |  | √                                |  | √   | Aligned to Customer OTP      |
| Coast Starlight   | 14    | Seattle-Los Angeles      |  |                                  |  | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 561   | San Diego-Los Angeles    | √  | √                                | √                                      | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 562   | Los Angeles-San Diego    | √  | √                                |  | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 564   | Los Angeles-San Diego    | √  | √                                | √                                      |   | Aligned to Customer OTP      |
| Pacific Surfliner | 565   | San Diego-Los Angeles    | √  | √                                | √                                      |   | Aligned to Customer OTP      |
| Pacific Surfliner | 566   | Los Angeles-San Diego    | √  | √                                |  | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 569   | San Diego-Los Angeles    | √  |                                  |  | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 572   | Los Angeles-San Diego    | √  | √                                |  | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 573   | San Diego-Los Angeles    | √  | √                                |  | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 578   | Los Angeles-San Diego    | √  | √                                | √                                      | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 579   | San Diego-Los Angeles    | √  | √                                | √                                      | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 580   | Los Angeles-San Diego    | √  | √                                |  | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 583   | San Diego-Los Angeles    | √  | √                                | √                                      | √   | Aligned to Customer OTP      |
| Pacific Surfliner | 584   | Los Angeles-San Diego    | √  | √                                | √                                      |   | Aligned to Customer OTP      |
| Pacific Surfliner | 590   | Los Angeles-San Diego    | √  | √                                | √                                      |   | Aligned to Customer OTP      |
| Pacific Surfliner | 591   | San Diego-Los Angeles    | √  | √                                |  |   | Aligned to Customer OTP      |

|                   |      |                           |   |   |   |   |                         |
|-------------------|------|---------------------------|---|---|---|---|-------------------------|
| Pacific Surfliner | 593  | San Diego-Los Angeles     | √ | √ | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 595  | San Diego-Los Angeles     | √ | √ | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 759  | Los Angeles-Goleta        | √ | √ | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 763  | San Diego-Goleta          | √ | √ |   | √ | Aligned to Customer OTP |
| Pacific Surfliner | 767  | San Diego-Los Angeles     | √ | √ | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 768  | Goleta-San Diego          | √ | √ | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 774  | San Luis Obispo-San Diego | √ |   | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 777  | Goleta-San Diego          | √ | √ |   |   | Aligned to Customer OTP |
| Pacific Surfliner | 782  | Goleta-San Diego          | √ | √ | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 785  | San Diego-Goleta          | √ | √ | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 792  | Goleta-San Diego          | √ | √ |   | √ | Aligned to Customer OTP |
| Pacific Surfliner | 796  | Goleta-San Diego          | √ | √ |   | √ | Aligned to Customer OTP |
| Pacific Surfliner | 1564 | Los Angeles-San Diego     | √ | √ | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 1565 | San Diego-Los Angeles     | √ | √ | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 1566 | Los Angeles-San Diego     | √ | √ |   | √ | Aligned to Customer OTP |
| Pacific Surfliner | 1569 | San Diego-Los Angeles     | √ |   |   | √ | Aligned to Customer OTP |
| Pacific Surfliner | 1572 | Los Angeles-San Diego     | √ |   |   | √ | Aligned to Customer OTP |
| Pacific Surfliner | 1573 | San Diego-Los Angeles     | √ | √ | √ | √ | Aligned to Customer OTP |
| Pacific Surfliner | 1584 | Los Angeles-San Diego     | √ | √ | √ |   | Aligned to Customer OTP |
| Pacific Surfliner | 1590 | Los Angeles-San Diego     | √ | √ | √ |   | Aligned to Customer OTP |



|                   |      |                         |   |   |   |   |                         |
|-------------------|------|-------------------------|---|---|---|---|-------------------------|
| Pacific Surfliner | 1591 | San Diego-Los Angeles   | √ | √ |   | √ | Aligned to Customer OTP |
| Pacific Surfliner | 1761 | San Diego-Goleta        | √ |   |   |   | Aligned to Customer OTP |
| Pacific Surfliner | 1767 | San Diego-Los Angeles   | √ | √ | √ | √ | Aligned to Customer OTP |
| Southwest Chief   | 3    | Chicago-Los Angeles     | √ |   | √ | √ | Aligned to Customer OTP |
| Southwest Chief   | 4    | Chicago-Los Angeles     | √ |   |   | √ | Aligned to Customer OTP |
| Sunset Limited    | 1    | New Orleans-Los Angeles |   |   | √ | √ | Aligned to Customer OTP |
| Sunset Limited    | 2    | New Orleans-Los Angeles |   |   | √ | √ | Aligned to Customer OTP |