

AMTRAK

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

William J. Flynn
Chief Executive Officer



July 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 June 30, 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, 2155, 2159, 2160, 2163, 2164, 2165, 2167, 2168, 2171, 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, 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.

Please note that the following four (4) schedules were certified since the June 1, 2021, letter was transmitted for these train numbers: Acela Trains 2153, 2170 and 2172, and Northeast Regional Train 173.

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

Exhibit B details MNRR's position regarding the components of the train schedules upon which Amtrak and MNRR have not yet agreed, signed by MNRR Senior Vice President of Operations, Justin Vonashek, acting on behalf of 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,

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

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 Pete Buttigieg

July 1, 2021

Page 5



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 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 the June 1 letter, Amtrak provided its analytical framework used to review each schedule and advised that these criteria were included in our December 18, 2020 schedule certification proposal to Metro-North Commuter Railroad (MNRR). The framework includes four criteria: (1) Prior Customer OTP Schedule Modifications, (2) Strong Historical Performance, (3) Recovery Time-Ridership Correlation and (4) Recovery Time Distributed to Passenger Benefit. The “Strong Historical Performance” criteria states that while certification directly relates to the schedule, not actual performance, if a train has regularly exceeded the minimum standard 80% customer OTP, Amtrak deems that schedule to be aligned with the customer OTP metric.

Several meetings were held with MNRR staff since we sent the June 1 letter to further discuss schedule certification. MNRR continued to advise that they would not certify schedules for trains that were not currently running. Amtrak agreed to postpone the discussion of those schedules until July. During a meeting with MNRR on June 21, 2021, Amtrak presented Table 1 below, showing which trains currently running but not certified meet the standard using the quarterly customer OTP performance for FY21 (Note: 3rd Quarter performance was only based upon April and May as the June results were not yet concluded). 69 out of 73 trains (95%) currently meet the standard. This Exhibit A was also provided to MNRR on June 23, 2021.

Amtrak looks forward to continuing to work with MNRR to certify the following schedules.

Sincerely,



William J. Flynn
Chief Executive Officer
Amtrak

Table 1: Amtrak Customer OTP Results by Train for MNRR Uncertified Trains Currently Operating

Train	1st-Qtr	2nd-Qtr	3rd-Qtr (thru May)	Meets Rule	YTD
54	90%	91%	97%	YES	93%
55	97%	96%	100%	YES	97%
56	97%	94%	93%	YES	95%
57	100%	98%	93%	YES	97%
63	90%	95%	90%	YES	91%
64	82%	86%	79%	YES	83%
65	87%	79%	62%	NO	75%
66	94%	94%	85%	YES	91%
67	89%	89%	90%	YES	89%
82	89%	100%	100%	YES	96%
95	89%	85%	83%	YES	86%
96	89%	89%	86%	YES	88%
135	90%	82%	89%	YES	87%
137	97%	93%	81%	YES	90%
139	84%	93%	88%	YES	89%
140	91%	93%	95%	YES	93%
141	91%	88%	92%	YES	90%
143	97%	94%	93%	YES	94%
146	94%	95%	94%	YES	94%
148	96%	96%	92%	YES	94%
150	91%	100%	84%	YES	91%
157	91%	84%	96%	YES	91%
161	93%	89%	89%	YES	90%
162	100%	82%	93%	YES	92%
166	95%	97%	74%	YES	88%
167	93%	77%	86%	YES	85%
168	95%	97%	83%	YES	91%
169	84%	94%	86%	YES	88%
170	92%	93%	94%	YES	93%
171	91%	90%	82%	YES	88%
172	89%	87%	92%	YES	90%
174	89%	91%	90%	YES	90%
175	93%	88%	89%	YES	90%
176	86%	90%	86%	YES	87%
178	99%	99%	89%	YES	95%
179	96%	97%	100%	YES	96%
190	90%	96%	88%	YES	91%
194	92%	84%	73%	YES	83%
232	90%	93%	97%	YES	93%
233	71%	92%	85%	YES	82%
234	98%	95%	100%	YES	98%
236	88%	94%	92%	YES	91%
237	83%	93%	91%	YES	89%

Table 1: Amtrak Customer OTP Results by Train for MNRR Uncertified Trains Currently Operating

Train	1st-Qtr	2nd-Qtr	3rd-Qtr (thru May)	Meets Rule	YTD
238	98%	98%	96%	YES	97%
241	97%	99%	90%	YES	95%
243	98%	100%	85%	YES	93%
244	91%	96%	100%	YES	96%
250	98%	92%	99%	YES	97%
253	100%	92%	100%	YES	97%
259	92%	99%	89%	YES	93%
260	96%	85%	91%	YES	90%
280	98%	100%	96%	YES	98%
281	39%	68%	65%	NO	57%
283	64%	77%	71%	NO	70%
284	66%	89%	93%	YES	82%
290	93%	98%	97%	YES	96%
291	88%	91%	96%	YES	92%
292	97%	97%	93%	YES	96%
2154	85%	75%	82%	YES	81%
2155	80%	75%	70%	NO	74%
2163	90%	83%	80%	YES	84%
2167	75%	90%	100%	YES	83%
2173	96%	99%	95%	YES	96%
2249	100%	99%	93%	YES	97%
2250	89%	83%	96%	YES	90%
2251	93%	90%	80%	YES	87%
2252	93%	92%	92%	YES	92%
2253	92%	86%	86%	YES	88%
2254	97%	89%	87%	YES	90%
2255	98%	86%	78%	YES	86%
2256	92%	96%	74%	YES	86%
2257	99%	96%	91%	YES	94%
2259	97%	91%	95%	YES	94%

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, Amtrak's schedules must provide trains with sufficient running time while in Metro-North's territory. 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. As such, the "host running time" metric, also established by the Final Rule, which compares a train's actual running time with the scheduled running time between the first and final reporting points for a host railroad, is important and must be accurately calculated **prior to certification** to demonstrate the schedule adjustments necessary for Amtrak trains to have enough time to traverse Metro-North's territory and successfully meet the Customer OTP metric and standard.

Almost 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 remains 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. **Therefore, Metro-North will not certify train schedules that are not currently running and have no projected effective date.** A schedule can only be certified when the parties are fully aware of the conditions the train will be operating in, which may change. Similarly, any future adjustments Amtrak seeks to make to previously certified schedules may invalidate Metro-North's certifications and require re-review and re-certification.

After discussions with Amtrak in June, Metro-North is continuing to use 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. Based on this, Amtrak and Metro-North have been able to certify four (4) additional train schedules since the June 1, 2021 letter.

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 and proposed for July 2021 service restoration 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.

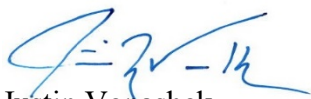
5. What is the definition of Amtrak's current running time? This is the current Amtrak schedule for the Amtrak train on Metro-North's territory.

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 remains committed to working with Amtrak to certify its schedules and ensure its customers have the best possible ridership experience, and looks forward to continuing to work with Amtrak to resolve these differences.

Very truly yours,



Justin Vonashek
Senior Vice President - Operations, 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			
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
2171	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			
2275	No	No	Waiting for Schedule			
2290	No	No	Waiting for Schedule			
68	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
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
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
176	Yes	Yes	Review for Certification	79	76	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 Taken	(4) MNR-Calculated Running Time (Minutes)	(5) Current Amtrak Running Time (Minutes)	(6) Running Time Deficiency
54	No	Yes	Waiting for Schedule			
55	No	Yes	Waiting for Schedule			
56	No	Yes	Waiting for Schedule			
57	No	Yes	Waiting for Schedule			

AMTRAK

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

William J. Flynn
Chief Executive Officer



July 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 New Mexico Department of Transportation (NMDOT) are transmitting this letter regarding the following schedules that remain uncertified as of June 30, 2021, as agreement has not been reached on whether the schedule is aligned to customer OTP:

1. Southwest Chief Trains 3 and 4.

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

Exhibit B details NMDOT’s position regarding the components of the train schedules which are disagreed upon, signed by NMDOT Cabinet Secretary Michael Sandoval.



Amtrak and NMDOT continue to meet regularly and hope to come to an agreement on the certification of all schedules 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

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 Pete Aguilar, 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 Bennett, U.S. Senate
The Honorable Roy Blunt, U.S. Senate
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 Sean Casten, 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 Lou Correa, 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 Tammy Duckworth, U.S. Senate
The Honorable Dick Durbin, U.S. Senate
The Honorable Joni Ernst, U.S. Senate
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 Bill Foster, U.S. House of Representatives
The Honorable Jesús García, U.S. House of Representatives
The Honorable Jimmy Gomez, U.S. House of Representatives
The Honorable Paul Gosar, U.S. House of Representatives
The Honorable Chuck Grassley, U.S. Senate
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 John Hickenlooper, U.S. Senate
The Honorable Mark Kelly, U.S. Senate
The Honorable Robin Kelly, 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 Darin LaHood, U.S. House of Representatives
The Honorable Jake LaTurner, U.S. House of Representatives
The Honorable Ted Lieu, 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 Mariannette Miller-Meeks, U.S. House of Representatives
The Honorable Jerry Moran, U.S. Senate
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 Mike Quigley, U.S. House of Representatives
The Honorable Lucille Roybal-Allard, 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 Janice Schakowsky, U.S. House of Representatives
The Honorable Adam Schiff, U.S. House of Representatives
The Honorable Kyrsten Sinema, U.S. Senate
The Honorable Mark Takano, U.S. House of Representatives

The Honorable Pete Buttigieg

July 1, 2021

Page 4



The Honorable Norma Torres, U.S. House of Representatives
The Honorable Lauren Underwood, U.S. House of Representatives
The Honorable Maxine Waters, 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.

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 New Mexico Department of Transportation 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
Southwest Chief	3	Chicago-Los Angeles	Yes		√	√	Aligned to Customer OTP
Southwest Chief	4	Chicago-Los Angeles	Yes			√	Aligned to Customer OTP

Exhibit B

NMDOT's position regarding Southwest Chief schedule certification

The Southwest Chief operates one train daily in each direction between Chicago and Los Angeles, a distance of 2,265 miles according to Amtrak's published schedules. The NMDOT-owned railroad, New Mexico Rail Runner Express, which operates using the reporting mark NMRX, is the host railroad for 80 miles of the Southwest Chief route located near its midpoint. The Southwest Chief includes two station stops on NMRX, at Albuquerque and Lamy. The eastbound Southwest Chief has scheduled station arrivals at Albuquerque and Lamy at 11:20 AM and 1:02 PM, respectively. The westbound Southwest Chief has scheduled station arrivals at Lamy and Albuquerque at 1:58 PM and 3:29 PM, respectively. Amtrak's published schedules also incorporate recovery time and time to service the trains at Albuquerque.

The Southwest Chief shares 57 miles of its route on NMRX with New Mexico Rail Runner Express, the commuter railroad connecting the cities of Belen, Albuquerque, and Santa Fe. Late arrivals of the Southwest Chief on NMRX territory often result in conflicts between the Southwest Chief and Rail Runner evening peak service. These conflicts result either in lengthy delays for 1,000 Rail Runner commuters returning from work in the evening if the Southwest Chief is given priority, or to financial penalties for NMRX if the Southwest Chief is held until an operational window opens up.

On January 5, 2021, after receiving a written request from Amtrak to certify the Southwest Chief schedule in accordance with Part 237, NMDOT responded in writing that it would like to meet to discuss Amtrak's Southwest Chief schedule before providing such a letter. NMDOT did not receive a response to, or acknowledgement of, that request until May 14, 2021. This lack of response precluded having any discussions with Amtrak related to the certification of the Southwest Chief schedule in advance of the May 17, 2021 deadline for certification identified in Part 273. NMDOT and Amtrak have since held several meetings, beginning on May 24, 2021, and both parties are making progress towards reaching a point where NMDOT can certify the Southwest Chief schedules.

The delayed response from Amtrak to NMDOT's request for discussions is the reason certification of the Southwest Chief schedule in advance of the May 17, 2021 deadline did not occur. Language in Part 273 stating that certifying Amtrak's schedule will preclude later decertification of the schedule was the reason for NMDOT to not certify the schedule until it has had a chance to have these discussions. Additionally, NMDOT understands that BNSF, which is the host railroad for all but about 100 miles of the Southwest Chief, has not only also declined to certify the Southwest Chief schedule but is disputing the schedule under Part 273. Certifying the Southwest Chief schedule while the nature of the dispute between BNSF and Amtrak over the schedule is not known may not be in NMDOT's interest.

NMDOT does have concerns with the schedule and the Part 273 metrics that it desires to discuss with Amtrak before certification. Below, NMDOT lists several concerns with the Southwest Chief schedule that it is discussing with Amtrak.

- NMDOT has no control over whether trains arrive on-time at the two Southwest Chief stations on the NMDOT-owned railroad, which is a key factor in determining Customer OTP, the primary metric in the rulemaking. The Southwest Chief route is 2,265 miles long, with only 80 miles of it on NMDOT-owned track situated near the midpoint of the route. Albuquerque has the fourth highest number of alightings among Southwest Chief stations, accounting for just over ten

percent of all passengers prior to the pandemic. Amtrak has suggested some modifications to the arrival and departure times at Albuquerque that may improve Customer OTP at Albuquerque, which NMDOT is evaluating.

- NMDOT believes the host running time metric is of limited value in evaluating NMDOT's performance in hosting the Southwest Chief due to the inclusion in the schedule of recovery time and train servicing in Albuquerque. Recovery time and train servicing time are included in the host running time metric. Data provided by Amtrak for the host running time metric indicates that the average host running time on NMRX is well below the scheduled running time on NMRX. Trains that arrive late for their entry onto NMDOT track will perform better under this metric than trains that arrive in time, spending less than their scheduled time on NMRX, unless additional delays occur while the Southwest Chief is within NMRX territory.
- Late arrivals of the Southwest Chief on NMRX territory, which are not the fault of NMRX, often directly conflict with scheduled Rail Runner evening commuter service. This conflict results either in delays for approximately 1,000 Rail Runner commuters returning from work, or in financial penalties for NMRX if the Southwest Chief is held until an operational window opens up.

Sincerely,



Michael Sandoval (Jun 30, 2021 12:32 MDT)

Michael Sandoval
Cabinet Secretary

Amtrak-NMDOT Uncertified Trains - Exhibit B (July 2021)

Final Audit Report

2021-06-30

Created:	2021-06-30
By:	David Harris (davidc.harris@state.nm.us)
Status:	Signed
Transaction ID:	CBJCHBCAABAA2edr2MXKs46PMa-BKU4WwbFjF37QeSv

"Amtrak-NMDOT Uncertified Trains - Exhibit B (July 2021)" History

-  Document created by David Harris (davidc.harris@state.nm.us)
2021-06-30 - 4:39:19 PM GMT - IP address: 172.58.109.249
-  Document emailed to Michael Sandoval (michael.sandoval1@state.nm.us) for signature
2021-06-30 - 4:40:02 PM GMT
-  Email viewed by Michael Sandoval (michael.sandoval1@state.nm.us)
2021-06-30 - 6:30:17 PM GMT - IP address: 73.242.240.34
-  Document e-signed by Michael Sandoval (michael.sandoval1@state.nm.us)
Signature Date: 2021-06-30 - 6:32:01 PM GMT - Time Source: server- IP address: 73.242.240.34
-  Agreement completed.
2021-06-30 - 6:32:01 PM GMT

AMTRAK

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

William J. Flynn
Chief Executive Officer



July 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 June 30, 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.



SCRRA has advised that they will reply to Amtrak regarding certification once they have completed their review. Amtrak and SCRRA 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 Bennett, 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 Mike Garcia, U.S. House of Representatives
The Honorable Sylvia Garcia, U.S. House of Representatives
The Honorable Jesús García, 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 Raúl 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 Mark Kelly, U.S. Senate
The Honorable Robin Kelly, U.S. House of Representatives
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 Lauren Underwood, U.S. House of Representatives
The Honorable Juan Vargas, 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