

**AMTRAK**

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**William J. Flynn**  
Chief Executive Officer



September 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 August 31, 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, 2154, 2155, 2159, 2160, 2163, 2164, 2165, 2167, 2168, 2171, 2175, 2190, 2253, 2254, 2255, 2256, 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, 137, 140, 141, 146, 148, 149, 150, 163, 167, 168, 177, 178, and 179
8. Richmond/Newport News/Norfolk Trains 65, 66, 67, 82, 86, 95, 96, 174 and 194



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

We are pleased to report that 20 additional schedules were certified since the August 1, 2021, letter was transmitted.

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 Justin R. Vonashek.

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 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 Pete Buttigieg*

*September 1, 2021*

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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. 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<sup>1</sup>. The 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). Amtrak and Metro North have been meeting regularly to review the schedules.

MNRR continues to advise that they will not certify schedules for trains that are not currently running and as such, they have not engaged in further discussions of these trains.

Amtrak and Metro North have made progress and recently certified the following additional 20 schedules:

1. Acela Trains 2169, 2173, 2249, 2250, 2251, 2252, and 2257
2. Northeast Regional Trains 135, 136, 139, 143, 161, 162, 166, 169, 170, 172, 175 and 190
3. Richmond/Newport News/Norfolk Trains 157

Table 1 appended below 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 will continue to work closely with MNRR on the remaining uncertified schedules.

Sincerely,



William J. Flynn  
*Chief Executive Officer*  
Amtrak

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<sup>1</sup> The four analytic criteria applied to each schedule were: (i) 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, (ii) if a train has regularly exceeded the minimum standard 80% customer OTP, (iii) If a regression, measuring the relationship between the placement of recovery time in the schedule and the number of detraining riders at each station resulted in a strong (0.5 or more) correlation, or (iv) if the recovery time is placed in advance of detraining passengers to help them arrive on-time. If a train schedule met any of these four criteria, the schedule was determined to be aligned with the customer OTP metric. 95% of the trains met more than one criterion.

**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
Acela	2150	Washington-Boston	√	√		√	Aligned to Customer OTP
Acela	2151	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Acela	2154	Washington-Boston	√	√		√	Aligned to Customer OTP
Acela	2155	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Acela	2159	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Acela	2160	Washington-Boston	√	√			Aligned to Customer OTP
Acela	2163	Boston-Washington	√	√		√	Aligned to Customer OTP
Acela	2164	Washington-Boston	√	√		√	Aligned to Customer OTP
Acela	2165	Boston-Washington	√	√		√	Aligned to Customer OTP
Acela	2167	Boston-Washington	√	√		√	Aligned to Customer OTP
Acela	2168	Washington-Boston	√	√			Aligned to Customer OTP
Acela	2171	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Acela	2175	Boston-Washington	√	√	√		Aligned to Customer OTP
Acela	2190	New York-Boston	√	√		√	Aligned to Customer OTP
Acela	2253	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Acela	2254	Washington-Boston	√	√			Aligned to Customer OTP
Acela	2255	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Acela	2256	Washington-Boston	√	√		√	Aligned to Customer OTP
Acela	2258	Washington-Boston	√				Aligned to Customer OTP
Acela	2259	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Acela	2260	Washington-Boston	√	√		√	Aligned to Customer OTP
Acela	2261	Boston-Washington	√	√		√	Aligned to Customer OTP
Acela	2275	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Acela	2290	New York-Boston	√	√		√	Aligned to Customer OTP
Adirondack	68	New York-Montreal	√		√	√	Aligned to Customer OTP
Adirondack	69	New York-Montreal	√	√		√	Aligned to Customer OTP
Ethan Allen Express	290	New York-Rutland	√	√	√	√	Aligned to Customer OTP
Ethan Allen Express	291	New York-Rutland	√	√			Aligned to Customer OTP
Ethan Allen Express	292	New York-Rutland	√	√		√	Aligned to Customer OTP
Ethan Allen Express	293	New York-Rutland	√	√		√	Aligned to Customer OTP

Ethan Allen Express	295	New York-Rutland	√				Aligned to Customer OTP
Ethan Allen Express	296	New York-Rutland	√	√	√	√	Aligned to Customer OTP
Maple Leaf	63	New York-Toronto	√			√	Aligned to Customer OTP
Maple Leaf	64	New York-Toronto	√	√		√	Aligned to Customer OTP
New York - Albany	230	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	232	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	233	New York-Albany	√	√	√		Aligned to Customer OTP
New York - Albany	234	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	235	New York-Albany	√	√	√		Aligned to Customer OTP
New York - Albany	236	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	237	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	238	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	241	New York-Albany	√	√	√		Aligned to Customer OTP
New York - Albany	242	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	243	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	244	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	245	New York-Albany	√	√	√		Aligned to Customer OTP
New York - Albany	250	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	252	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	253	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	254	New York-Albany	√	√	√	√	Aligned to Customer OTP



New York - Albany	255	New York-Albany	√	√	√		Aligned to Customer OTP
New York - Albany	256	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	259	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	260	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Albany	261	New York-Albany	√	√	√	√	Aligned to Customer OTP
New York - Niagara Falls	280	New York-Niagara Falls	√	√	√	√	Aligned to Customer OTP
New York - Niagara Falls	281	New York-Niagara Falls	√				Aligned to Customer OTP
New York - Niagara Falls	283	New York-Niagara Falls	√				Aligned to Customer OTP
New York - Niagara Falls	284	New York-Niagara Falls	√	√	√	√	Aligned to Customer OTP
New York - Niagara Falls	288	New York-Niagara Falls	√	√	√	√	Aligned to Customer OTP
Northeast Regional	132	Washington-Boston	√	√			Aligned to Customer OTP
Northeast Regional	137	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Northeast Regional	140	Washington-Springfield	√	√			Aligned to Customer OTP
Northeast Regional	141	Springfield-Washington	√	√	√	√	Aligned to Customer OTP
Northeast Regional	146	Washington-Springfield	√	√			Aligned to Customer OTP
Northeast Regional	148	Washington-Springfield	√	√			Aligned to Customer OTP
Northeast Regional	149	Boston-Washington	√	√	√	√	Aligned to Customer OTP

Northeast Regional	150	Washington-Boston	√	√		√	Aligned to Customer OTP
Northeast Regional	163	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Northeast Regional	167	Boston-Washington	√	√	√	√	Aligned to Customer OTP
Northeast Regional	168	Washington-Boston	√	√			Aligned to Customer OTP
Northeast Regional	177	Boston-Washington	√	√			Aligned to Customer OTP
Northeast Regional	178	Washington-Boston	√	√			Aligned to Customer OTP
Northeast Regional	179	Boston-New York	√	√	√		Aligned to Customer OTP
Richmond / Newport News / Norfolk	65	Boston-Newport News	√	√	√		Aligned to Customer OTP
Richmond / Newport News / Norfolk	66	Newport News-Boston	√	√		√	Aligned to Customer OTP
Richmond / Newport News / Norfolk	67	Boston-Newport News	√	√	√		Aligned to Customer OTP
Richmond / Newport News / Norfolk	82	Richmond-Boston	√	√		√	Aligned to Customer OTP
Richmond / Newport News / Norfolk	86	Richmond-Boston	√	√	√	√	Aligned to Customer OTP
Richmond / Newport News / Norfolk	95	Boston-Norfolk	√	√		√	Aligned to Customer OTP
Richmond / Newport	96	Newport News-Boston	√	√		√	Aligned to Customer OTP

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

## **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.

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. Amtrak and Metro-North agreed to certify twenty (20) train schedules effective with an Amtrak schedule change on August 30, 2021.

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 R. Vonashek  
Senior Vice President – Operations  
Metro-North Commuter Railroad Company

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			
2171	No	No	Waiting for Schedule			
2175	No	No	Waiting for Schedule			
2190	No	No	Waiting for Schedule			
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	70	3
2256	Yes	Yes	Review for Certification	73	67	6
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			
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			
132	No	No	Waiting for Schedule			
137	Yes	Yes	Review for Certification	79	71	8
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
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
163	No	Yes	Waiting for Schedule			
167	Yes	Yes	Review for Certification	79	74	5
168	Yes	Yes	Review for Certification	79	76	3
177	Yes	Yes	Review for Certification	79	75	4
178	Yes	Yes	Review for Certification	79	76	3
179	No	Yes	Waiting for Schedule			
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
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
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](mailto:william.flynn@amtrak.com) Tel 202-906-3963

**William J. Flynn**  
Chief Executive Officer



September 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 August 31, 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 which is currently focused on schedule changes that will go into effect in October. 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, applying four criteria to determine whether the schedule was aligned to the customer OTP metric<sup>1</sup>.

Table 1 lists each uncertified train schedule by service and notes which dimensional 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*

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<sup>1</sup> The four analytic criteria applied to each schedule were: (i) 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, (ii) if a train has regularly exceeded the minimum standard 80% customer OTP, (iii) If a regression, measuring the relationship between the placement of recovery time in the schedule and the number of detraining riders at each station resulted in a strong (0.5 or more) correlation, or (iv) if the recovery time is placed in advance of detraining passengers to help them arrive on-time. If a train schedule met any of these four criteria, the schedule was determined to be aligned with the customer OTP metric. 95% of the trains met more than one criterion.

**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