



**SOUTHERN RAIL COMMISSION**

February 2, 2016

Daniel R. Elliott III  
Chairman  
Surface Transportation Board  
395 E Street, S.W.  
Washington, DC 20423-0001

Re: Docket No. EP 726

Dear Mr. Elliot:

As the nation’s only congressionally created interstate rail compact, the Southern Rail Commission thanks you for the opportunity to publicly comment on the important rulemaking for the on-time performance of our country’s passenger rail lines. The Southern Rail Commission – an interstate rail compact formed during the 97th Congress by P. L. 97-213 with commissioners appointed by the governors of Alabama, Louisiana, and Mississippi –works across state lines in the South to promote the safe, reliable and efficient movement of people and goods to enhance economic development along rail corridors, provide transportation choices, and facilitate emergency evacuation routes.

On-time performance of our long-distance passenger trains – Amtrak’s Crescent and City of New Orleans – relies on cooperation and coordination between our country’s host railroads and Amtrak. We understand this fact far too well. Prior to Hurricane Katrina, the Gulf Coast was serviced by the Sunset Limited connecting points east of New Orleans with points west all the way to Los Angeles. The terrible on-time performance of this train degraded ridership, which directly increased the cost to the public to operate the train and made it considerably more costly and politically more challenging to reinstate the service lost because of Hurricane Katrina 10 years ago.

The proposed rule for measuring on-time performance is inadequate and doesn’t come close to providing the full picture of the performance of the system. To access host railroad tracks, Amtrak is forced to pad schedules to provide the host railroads ample flexibility in hitting on-time performance metrics. Much of the padding builds in ample recovery time for the host railroads’ lack of preference for passenger trains, and still arrive at the endpoint destination on-time.

For example, Amtrak’s City of New Orleans service provides excessive padding for the second to last stops before the endpoint to give the private railroad every imaginable opportunity to be deemed “on-time” at the endpoint. Heading south, from Hammond, LA to New Orleans, the scheduled trip provides 2 hours for the roughly 60 mile trip, which is more than double the time required heading north. Heading into Chicago, the trip from Homewood, IL to Union Station exceeds the southbound train schedule by nearly 30 minutes.

The padded schedules costs our region’s riders and general public, by means of increased travel times that directly increase operating costs, by more than two hours per run for both the Crescent and City of New Orleans riders. This schedule padding costs the general public millions of dollars per year in increased operating costs and decreased ridership for longer-distance trains. In contrast, the Northeast Corridor has a 7-minute pad for the entire corridor from Boston to Washington, DC.

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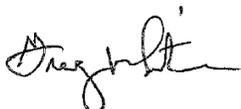
STB can easily provide a clearer picture of the train's on-time performance by including all-stations on-time performance measure found in Table 6 of the Federal Railroad Administration's quarterly *Rail Service Metrics and Performance Reports*.<sup>i</sup> FRA calculates all-station on-time performance by assessing if the train arrived at the station within 15 minutes for all of the stations on the route.

Broadening the rule to include all-stations on-time performance to end point on-time performance provides the public a much clearer picture for the trains that serve our region, and ensures all 16 of our states' stops are accounted for rather than one – New Orleans Union Passenger Terminal. Amtrak's Crescent fails to meet the 80% on-time threshold for end point and an all-station metric assessed by FRA. In the fourth quarter of FY2015, the Crescent was on time just 50% at its end point and 49% for all-stations. Amtrak has sighted Norfolk Southern, the primary host railroad for the Crescent, for train interference and track and signals as the largest cause for delay.

The City of New Orleans achieves end-point on-time performance but fails to achieve all-station on-time performance in the fourth quarter of FY2015. The train was on time at its end point 89% of the time over the period, but just 64% for all stations in the fourth quarter of FY2015. Amtrak has sighted CN, the primary host railroad, for train interference and operational issues as the two largest factors for delay.

The proposed definition of on-time performance does not track performance at intermediate stations, which, as shown by FRA's quarterly report, is already being calculated by FRA and could easily be incorporated into this rule. The Southern Rail Commission strongly encourages the inclusion of all-station on-time performance as well as end-point on time performance in the final rule.

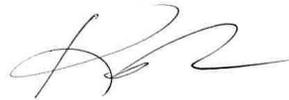
Sincerely,



Greg White  
Chairman



John Spain  
Vice-Chairman



Knox Ross  
Secretary-Treasurer

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<sup>i</sup> FRA Rail Service Metrics and Performance: Quarter Ended September, 2015 (Fourth Quarter of Fiscal Year 2015) - <https://www.fra.dot.gov/eLib/Details/L17310>