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VIA E-FILING

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June 12, 2015

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street SW
Washington, DC 20423

ENTERED
Office of Proceedings
June 12, 2015
Part of
Public Record

Re: STB Docket No. EP 726 On-Time Performance under Section 213 of the
Passenger Rail Investment and Improvement Act of 2008

Dear Ms. Brown:

On January 15, 2015 the Association of American Railroads ("AAR") submitted a conditional petition for rulemaking to define "on-time performance" for purposes of Section 213 of the Passenger Rail Investment and Improvement Act of 2008 ("PRIIA"), 49 U.S.C. § 24308(f). On May 15, 2015, the Board issued a decision instituting a proceeding to consider the issues raised in AAR's petition. On-Time Performance under Section 213 of the Passenger Rail Investment and Improvement Act of 2008, STB Docket EP 726, (STB Served May 15, 2015). The Board said it would issue a notice of proposed rulemaking and a procedural schedule to define on-time performance under PRIIA Section 213. In the decision, the Board concluded that a rulemaking is appropriate, and the Board also noted that "Congress placed importance on the efficient adjudication of on-time performance." *Id.* at slip op 3.

Amtrak hereby respectfully requests the Board issue a notice of proposed rulemaking and establish a procedural schedule with comments due within 30 days of the date of issuance of that decision. Thirty days would be more than adequate time for comments because interested parties have been on notice of the Board's intentions to conduct a rulemaking since the release of the decision instituting the proceeding.

Respectfully submitted,

A handwritten signature in black ink that reads 'Linda J. Morgan'.

Linda J. Morgan
Attorney for National Railroad Passenger
Corporation