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STB Docket Number EP-726-0 Passenger rail OTP

My name is Albert L. Papp, Jr, and I reside at 121 Northfield Road in Millington, New Jersey 07946-1353 and I am submitting comments in regard to Docket EP-726-0 concerning Amtrak on-time-performance criteria. I understand that the proposed rulemaking would deal with two important factors: 1.) the imposition of certain on-time performance characteristics to be adhered to by host railroad operators of Amtrak passenger trains principally at end point termini and 2.) whether a host railroad will prioritize the operation of Amtrak intercity passenger trains deferring scheduling its own freight and commuter trains on behalf of the intercity rail carrier. As a subset of 1.) above, if the intent of the STB is to consider a passenger train "on time" a.) if it arrives at its destination no more than 5 minutes late for each 100 miles travelled or b.) or if it arrives at its destination at a maximum delay of 30 minutes after its scheduled arrival time (whichever is less), then I think this proposed metric needs some adjustment.

Although I use airlines for certain domestic and overseas travel, please bear in mind that I am frequent Amtrak rider from Newark, N.J. to both Northeast Corridor (NEC) cities as well as a traveler on long distance trains originating from Newark and also from Denver, Colorado to west coast locations, both several times yearly and so my comments apply to both proposed rulemaking factors 1.) and 2.) as stated immediately above. The south end of the NEC between New York and Boston is entirely Amtrak owned while the north end between New York and Boston has multiple state commuter owners and operators. Since distances are short (a maximum of 225 miles), the concept of 5 minutes of tardiness for NEC originating and terminating trains per 100 miles is a reasonable standard to enforce. I have experienced delays on the north end on many occasions when the commuter dispatchers gave preference to one of their slower all stops local trains at the expense of our Amtrak intercity service. (In fact, this happened on the "Acela Express" inaugural press run from New York to Boston in December 2000.) That being said, however, there are also several Amtrak long distance routes that originate and terminate on the NEC in New York City and here, the maximum 30 minute delay is inappropriate and needs to be tightened up considerably. This also applies to long distance western trains where, for instance, the California Zephyr between Denver and Emeryville (on which I ride several times yearly), should also be subject to a slightly more generous delay quotient, say 10 minutes at each station, including the end point (not a 30 minute maximum rule). I do not think this is too onerous, given that I am of "a certain age" and well remember riding the New York Central's crack trains between New York and Chicago (including the highly vaunted "Twentieth Century Limited") and that former line's management endeavoring to keep to schedule. Amtrak, today, has a generous amount of "make-up" slack time embedded in their timetabling of long distance trains but, clearly, that is of cold comfort to someone in a rural community where a particular train is his/her only available means of public transportation. The standard needs to be applied evenly across all stations on a given long distance route.

Both adherence to scheduled timings and its immediate first cousin, the running prioritization by host railroad operators (freight and commuter), take on additional significance in today's operating environment, simply because of the paucity of trains on any given Amtrak long distance route. Most routes have only one train in

each direction, some being run only thrice weekly. Such was not the case sixty years ago in my youth. (And yes, I did ride coast-to-coast in the 1960s) Speaking personally, Chicago and Emeryville come easily to mind. Since I travel through the Chicago gateway today, the importance of viable, guaranteed connections become paramount because someone (certainly myself and family) do not relish a wasted night in a hotel/motel and all the inconvenience that that incurs. For example, if the eastbound California Zephyr is quite tardy, then we miss our connection back to Newark on the "Cardinal" and are inconvenienced by being put on another train (if available) either to New York City or to Washington (and thence Newark, N.J.). Same at Emeryville, where a delayed westbound California Zephyr might cause a missed connection with the northbound Coast Starlight. Decades ago, I could count on additional trains on certainly one or, in the case of Chicago, several railroads to complete my journey. Sadly, that is no longer the case. And hence my personal plea to your agency to effect some reasonable - and most importantly enforceable - standards for both on-time performance operational preference by host railroad operators.

Thank you for the opportunity to express my views.

Sincerely,

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