

TO: Surface Transportation Board

ENTERED  
Office of Proceedings  
February 8, 2016  
Part of  
Public Record

FROM: David Ment, 211 West 106<sup>th</sup> Street, Apt. 8B, New York, NY 10025  
[davidment@verizon.net](mailto:davidment@verizon.net); (212) 865-9410

RE: Docket No. EP 726. **Proposed decision on passenger train on-time performance.**

These comments are offered by me in my capacity as a regular customer of Amtrak, who generally travels on long-distance train routes several times each year. I have experienced both on-time and late train trips and have observed the patterns of timeliness and lateness that typically occur along the routes I have been on.

There are trains that have kept pretty much to their schedules throughout a trip. Probably more common in my experiences have been two other patterns:

(1) trains that fall significantly behind schedule but then make up much or all of the time in the last couple of hours of the trip. This seems to be connected with a tendency to “pad” the schedule, leaving a lot of extra time in the last portion of the trip, presumably to make this “catch-up” possible.

(2) trains that fall behind and keep falling further behind as the trip progresses. It is hard for a passenger to know the cause, but it appears that once a train is significantly behind it may lose its place in line and fall behind a slower freight.

From my experience I would make the following recommendations regarding the proposed rule:

(1) The table of maximum allowances for a train to be considered on-time is reasonable, as regards the end point of the trip. But it is not reasonable, nor in the public interest, to consider the end point in isolation. It is necessary also to adopt a reasonable measure for intermediate points.

(2) Adhering to the passenger train schedule at intermediate points is crucial. People get on and off all along the train route. If they are to have confidence in the trains, and to remain customers, they need to believe that the train will generally reach their station at the appointed time. If, for example, passengers at an intermediate station must wait, in the middle of the night, for a train that is two hours late, it is little consolation that the train might arrive in Chicago the next morning only 30 minutes late. If a person plans to attend a business meeting at an intermediate city, but cannot expect the train to keep to schedule, she will be pushed into flying instead. Thus, on-time service at intermediate stations is integral to promoting greater use of the passenger train network and to maintaining the economic health of the national train network.

(3) It should not be necessary to measure on-time performance at every stop along the route. I would suggest that it would be sufficient to measure performance at a limited number of major stations, located perhaps 150 or 200 miles apart, depending on the specific route. For example, in the case of the Capitol Limited, the obvious intermediate stations to measure would be Toledo, Cleveland, Pittsburgh, and possibly Cumberland. By considering timeliness at these stations in the evaluation of the operation of the train, the rule would encourage both Amtrak and the freight railroads to keep the train moving in accordance with its schedule. Otherwise both parties are almost pushed into the practice of padding the end of the schedule.

One final comment. Maintaining on-time performance must necessarily require extra effort on the part of both Amtrak and the freight railroads. There are inevitable costs in maintaining adequate staff for switching, for handling trains at stations, for resolving any problems that come up, and so forth. Unless the standards require this level of effort, neither Amtrak nor the freight railroads can be counted on to go the proverbial "extra mile," but that is exactly what is needed to run an effective national rail system.