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Surface Transportation Board

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Sir/Madam:

As a traveler that uses our public transportation systems especially intercity passenger rail (Amtrak) I am very concerned about on time performance (OTP). I have traveled for business and leisure many times over the years. My current Amtrak station is Seattle, Washington but before retirement Barstow, California, Manassas, Virginia, Anniston, Alabama, and Atlanta, Georgia were my primary departure stations.

Making connections between trains on cross-country trips is important as a traveler and to Amtrak. Amtrak's OTP directly affects its ability to build many more city pairs that I can travel to.

I want to give my support for maintaining a reliable and workable set of on-time performance standards. On-time performance should be considered at intermediate station stops as well as end-point stations. Many travelers do not travel from just the beginning to end-point stations for a particular train. I feel a standard of 10 minutes at intermediate and end-point stations is a valid amount of time as a measure of on-time performance.

I also feel it is very important to maintain Amtrak's "preference" (as the intent of Congress as expressed some 30 years ago and consistently reaffirmed in law and court rulings.) in its operation on freight (host) railroads, as was the intent of the original legislation; see (49 U.S. Code Section 24308c). The changing of the burden of proof from host railroads onto Amtrak to prove that a host railroad's failure to give preference did NOT "materially lessen the quality of freight transportation" is not warranted. This will place an undue and near impossible standard on Amtrak to prove that a host railroad is not providing "preference" as stipulated by law and has "materially lessen the quality of freight transportation."

I would ask that any policy statements that have been issued are or being considered in changing the "preference" be withdrawn.

I ask that 10 minutes as a measure of lateness be consider for intermediate and end-point stations for Amtrak's on-time performance.

Sincerely,

Tim Duncan