



STATE OF MICHIGAN  
**DEPARTMENT OF TRANSPORTATION**  
 LANSING

RICK SNYDER  
 GOVERNOR

KIRK T. STEUDLE  
 DIRECTOR

February 8, 2016

240077

Mr. Scott M. Zimmerman  
 Deputy Director, Office of Proceedings  
 Surface Transportation Board  
 Attn: Docket No. EP726  
 395 E Street, SW  
 Washington, D.C. 20423-0001

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

Dear Mr. Zimmerman:

This letter is to express the State of Michigan's comments on the Surface Transportation Board's (STB's) proposed definition of "on-time performance" (OTP) for purposes of Section 213 of the Passenger Rail Investment and Improvement Act of 2008 (PRIIA).

As background, the Midwest experienced some of the worst OTP of passenger and freight services in the nation. Recognizing the detrimental impacts of this poor OTP, a Midwest-based task force, the Blue Ribbon Panel, was established. The panel examined the railroad operations in the Chicagoland area and provided insights into ways to optimize passenger rail OTP and improve freight rail service. Recommendations from these efforts can be viewed on Amtrak's website at <https://www.amtrak.com/chicagogateway>.

In addition, Michigan's three Amtrak services experienced some of the worst on-time performance in the country. This includes Amtrak's Wolverine (Chicago-Detroit/Pontiac, trains 350, 351, 352, 353, 354, & 355), Blue Water (Chicago-Port Huron Trains 364 & 365), and Pere Marquette (Chicago-Grand Rapids, trains 370 & 371).

The following table summarizes Michigan's intercity passenger rail services over the last several years:

**FY 2013-15 Michigan Service  
 On Time Performance**

Endpoint Performance Percent Arrived on Time					Endpoint Performance Average Minutes Arrived Late				
Train	FY 2013	FY 2014	FY 2015	Avg/Train	Train	FY 2013	FY 2014	FY 2015	Avg/Train
350	47.4%	54.8%	60.3%	54.2%	350	22.8	22.7	16	20.5
351	33.7%	30.2%	35.6%	33.2%	351	29.7	37.6	30.9	32.7
352	22.5%	14.2%	24.1%	20.3%	352	50.8	76.5	47.1	58.1
353	30.5%	37.3%	44.6%	37.5%	353	36.1	35.9	21.6	31.2
354	28.6%	20.1%	23.6%	24.1%	354	40.5	66.5	36.1	47.7
355	34.7%	37.7%	38.6%	37.0%	355	37.6	42	30.5	36.7
364	89.0%	64.6%	76.2%	76.6%	364	-6.8	23.7	2.9	6.6
365	35.9%	15.1%	26.7%	25.9%	365	29.7	46.9	34.7	37.1
370	58.7%	38.6%	44.5%	47.3%	370	14.5	32.3	19.9	22.2
371	44.2%	31.1%	37.5%	37.6%	371	19.8	33.2	23.1	25.4
Avg/Yr	42.5%	34.4%	41.2%		Avg/Yr	27.5	41.7	26.3	

Mr. Scott M. Zimmerman  
Page 2  
February 8, 2016

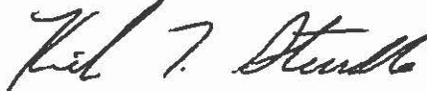
Michigan supports action by STB to define OTP for operation of intercity passenger rail services that is consistent, easily understood by the traveling public, readily measurable, and meaningful for customers, host and operating railroads, service sponsors, and policy-makers. Based on Michigan's review of the proposed definition, we find that as described in Docket No. EP 726, it falls short of these goals in several respects for Michigan's services:

- The proposed rule measures OTP only at the route endpoint, failing to ensure performance for interim station stops. The public should be able to rely upon train schedules at intermediate stops as well as at the final terminus of a route.
- Measuring performance only at the endpoint of a route may cause poorer performance at intermediate stations, with host railroads focused only on arriving at the endpoint on time since that is the only point measured. The definition permits stacking in busy areas and recovery elsewhere.
- Defining only endpoint OTP will generate additional commercial pressure to lengthen schedules and a resistance to reducing travel times when publicly-funded infrastructure improvements are made.
- The proposed rule is silent on the impact and responsibilities of routes operated over multiple host railroads. Each of Michigan's three services operate over multiple host railroads which is problematic for endpoint only OTP.
- Two of Michigan's services are slightly over 300 miles (Wolverine 304 miles and Blue Water 319 miles). The proposed definition would lengthen current OTP measures from 15 minutes to 20 minutes.
- Consistent with defining OTP, standards should also be set for development of route schedules. While necessarily proprietary, capacity modeling tools used to develop route schedules need transparency and independent validation against which route schedules and OTP can be measured.
- Michigan desires to retain the ability to negotiate performance agreements which are separate and apart from the Amtrak host railroad operating agreements. A definition of "on time performance" should not diminish performance of any service which has in place parameters, incentives, and penalties that already work to the satisfaction of the service. Michigan should be able to negotiate for more favorable service outcomes.

Poor OTP of intercity passenger rail services place a significant burden on riders of the train, causing late arrivals and missed connections. This ultimately results in decreased ridership, lost revenues, and higher operating costs. Michigan strongly encourages the STB to implement a revised definition of OTP that considers these import factors to Michigan.

If you have any questions, please contact either me or Tim Hoeffner, Office of Rail Director, at 517-373-6672.

Sincerely,



Kirk T. Steudle  
Director

cc: Deb Miller, STB