



STATE OF MICHIGAN  
DEPARTMENT OF TRANSPORTATION  
LANSING

RICK SNYDER  
GOVERNOR

KIRK T. STEUDLE  
DIRECTOR

February 6, 2015

237706

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

ENTERED  
Office of Proceedings  
February 9, 2015  
Part of  
Public Record

Dear Ms. Brown:

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

This letter is to express the State of Michigan's opposition to the petition filed by the Association of American Railroads to initiate a rulemaking to define "on-time performance" for the purposes of Section 213 of the Passenger Rail Investment and Improvement Act of 2008 (PRIIA), 49 U.S.C. § 24308(f). The State of Michigan respectfully requests that the Surface Transportation Board (the Board) does not initiate a rulemaking and continues the investigation into the on-time performance of the Illini/Saluki passenger rail service in the State of Illinois.

Given the poor on-time performance of the Illini/Saluki passenger rail service, it is especially important for the Board to exercise its authority to investigate issues involving this service. Although the Board holds sufficient authority to proceed with the investigation, initiating a rulemaking will only delay the investigation and resolution of the issue. Moreover, advancing the investigation will not disadvantage any other freight railroads which Amtrak operates and will not exclude the Board's authority permitting interested parties' participation in the investigation.

The Midwest experiences some of the worst on-time performance ratings in the nation. Michigan's three intercity passenger rail services experience an average on-time performance of 36 percent among the three routes. Recognizing the detrimental impacts of poor on-time performance, a Midwest-based task force, the Blue Ribbon Panel, has been created to examine the railroad operations in the Chicagoland area. The panel is undertaking ways to optimize passenger rail on-time performance and improve freight rail service. A final report and recommendations are expected in May 2015.

The poor on-time performance of intercity passenger rail service places 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. Therefore, I strongly urge the

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Board to advance the investigation into the on-time performance of the Illini/Saluki passenger rail service.

If you have any questions, please do not hesitate to contact either me or Tim Hoeffner, Office of Rail Director, at 517-373-6672, to discuss this matter in greater detail.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk T. Steudle". The signature is written in a cursive style with a large initial "K" and a long horizontal stroke extending to the right.

Kirk T. Steudle  
Director