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Surface Transportation Board  
Office of Proceedings  
395 E Street, S.W.  
Washington, DC 20423-0001

726  
RE: Docket No.: EP-~~728~~

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Dear Sir or Madam:

I appreciate the opportunity to provide guidance about revising the Surface Transportation Board's standard interpretation of "on time" performance in connection with its implementing the intercity passenger train on-time performance and preference provisions of 49 U.S.C. 24308(c) and (f).

Please consider this simple, straight forward approach:

1. "On-time" means precisely that: "on-time".

Accordingly, a train that arrives five minutes behind schedule arrives five minutes late.

To define "on-time" any other way serves no useful public purpose. It is deliberately misleading, and creates misinformation that erodes the public's confidence and trust.

In contrast, in countries like Switzerland and Japan railroads truly strive to be "on time" and their positive results in that regard are self-evident. So, American railroads in the 21st Century should follow their example, and this is the goal that needs to be codified into our law -- replacing the obsolete and ineffective old ICC standard.

2. If a train's run is annulled mid-route, it should be counted in the computation of overall "on time" performance (except in cases of natural or man-made disasters). If a run is started, but not completed, it ought not vanish into thin air. It must be counted, and accounted for.

3. The achievement of on-time performance is crucial for American passenger rail services to be successful and gain ridership. Trains must be dependable. If travelers cannot reasonably depend on arriving at their destinations when they expect and need to then ridership will plummet and the result is that those routes will no longer be viable.

So, as the result of this rule revision, I sincerely hope that "on time" will again mean what it always has meant to most rational people: "on time".

Thank you for your consideration.

Sincerely yours,

A handwritten signature in cursive script that reads "Lawrence W. Scheyer". The signature is written in black ink and includes a long horizontal flourish extending to the right.

Lawrence W. Scheyer