



February 8, 2016

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Daniel Elliott III, Chairman
Surface Transportation Board
Attn: Docket No. EP 726
395 E Street, S.W.,
Washington, DC 20423-0001

Re: Comments on EP 726

Dear Chairman Elliott,

The Train Riders Association of California (TRAC) is an advocacy organization focused especially on intrastate rail issues in California. California is engaged in a statewide effort to reduce GHGs by changing our land use and travel patterns. A major investment in rail transit is underway.

With congestion such a severe problem in our State's metropolitan regions, schedule reliability is the best selling point for converting commuters from auto to the rail mode. By impacting schedule reliability, delays to Amtrak caused by host railroads are a major impediment to expanding the mode share for passenger rail transit in our state. This is an issue that Amtrak and our members have been powerless to address. We thank your Board for considering this NPRM.

A clear and consistently enforced definition of On-Time Performance (OTP) is critical to the future of passenger rail transit. TRAC is less concerned with OTP at intervening stations. We know of no evidence for why OTP at the final station will not be a reasonable proxy for OTP on a station-by-station basis, at least for the route lengths in our State. We support that aspect of the proposed definition.

However, we are concerned about the laxness of the proposed definition for the grace period after scheduled arrival. Five minutes per 100 route miles is simply too much. Nations with modern passenger rail service such as Switzerland and Japan are known for their split-second schedule reliability. In the year 2016, a lax standard from 1973 is no longer adequate. We believe an acceptable compromise would be three minutes per 100 route miles, with a 30 minute cap.

Sincerely yours,

/s/ DAVID SCHONBRUNN

David Schonbrunn, Vice-President for Policy

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