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MICHIGAN HOUSE OF REPRESENTATIVES

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

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To Whom It May Concern,

I write this letter in regards to the Surface Transportation Board's (STB) proposed rule to define "On-time Performance" (OTP) for intercity passenger rail. As the State Representative from the 69th district, I have the pleasure of representing the city of East Lansing, home to Michigan State University.

Michigan invests approximately \$25 million each year in its annual operating contract with Amtrak. In addition, the Amtrak station in my district recently underwent a \$6.3 million reconstruction project funded by the U.S. Department of Transportation as part of the Capital Area Multimodal Gateway. The station will serve as a transit hub for Amtrak trains as well as bus service from various companies and will eliminate the overcrowding that existed at the previous station.

Amtrak provides a valuable service, however on-time performance seems to be one of the two major culprits that impact ridership (the other being gas prices). As you are probably aware, Amtrak recently conducted a study on the impact of punctuality and low fuel prices in relation to ridership and revenue. In addition to the impacts of fuel costs, the model found a 2.7 percent decrease in overall ridership from 2013-2014 due to on-time performance.

Because many passengers do not ride the entire length of the rail route, the STB definition should consider OTP for intermediate stations along the route and not simply the final destination. Allowing riders to more accurately plan for and utilize rail services is critical for commuter and tourism purposes. Many stations, East Lansing included, use bus service to connect between stations for various routes making OTP imperative for travelers needing to connect other scheduled modes of transportation in order to arrive at their final destination. Simply put, a more accurate definition of OTP performance that includes intermediate locations throughout the rail route will result in better performance, increased ridership and passenger satisfaction, and a better use of state and federal dollars.

Thank you for your consideration.

Sincerely,

Sam Singh
State Representative
69th District