

240056

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To: STB:

The current rule of 5 minutes of lateness for each 100 miles of a train's route, up to a maximum of 30 minutes, measured only at a train's final station, is not an appropriate definition of on-time. Most of Amtrak's long distance routes have 45-90 minutes of extra "pad" time near the end of the route, so that a train can operate 60-90 minutes late throughout its route, then arrive at its final destination just under 30 minutes late and be considered on-time. Since the 1970s, at the encouragement of freight railroads, many long distance routes' travel time has been extended by hours.

Also, for shorter routes, like Boston to Portland, ME and New York City to Albany, a tolerance of just 10 minutes is permitted (since under 200 miles). Instead, a standard 15 minutes should be used on all Amtrak routes, regardless of distance. Whether I fly from NY to LA or take the train from Chicago to LA, the standard of 15 minutes, which is currently used by all airlines, provides consistency. A reasonable pad time is currently used by Amtrak at many major station stops on long distance routes, almost to an extreme between the final two station stops on some long distance route. Also, measuring only at the final station could permit even more "pad" time, like 2 hours, of travel time added just before the final station, to improve the on-time statistics. Not sure how this would be handled, but a review of on-time at major station stops along a long distance route should be monitored to see where a large excess of travel time could be occurring. For example, if a train from New York to Miami arrives Miami 80% on-time, but arrives Orlando 10% on-time, a review of excess padding of the schedule may be appropriate, since more passengers may actually be traveling to Orlando than to Miami.

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