



Oregon

Kate Brown, Governor

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February 5, 2016

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

Re: Ex Parte 726: On-Time Performance under Section 213 of the Passenger Investment and Improvement Act of 2008

Dear Ms. Brown:

With respect to the Board's Notice of Proposed Rulemaking to determine a definition of "on-time performance" for purposes of Section 213 of the Passenger Rail Investment and Improvement Act of 2008, the Oregon Department of Transportation offers the following comments:

- On-time performance at intermediate stations should be accorded equal weight with timeliness at originating and terminating points when evaluating punctuality. As an example, in the Pacific Northwest the preponderance of stations served along the Cascades corridor are intermediate points and even the region's two largest cities, Portland and Seattle, are intermediate points for certain schedules. Close attention to schedule-keeping en route directly benefits end-point timeliness.
- The formula for calculating on-time performance of a train should measure the actual arrival time at each station along that train's route (utilizing the method known as All-Stations OTP).
- The Board's definition of "on-time performance" should include a mechanism to preserve the ability of states, Amtrak and host railroads to negotiate contractual agreements with differing measures of OTP applicable to specific services.
- When a train's route includes traversing more than one host railroad the receiving carrier of a late-running train should not be penalized for the schedule deficiency inherited from the delivering railroad.

Thank you for the opportunity to provide comment.

Sincerely,

H. A. (Hal) Gard, Administrator
ODOT Rail and Public Transit Division

