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To: Members of the Surface Transportation Board (STB)  
From: Richard Rudolph, Ph.D., Chairman, Rail Users' Network  
Re: Rail Users' Network response to the STB Notice of Proposed Rulemaking (NPRM) in Docket EP-728 and its companion Public Policy Statement (PPS) in Docket EP-726 on December 28, 2015.

The following was adopted by the Rail Users' Network Board of Directors at its meeting held in New York, February 6, 2016.

There are many ways to measure on-time performance. Typically for the airlines, a flight is considered on-time if it arrives its destination within 15 minutes of schedule and commuter trains are considered on-time if a train arrives at its final station within 5 minutes of schedule. Today, for intercity rail, on-time is a mixture of 10 minutes, 20 minutes, or 30 minutes within schedule, depending on the length of the route, and is measured only at the scheduled arrival time at a train's final station. With some intercity routes lasting 2 hours and others lasting 2 or 3 days, there is much variety in the traveling distance of trains in the United States. In addition, the current practice of adding 45-90 minutes of extra time at the end of long train route (between the final 2 stations) can result in a train that is operating well over an hour late at most stations, to then be on-time at its final station, if it arrives at the final station within 30 minutes of schedule. Here are several options to the current on-time measurements which we believe the STB needs to consider before adopting its Proposed Rulemaking in Docket EP-728.

A. Change to a flat 15 minutes within schedule for an intercity train to be considered on-time, which matches the current on-time for airlines. A flight from NY to Boston and NY to LA both have the same 15 minute tolerance, so trains should also have the same 15 minutes, regardless if a 3 hour trip or a 2 day trip. With the practice of extra padding at the end of a long distance train, then also permitting a 30 minute tolerance is not necessary. The train would continue to be measured on-time at its final scheduled station. Since commuter trains are often a different type of operation than intercity rail, and usually are only traveling less than 90 miles, the 5 minutes for commuter trains would remain as 5 minutes as they are measured today.

B. Since an intercity train stops at multiple stations, often including major cities, along the way, measure 1 or 2 or 3 of the major intermediate station stops, where a lot of passengers get off the train and include those in the on-time statistics, as well as the final station. For example, on the route from Chicago to Emeryville, measure whether the train is within 15 minutes of scheduled arrival at Denver, Salt Lake City, Reno, and Emeryville. On the train from NY to Chicago, measure Cleveland and Chicago. This shows a more realistic percentage of on-time for passengers on a given train route, than when only measuring the final station stop.

C. Use a passenger weighted average for on-time percentage, by measuring the number of passengers getting off the train at each stop and whether the train is on-time at the

station. For example, on a train from NY to Albany, if 30 passengers get off at Rhincliff, 40 passengers get off at Hudson, and 50 passenger get off at Albany and the train is on-time at Hudson and Albany, but late at Rhincliff, then the on-time percentage would be 90/120 (40 Hudson passengers on-time plus 50 Albany passenger on-time, out of a total of 120 passengers), which is 75% for that particular train, for the passenger weighed on-time. In other words, 75% of passengers on-board that train arrived their specific final station on-time. Obviously this option is more complicated, but exact station arrival times and passengers at each specific train are tracked today, so the information is available to perform this calculation.

Richard Henry Rudolph

P.O. Box 8015  
Portland, ME 04104  
Rrudolph1022@gmail.com