



Transportation

PAT McCRORY
Governor

NICHOLAS J. TENNYSON
Secretary

February 22, 2016

The Honorable Daniel R. Elliott III
Chairman
United States Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423-0001

The Honorable Debra Miller
Vice Chairman
United States Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423-0001

The Honorable Ann D. Begeman
United States Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423-0001

Re: Surface Transportation Board Decision
Docket No. EP 728
Policy Statement on Implementing Intercity Passenger Train On-Time Performance and Preference Provisions of 49 U. S. C. §24308 (c) and (f)

240181

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February 22, 2016
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Public Record

Dear Chairman Elliott and Surface Transportation Board Members:

On behalf of the North Carolina Department of Transportation (NCDOT), we submit this comment regarding the Board's policy statement on implementing the intercity passenger train on-time performance and preference provisions of 49 U. S. C. §24308(f).

NCDOT supports two passenger train routes operated by the National Railroad Passenger Corporation (Amtrak): the *Carolinian* with daily service between Charlotte, North Carolina and New York, New York, and the *Piedmont* with twice daily service between Charlotte and Raleigh, North Carolina. NCDOT, in cooperation with Amtrak and host railroad partners, has focused on improving service quality and reliability since the inception of these services. NCDOT and USDOT through the Federal Railroad Administration have invested over \$1.1 billion in new and refurbished equipment, station upgrades, and railroad track capacity upgrades to mitigate conflicts between passenger trains themselves and between passenger trains and freight trains, ultimately providing a better customer experience to passengers using North Carolina supported services.

It is essential that discussions and analysis of preference investigations on the part of the Surface Transportation Board are opaque to policy makers and the general public to whom NCDOT is ultimately responsible. In general, discussions of preference on the host railroad become challenges of both proprietary dispatch methods and performance. Host railroads have no incentive to provide this information for public examination and regard the particulars of



dispatching as proprietary. Public investment in host railroad corridors requires a level of transparency consistent with the public interest as outlined by elected officials and consistent with North Carolina and Federal public records standards. Final accounting of the costs and benefits of passenger service generally remains hidden from the public. We believe this discourages public investment and ultimately harms the accountability of services to the public interest.

Thank you for the opportunity to comment on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul C. Worley", written in a cursive style.

Paul C. Worley, CPM
Rail Division Director

PW/jmd