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February 8, 2016

Office of Proceedings

February 8, 2016

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

**Part of
Public Record**

**Re: Docket No. EP 726, On-Time Performance under Section 213 of the
Passenger Rail Investment and Improvement Act of 2008**

Dear Ms. Brown:

Enclosed for filing in the above-referenced docket are the National Railroad Passenger Corporation's Comments on the Board's Notice of Proposed Rulemaking on On-Time Performance under Section 213 of the Passenger Rail Investment and Improvement Act of 2008.

If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William H. Herrmann", written over a horizontal line.

William H. Herrmann
VP & Managing Deputy General Counsel

Enclosures

Docket No. EP 726

STB Notice of Proposed Rulemaking

On-Time Performance under Section 213 of the Passenger Rail Investment and Improvement Act of 2008

COMMENTS OF THE NATIONAL RAILROAD PASSENGER CORPORATION

February 8, 2016

The National Railroad Passenger Corporation (“Amtrak”) submits these comments in response to the Board’s December 16, 2015 Decision in Docket No. EP 726, “On-Time Performance under Section 213 of the Passenger Rail Investment and Improvement Act of 2008” (served December 28, 2015) (*see* Fed. Reg. Vol. 80, No. 248 at 80737 (Dec. 28, 2015) (the “Decision”). For purposes of these comments, the rule proposed by the Board in the Decision as 49 CFR Part 1040 is referred to as the “Proposed Rule,” and Section 213 of the Passenger Rail Investment and Improvement Act of 2008, 49 USC § 24308(f), is referred to as “PRIIA 213.”

A. Introduction

Amtrak agrees with the Board (Decision at 6) that the definition of “on-time performance” under PRIIA 213 should (1) be meaningful, (2) be straightforward and able to be applied with ease and clarity, and (3) take into account past decisions of the Interstate Commerce Commission (“ICC”) regarding adequate passenger rail service. For the reasons given below, Amtrak respectfully submits that the only measurement that meets all these requirements is the one that measures performance of Amtrak trains on host railroads at all intermediate stations as well as at endpoint stations – a measurement known as “All-Stations OTP.” As both Congress and the ICC have recognized, All-Stations

OTP is the most inclusive and revealing measurement of Amtrak train performance. Therefore, the only appropriate definition of “on-time performance” for purposes of triggering a PRIIA 213 investigation is All-Stations On-Time Performance, as described below.

Conversely, measuring performance only at route endpoints, as in the Proposed Rule (“Endpoint OTP”), results in an incomplete, and in some cases distorted, picture of actual performance, significantly because it fails to take into account the experience of almost two-thirds of Amtrak passengers. Measuring performance only at the endpoints of Amtrak routes takes into account performance at only 10% of all Amtrak stations; leaves performance within 24 states unmeasured altogether since those states have intermediate stations but no endpoint stations; and leaves unaddressed the many routes where performance appears to be above 80% when measured only at the last station on the route, but is significantly and chronically less than 80% at stations all along the route.

As we discuss more fully below, there exists no legal precedent, or practical reason, to prioritize the expectations or experiences of the 35% of Amtrak passengers who happen to be travelling to the 10% of Amtrak stations that comprise the final terminus on any given route, while ignoring the passengers disembarking at the remaining 90% of stations. In fact, quite the opposite: both Congress and the ICC have recognized that measuring performance at all stations provides a fuller and more accurate picture of performance. All-Stations OTP is also simple and straightforward to calculate, and avoids subjective factors that can lead to protracted disputes.

Amtrak therefore urges the Board to adopt “All-Stations OTP,” as described below, as the means of measuring “on-time performance” for purposes of triggering an investigation under PRIIA 213.

B. Congress and the ICC Both Recognized That Performance Should Be Measured at All Stations on A Route, Not Just at the Final Terminus

In 1970, Congress enacted the Rail Passenger Service Act (RPSA), P.L. 91-518, 84 Stat. 1327 (1970), “to prevent the complete abandonment of passenger rail service” by creating Amtrak to relieve the freight railroads from the obligation of operating passenger trains at a loss. House Committee Report 91-1580, October 7, 1970, at 1. Almost immediately thereafter, the freight railroads began to prioritize freight over passengers, with the average performance of long distance trains plummeting from over 70% in 1972 to 35% in 1973. Hearings on H.R. 8351 before the Subcomm. on Transp. and Aeronautics of the House Comm. On Interstate and Foreign Commerce, 93rd Cong., 1st Sess., at 29-32. In response, Congress enacted what is now 49 U.S.C. § 24308(c), requiring freight railroads to give Amtrak trains preference, and the ICC, which had been authorized by the RPSA to prescribe such regulations as necessary to provide for safe and adequate passenger service,¹ issued regulations regarding the performance of Amtrak trains on host railroad tracks.

In its Decision (at 4), the Board states that the Proposed Rule’s definition of “on-time performance” is “derived from a previous definition of on-time performance used by the [ICC]...” The Board then quotes from the ICC’s 1973 decision in *Adequacy of Intercity Rail Passenger Serv.*, 344 I.C.C. 758, 809, which adopted regulations (former 49 C.F.R. § 1124.6) providing that each intercity passenger train “shall arrive at its final terminus no later than 5 minutes after scheduled arrival time per 100 miles of operation, or 30 minutes after scheduled arrival time, whichever is the less.”

However, soon after adopting this regulation the ICC initiated a proceeding “to inquire into and determine the quality of intercity rail passenger service with a view toward determining whether the Commission should prescribe additional rules and regulations...,” held public hearings, and took

¹ RPSA § 801, 84 Stat. 1327, 1339 (1970) (“The Commission is authorized to prescribe such regulations as it considers necessary to provide safe and adequate service, equipment, and facilities for intercity rail passenger service.”).

testimony from over 300 public witnesses and railroad representatives. *Adequacy of Intercity Rail Passenger Serv.*, Ex Parte No. 277 (Sub-No. 3) (March 29, 1976), 351 I.C.C. 883, 883. As a result of that intense scrutiny, the ICC determined that a performance standard that focused on performance at only one station per route should be modified. The Commission stated (*id.* at 910):

“As now worded Rule 6(b) seems to indicate that on-time performance is required, and that passengers have a right to expect on-time service, only at end-point destinations of the trains. The [ICC Bureau of Enforcement] proposes changes in Rules 6(b) and (c) to make clear that ***on-time service is required at intermediate stops, as well as at the end-point stations of any route.*** The changes are clearly justified to clarify passenger rights and the carrier’s obligations. ***The public should be able to rely upon train schedules at intermediate stops as well as the ‘final terminus’ of a route.***” (Emphasis added)

Accordingly, in 1976 Section 1124.6(b) of the *Adequacy of Service* regulation was amended. The language quoted by the Board in its Decision was amended to read:

Section 1124.6. Arrival and departure times. ... (b) Where safe operation permits, the train shall arrive at its final terminus ***and at all intermediate stops*** no later than 5 minutes after scheduled arrival time per 100 miles of operation, or 30 minutes after scheduled arrival time, whichever is the less. (Emphasis added)

The ICC’s ultimate adoption of an all-stations standard for measurement of the quality of passenger rail service in its former regulations demonstrates that an all-stations standard is the best standard. The revised Rule 6(b), measuring performance at all stations, remained in effect until the ICC’s adequacy of service jurisdiction was repealed in 1979.²

The same principle behind the ICC’s revised measurement of “on-time performance” is evident in 49 USC § 24101(c)(4) – originally enacted in 1981 and still in effect today – in which Congress provided:

² As the Board noted in its Decision, however, Congress’s repeal of the ICC’s adequacy of service jurisdiction over Amtrak “implied no Congressional judgment on the merits of the ICC’s definition of on-time performance.” Decision at 5, n.5.

(c) Goals. – Amtrak shall ... operate Amtrak trains, to the maximum extent feasible, **to all station stops within 15 minutes** of the time established in public timetables (Emphasis added)

Congress has never adopted or approved of a standard or goal for Amtrak performance based solely on arrival time at a single station along a route. Therefore, there is no basis for inferring that Congress meant to do so when it made 80% “on-time performance” the trigger for a PRIIA 213 investigation in 2008. To the contrary, in light of both the statute and the ICC’s adoption of the all-stations standard, the most reasonable conclusion is that Congress intended that the term “on-time performance” as used in PRIIA 213 refer to performance at all stations, and that the STB’s PRIIA 213 jurisdiction to investigate substandard performance be used to ensure that, in the words of the ICC, “the public [could] rely upon train schedules at intermediate stops as well as the ‘final terminus’ of a route.” As discussed more fully in Sections C. and D. below, All Stations OTP is the best measurement to effectuate that intent.

C. All-Stations OTP is a Currently-Used, Well-Developed, and Transparent Standard

All-Stations OTP can be described easily as follows: All-Stations OTP measures the performance of each train at each station along the train’s route against the published schedule. A train is considered “on time” at a station if it arrives within 15 minutes of the scheduled arrival time. For each train over a given time period, All-Stations OTP is calculated by dividing the number of “on time” station arrivals by the total number of station arrivals. Because origin stations have no arrival time, at those stations it is the actual departure time that is instead measured against the scheduled departure time.

Amtrak already measures and publishes the All-Stations OTP statistic on its website, and in monthly reports shared with the host railroads, the FRA, the Board, Congress, and others. Host railroads have access to the Amtrak database that contains the data used to calculate All-Stations OTP. The All-Stations OTP measurement is therefore a transparent one with which all involved parties are familiar.

Moreover, the All-Stations OTP measurement is very much like the Endpoint OTP measurement proposed by the Board in several significant ways.

For example, like Endpoint OTP, All Stations OTP measures performance by comparing actual arrival time to the public schedule arrival time. Amtrak agrees with the Board that “relying on a comparison between Amtrak’s scheduled arrival time and the time an Amtrak train actually arrives at” a station is “clear and relatively easy to apply.” (Decision at 6.) This is accomplished as much in the All-Stations OTP measurement as it is in the Endpoint OTP measurement. In addition, measuring performance against the public schedule is both fair to the parties and meaningful to the public, since (1) the public schedules are negotiated between, and agreed to by, both the host railroad and Amtrak, and (2) measuring against those schedules aligns with the passengers’ expectations and experience on the train.

In addition, like Endpoint OTP, measuring All-Stations OTP is a simple arithmetic calculation that does not require consideration of causes of delay, adjustments for construction on a line, or other factors likely to lead to disputes. A train either arrives “on time” or not at a station; the number of on-time arrivals is divided by total arrivals; and the result is stated as a percentage which determines whether a PRIIA 213 investigation should be initiated.³

³ These characteristics separate All-Stations OTP (and Endpoint OTP) from various other measurements that have been proposed by host railroads over the years, such as measuring the performance of a host railroad by whether or not it earned an incentive payment under the negotiated terms of each railroads’ Operating Agreement. Those incentive provisions are not uniform across railroads; do not involve a simple calculation but rather the application of specific rules and exceptions running to several pages in most cases based on arms-length negotiations focused on overall compensation; and bear only an indirect relationship to the experience of Amtrak passengers.

Thus, the All-Stations OTP measurement shares with the proposed Endpoint OTP measurement certain important and favorable characteristics; but All-Stations OTP also cures the numerous substantive deficiencies of measuring on-time performance at only one station on a route.⁴

D. All-Stations OTP Is the Most Meaningful and Fair Standard to Apply In Determining When to Initiate a PRIIA 213 Investigation

Measuring performance at all stations along a route, rather than at one station at the end of a route, is the only way to provide an accurate picture of how a train is performing and to avoid distortions in the data that would allow certain poorly-performing routes to avoid accountability under PRIIA 213. This is because any measurement using the endpoints alone ignores the experience of the majority of Amtrak passengers at the vast majority of Amtrak stations. Specifically:

- Only 10% of all Amtrak stations are endpoints. That means that, if the Proposed Rule were adopted, performance at 90% of all Amtrak stations would go unmeasured for PRIIA 213 purposes. *See Exhibit 1 attached hereto.*

- Only about one-third of Amtrak passengers detrain at the end-point of a route; the other two-thirds detrain at an intermediate Amtrak station.⁵ Arriving at their destination on-time is as important to the large number of passengers disembarking at intermediate stops as it is to the fewer number of passengers disembarking at the final stop. *See Exhibit 2 attached hereto.*

⁴ If only one measurement is to be adopted, All-Stations OTP provides the most inclusive and revealing picture of a train's overall performance for PRIIA 213 purposes. However, Amtrak would not oppose a standard by which a PRIIA 213 investigation could be initiated if for any two consecutive calendar quarters an intercity passenger train averaged less than 80% All Stations OTP **or** less than 80% Endpoint OTP.

⁵ If one measures passengers who **either** board or disembark at an intermediate station, the percentage jumps to approximately 88%.

- Twenty-four of the 46 states with Amtrak service have intermediate stations but no end-point stations in their state. Thus, if the Proposed Rule were adopted, more than half of the states served by Amtrak would not have performance measured within their state at all for PRIIA 213 purposes. *See Exhibit 3 attached hereto.*
- A tolerance of within 15 minutes at all stations, as proposed by Amtrak, also provides a more meaningful measure to the passenger. A passenger travelling 50 miles between stops on a 1,000-mile route should not experience more delay at his or her final stop than a passenger travelling 50 miles between stops on a 100-mile route.

Moreover, on-time performance at the endpoint cannot reliably be used as a “proxy” for overall performance because it often varies significantly from performance at other stations along the route. On many routes “on-time performance” would appear to be above 80% if only arrival at the endpoint is measured, although performance is significantly and chronically less than 80% at the stations all along the route. *See Exhibit 4 attached hereto.* Using Endpoint OTP as the trigger for a PRIIA 213 investigation would leave performance on those chronically substandard routes unaddressed.

Finally, given all of the above, measuring performance only at the endpoint of a route could provide an incentive to host railroads to place little or no emphasis on trying to deliver Amtrak trains to intermediate stations on time, and instead focus solely on arriving at the endpoint on time, to the detriment of the majority of Amtrak’s passengers and ultimately to Amtrak itself.⁶

⁶ According to a Department of Transportation Inspector General study, poor on-time performance costs Amtrak approximately \$137 million per year. OIG Report No. CR-2008-047, “Effects of Amtrak On-Time Performance” at p. 4 (March 28, 2008).

E. All-Stations OTP is Straightforward and Easy to Calculate

In its Decision (at 6), the Board justified adopting Endpoint OTP on the grounds that it “would simplify the record-keeping and production of evidence that may otherwise be necessary for Amtrak and the host carriers if on-time performance were defined using a number of additional factors, such as the amount of delay at intermediate stops...” But once the means of calculating All-Stations OTP is understood, it becomes clear that it does not involve any more complicated or burdensome record-keeping or evidence production than Endpoint OTP, and the data has long been captured by Amtrak and shared with the host railroads and several federal entities.

The data on arrival and departure times at stations are initially derived from Amtrak’s GPS-based automated reporting system, which is currently in place at the vast majority of Amtrak stations, and are calculated without reference to “fault” or “causation,” leading to little controversy about these statistics. Once the raw data are gathered, All-Stations OTP is calculated in almost exactly the same way as Endpoint OTP. Calculating the All-Stations OTP percentage is a simple matter of adding together all the on-time station arrivals and dividing by the total number of station arrivals. The only difference is that there are more stations involved in the calculations than with Endpoint OTP. Given that it involves a mere arithmetic calculation, All-Stations OTP is neither a complicated nor burdensome calculation for PRIIA 213 purposes.

In fact, All-Stations OTP as proposed by Amtrak is simpler to calculate and apply than Endpoint OTP as envisioned in the Proposed Rule in one significant respect. The Proposed Rule would vary the tolerance from scheduled arrival time by the length of the route.⁷ Not only does this introduce a complicating factor into the calculation, but it would be difficult for the travelling public to understand

⁷ The Proposed Rule would calculate Endpoint OTP in a way that differs from Amtrak’s methodology for calculating this metric. The Proposed Rule uses different tolerances, and cancelled or truncated trains would be handled differently. The Proposed Rule therefore creates an entirely new metric with no published historical statistics.

or even be aware that their arrival time may not be taken into account at all in evaluating the performance of the train – and if it is, it will be based on the total length of the train’s route regardless of the total length of their own trip. On the other hand, All-Stations OTP applies a consistent 15-minute tolerance at all stations. This not only tracks the Congressional goal of arrival at all station stops within 15 minutes as expressed in 49 USC § 24101(c), discussed above, but makes the calculation simple and consistent: “on time” always means arrival within 15 minutes of scheduled time at every station.

F. For Purposes of Analyzing On-Time Performance Generally in a PRIIA 213 Investigation, All-Stations OTP Should Be Included as a Relevant Measure of Performance

The discussion above relates to Amtrak’s proposal for the definition of “on-time performance” in assessing whether a train’s on-time performance has fallen below 80% for two consecutive quarters and whether a PRIIA 213 investigation should therefore be commenced.⁸ It is unclear from the Proposed Rule whether the Board was also proposing how to define the term “on-time performance” for the purpose of the investigation itself; *i.e.*, the portion of PRIIA 213 which provides:

In making its determination or carrying out such investigation, the Board shall obtain information from all parties involved and identify reasonable measures and make recommendations to improve the service, quality, and on-time performance of the train.

To the extent the Board intends the Proposed Rule to define “on-time performance” for purposes of its review and recommendations within the investigation itself, Amtrak submits that, for the reasons stated above, a definition limited to Endpoint OTP would be in conflict with statutory language and ICC precedent and would have the limitations in relevant and necessary data already discussed, and is therefore inappropriate.

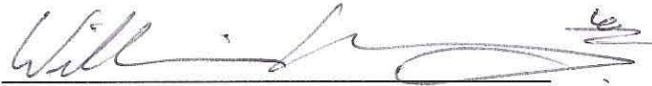
⁸ It should be noted that in several places the Decision refers to the fact that, if the “on-time performance” trigger is met, certain stakeholders may “request” that the Board initiate an investigation. *See, e.g.*, Decision at 3, 6. It should be noted that PRIIA 213 provides that “upon the filing of a complaint by Amtrak [or other specified parties], the Board **shall** initiate such an investigation....” (Emphasis added)

G. Conclusion

In enacting PRIIA 213, Congress entrusted the Board to initiate investigations to inquire into substandard on-time performance of Amtrak trains. Congress had already set a goal for Amtrak performance that involved arriving on time at *all stations* on a route, not just the endpoint; and the ICC itself recognized, in its *Adequacy of Service* regulations, that the travelling public must be able to rely on published schedules at intermediate stops and not just the one, final station on a route. Because only All-Stations OTP measures performance affecting the majority of Amtrak passengers at the vast majority of Amtrak stations, and because measuring All-Stations OTP is a simple and straightforward arithmetic calculation, there is no logical or practical reason to depart from the more established All-Stations OTP calculation in favor of Endpoint OTP.

Amtrak therefore respectfully submits that the Board's final rule implement All-Stations OTP as the calculation by which to measure whether an investigation should be triggered under PRIIA 213.

Respectfully submitted,



William H. Herrmann
Vice President and Managing Deputy General Counsel
National Railroad Passenger Service Corporation

Dated: February 8, 2016

EXHIBIT 1

Endpoints

California
 Auburn
 Bakersfield
 Emeryville*
 Goleta*
 Los Angeles*
 Oakland*
 Sacramento*
 San Diego-Downtown
 San Jose*
 San Luis Obispo*

Connecticut
 New Haven*

District of Columbia
 Washington*

Florida
 Miami
 Sanford

Georgia
 Savannah*

Illinois
 Carbondale*
 Chicago
 Quincy

Indiana
 Indianapolis*

Louisiana
 New Orleans

Maine
 Brunswick
 Portland*

Massachusetts
 Boston-So. Station
 Springfield*

Michigan
 Grand Rapids
 Pontiac
 Port Huron

Missouri
 Kansas City*
 St. Louis*

New York
 Albany-Rensselaer*
 New York*
 Niagara Falls*

North Carolina
 Charlotte*
 Raleigh*

Oklahoma
 Oklahoma City

Oregon
 Eugene-Springfield*
 Portland*

Pennsylvania
 Harrisburg*
 Philadelphia-30th St*
 Pittsburgh*

Texas
 Fort Worth*
 San Antonio*

Virginia
 Lorton
 Lynchburg*
 Newport News
 Norfolk
 Richmond-Staples Mill*

Vermont
 Rutland
 St.Albans

Washington
 Seattle*

Wisconsin
 Milwaukee*

Alabama
 Anniston
 Birmingham
 Tuscaloosa

Arizona
 Benson
 Flagstaff
 Kingman
 Maricopa
 Tucson
 Williams Jct.

Arkansas
 Arkadelphia
 Hope
 Little Rock
 Malvern
 Texarkana
 Walnut Ridge

California
 Anaheim
 Antioch-Pittsburg
 Barstow
 Berkeley
 Burbank
 Camarillo
 Carlsbad-Poinsettia
 Carlsbad-Village
 Carpinteria
 Chatsworth
 Chico
 Colfax
 Corcoran
 Davis
 Dunsmuir
 Encinitas
 Fremont
 Fresno
 Fullerton
 Glendale
 Guadalupe-Santa Maria
 Hanford
 Hayward
 Irvine
 Lodi
 Lompoc-Surf
 Madera
 Martinez
 Merced
 Modesto
 Moorpark
 Needles
 Oceanside
 Ontario
 Oxnard
 Palm Springs
 Paso Robles
 Pomona
 Redding
 Richmond
 Riverside
 Rocklin
 Roseville
 Salinas
 San Bernardino
 San Clemente Pier
 San Diego-Old Town
 San Juan Capistrano
 Santa Ana
 Santa Barbara
 Santa Clara-Great America
 Santa Clara-University

California Con't
 Simi Valley
 Solana Beach
 Sorrento Valley
 Stockton
 Suisun-Fairfield
 Truckee
 Turlock-Denair
 Van Nuys
 Ventura
 Victorville
 Wasco

Colorado
 Denver
 Fort Morgan
 Glenwood Springs
 Granby
 Grand Junction
 La Junta
 Lamar
 Trinidad
 Winter Park/Fraser

Connecticut
 Berlin
 Bridgeport
 Hartford
 Meriden
 Mystic
 New London
 Old Saybrook
 Stamford
 Wallingford
 Windsor
 Windsor Locks

Delaware
 Newark
 Wilmington

Florida
 Deerfield Beach
 Deland
 Delray Beach
 Fort Lauderdale
 Hollywood
 Jacksonville
 Kissimmee
 Lakeland
 Okeechobee
 Orlando
 Palatka
 Sebring
 Tampa
 West Palm Beach
 Winter Haven

Georgia
 Atlanta
 Gainesville
 Jesup
 Toccoa

Idaho
 Sandpoint

Illinois
 Alton
 Bloomington-Normal
 Carlinville
 Centralia
 Campaign-Urbana
 Du Quoin
 Dwight
 Effingham
 Galesburg
 Gilman
 Glenview
 Homewood

Illinois Con't
 Joliet
 Kankakee
 Kewanee
 La Grange Road
 Lincoln
 Macomb
 Mattoon
 Mendota
 Naperville
 Plano
 Pontiac
 Princeton
 Rantoul
 Springfield
 Summit

Indiana
 Connersville
 Crawfordsville
 Dyer
 Elkhart
 Hammond-Whiting
 Lafayette
 Michigan City
 Rensselaer
 South Bend
 Waterloo

Iowa
 Burlington
 Creston
 Fort Madison
 Mount Pleasant
 Osceola
 Ottumwa

Kansas
 Dodge City
 Garden City
 Hutchinson
 Lawrence
 Newton
 Topeka

Kentucky
 Ashland
 Fulton
 Maysville
 So Shore-So Portsmouth

Louisiana
 Hammond
 Orlando
 Lafayette
 Lake Charles
 New Iberia
 Schriever
 Slidell

Maine
 Freeport
 Saco
 Wells
 Old Orchard Beach

Maryland
 Aberdeen
 Baltimore
 BWI Airport
 Cumberland
 New Carrollton
 Rockville

Massachusetts
 Framingham
 Greenfield
 Haverhill
 Holyoke
 Northampton
 Pittsfield
 Woburn

Massachusetts Cont'd
 Worcester

Michigan
 Albion
 Ann Arbor
 Bangor
 Battle Creek
 Dearborn
 Detroit
 Dowagiac
 Durand
 East Lansing
 Flint
 Holland
 Jackson
 Kalamazoo
 Lanpeer
 New Buffalo
 Niles
 Royal Oak
 St. Joseph
 Troy

Minnesota
 Detroit Lakes
 Red Wing
 St. Cloud
 St. Paul-Minneapolis
 Staples
 Winona

Mississippi
 Brookhaven
 Greenwood
 Hattiesburg
 Hazlehurst
 Jackson
 Laurel
 McComb
 Meridian
 Picayune
 Yazoo City

Missouri
 Hermann
 Independence
 Jefferson City
 Kirkswood
 La Plata
 Lee's Summit
 Poplar Bluff
 Sedalia
 Warrensburg
 Washington

Montana
 Browning
 Cut Bank
 East Glacier Park
 Essex
 Glasgow
 Havre
 Libby
 Malta
 Shelby
 West Glacier
 Whitefish
 Wolf Point

Nebraska
 Hastings
 Holdrege
 Lincoln
 McCook
 Omaha

Nevada
 Elko
 Reno
 Winnemucca

New Hampshire
 Claremont
 Dover
 Durham
 Exeter

New Jersey
 Metropark (Iselin)
 New Brunswick
 Newark
 Newark Int'l Airport
 Princeton Jct
 Trenton

New Mexico
 Albuquerque
 Deming
 Gallup
 Lamy
 Las Vegas
 Lordsburg
 Raton

New York
 Amsterdam
 Buffalo-Exchange St.
 Buffalo-Depew
 Croton-Harmon
 Ft Edward-Glens Falls
 Hudson
 New Rochelle
 New York State Fair
 Plattsburgh
 Port Henry
 Poughkeepsie
 Rouses Point
 Rhinecliff
 Rochester
 Rome
 Saratoga Springs
 Schenectady
 Syracuse
 Ticonderoga
 Utica
 Westport
 Whitehall
 Yonkers

North Carolina
 Burlington
 Cary
 Durham
 Fayetteville
 Gastonia
 Greensboro
 Hamlet
 High Point
 Kannapolis
 Lexington
 NC State Fair
 Rocky Mount
 Salisbury
 Selma
 Southern Pines
 Wilson

North Dakota
 Devils Lake
 Fargo
 Grand Forks
 Minot
 Rugby
 Stanley
 Williston

Ohio
 Alliance
 Bryan
 Cincinnati
 Cleveland
 Elyria
 Sandusky
 Toledo

Oklahoma
 Ardmore
 Norman
 Pauls Valley
 Purcell

Oregon
 Albany
 Chemult
 Eugene
 Klamath Falls
 Oregon City
 Salem

Pennsylvania
 Altoona
 Ardmore
 Coatesville
 Connellsville
 Cornwells Heights
 Downingtown
 Elizabethtown
 Erie
 Exton
 Greensburg
 Huntingdon
 Johnstown
 Lancaster
 Latrobe
 Lewistown
 Middletown
 Mount Joy
 Paoli
 Parkersburg
 Philadelphia (North)
 Tyrone

Rhode Island
 Kingston
 Providence
 Westerly

South Carolina
 Camden
 Charleston
 Clemson
 Columbia
 Denmark
 Dillon
 Florence
 Greenville
 Kingstree
 Spartanburg
 Yemassee

Tennessee
 Memphis
 Newbern-Dyersburg

Texas
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 Cleburne
 Dallas
 Del Rio
 El Paso
 Gainesville
 Houston
 Longview
 Marshall
 McGregor
 Mineola

Texas Cont'd
 San Marcos
 Sanderson
 Taylor
 Temple

Utah
 Green River
 Helper
 Provo
 Salt Lake City

Vermont
 Bellows Falls
 Brattleboro
 Castleton
 Essex Junction
 Montpelier-Berlin
 Randolph
 Waterbury
 White River Jct
 Windsor

Virginia
 Alexandria
 Ashland
 Burke Centre
 Charlottesville
 Clifton Forge
 Culpeper
 Danville
 Fredericksburg
 Manassas
 Petersburg
 Quantico
 Richmond (Main St.)
 Staunton
 Williamsburg
 Woodbridge

Washington
 Bellingham
 Bingen-White Salmon
 Centralia
 Edmonds
 Ephrata
 Everett
 Kelso-Longview
 Leavenworth
 Mount Vernon
 Olympia-Lacey
 Pasco
 Spokane
 Stanwood
 Tacoma
 Tukwila
 Vancouver
 Wenatchee
 Wishram

West Virginia
 Alderson
 Charleston
 Harpers Ferry
 Hinton
 Huntington
 Martinsburg
 Montgomery
 Prince
 Thurmond
 White Sulphur Springs

Wisconsin
 Columbus
 La Crosse
 Milwaukee Airport
 Portage
 Sturtevant
 Tomah
 Wisconsin Dells

*Indicates stations that are endpoints for only certain trains arriving at these stations. Other trains would not be measured at these stations.

EXHIBIT 2

Amtrak Passengers Detraining at Endpoint Station vs. Intermediate Stations
January through December 2015

Systemwide total	10,894,935	19,578,640	30,473,575	35.8%	64.2%
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Service	Total Passengers Detraining at Endpoint Station	Total Passengers Detraining at Intermediate Stations	Total Service Ridership	% of Passengers Detraining at Endpoint station	% of Passengers Detraining at Intermediate stations
Acela Express	1,289,692	2,169,705	3,459,397	37.3%	62.7%
Adirondack	119,497	75,568	195,065	61.3%	38.7%
All Other Northeast Regional	1,900,931	3,146,606	5,047,537	37.7%	62.3%
Auto Train	263,886	-	263,886	100.0%	0.0%
Blue Water	94,365	85,351	179,716	52.5%	47.5%
California Zephyr	86,852	292,261	379,113	22.9%	77.1%
Capitol Limited	127,085	98,282	225,367	56.4%	43.6%
Capitols	459,854	1,027,337	1,487,191	30.9%	69.1%
Cardinal	31,131	72,148	103,279	30.1%	69.9%
Carl Sandburg / Illinois Zephyr	98,439	107,495	205,934	47.8%	52.2%
Carolinian	62,316	288,761	351,077	17.7%	82.3%
Cascades	383,202	359,135	742,337	51.6%	48.4%
City of New Orleans	115,474	140,552	256,026	45.1%	54.9%
Coast Starlight	92,094	361,516	453,610	20.3%	79.7%
Crescent	68,875	212,933	281,808	24.4%	75.6%
Downeaster	211,957	212,303	424,260	50.0%	50.0%
Empire Builder	131,368	312,760	444,128	29.6%	70.4%
Ethan Allen Express	68,180	85,346	153,526	44.4%	55.6%
Heartland Flyer	49,798	16,437	66,235	75.2%	24.8%
Hiawatha	650,359	145,960	796,319	81.7%	18.3%
Hoosier State	20,060	8,607	28,667	70.0%	30.0%
Illini / Saluki	147,568	132,634	280,202	52.7%	47.3%
Keystone	759,020	1,298,419	2,057,439	36.9%	63.1%
Lake Shore Ltd	138,227	224,226	362,453	38.1%	61.9%
Lincoln Service	288,053	241,907	529,960	54.4%	45.6%
Lynchburg	91,950	525,905	617,855	14.9%	85.1%
Missouri	75,490	100,650	176,140	42.9%	57.1%
New York - Albany	595,739	175,464	771,203	77.2%	22.8%
New York - Niagara Falls / Toronto	227,180	380,061	607,241	37.4%	62.6%
Pacific Surfliner	656,229	2,175,241	2,831,470	23.2%	76.8%
Palmetto	40,048	196,254	236,302	16.9%	83.1%
Pennsylvanian	117,309	183,814	301,123	39.0%	61.0%
Pere Marquette	64,764	26,247	91,011	71.2%	28.8%
Piedmont	67,570	89,555	157,125	43.0%	57.0%
Richmond / Newport News / Norfolk	399,715	2,176,701	2,576,416	15.5%	84.5%
San Joaquins	334,353	826,390	1,160,743	28.8%	71.2%
Silver Meteor	65,934	274,719	340,653	19.4%	80.6%
Silver Star	43,002	326,075	369,077	11.7%	88.3%
Southwest Chief	128,814	237,263	366,077	35.2%	64.8%
Sunset Limited	36,639	62,699	99,338	36.9%	63.1%
Texas Eagle	46,085	132,036	178,121	25.9%	74.1%
Vermont	52,268	308,228	360,496	14.5%	85.5%
Wolverine	193,563	265,089	458,652	42.2%	57.8%

EXHIBIT 3

***States that are served by Amtrak trains but have no stations where Endpoint OTP reporting would occur –
24 of 46 states (or 52%):***

Alabama	Arizona
Colorado	Delaware
Idaho	Kansas
Iowa	Maryland
Kentucky	Mississippi
Minnesota	Nebraska
Montana	New Hampshire
Nevada	New Mexico
New Jersey	Ohio
North Dakota	South Carolina
Rhode Island	Utah
Tennessee	West Virginia

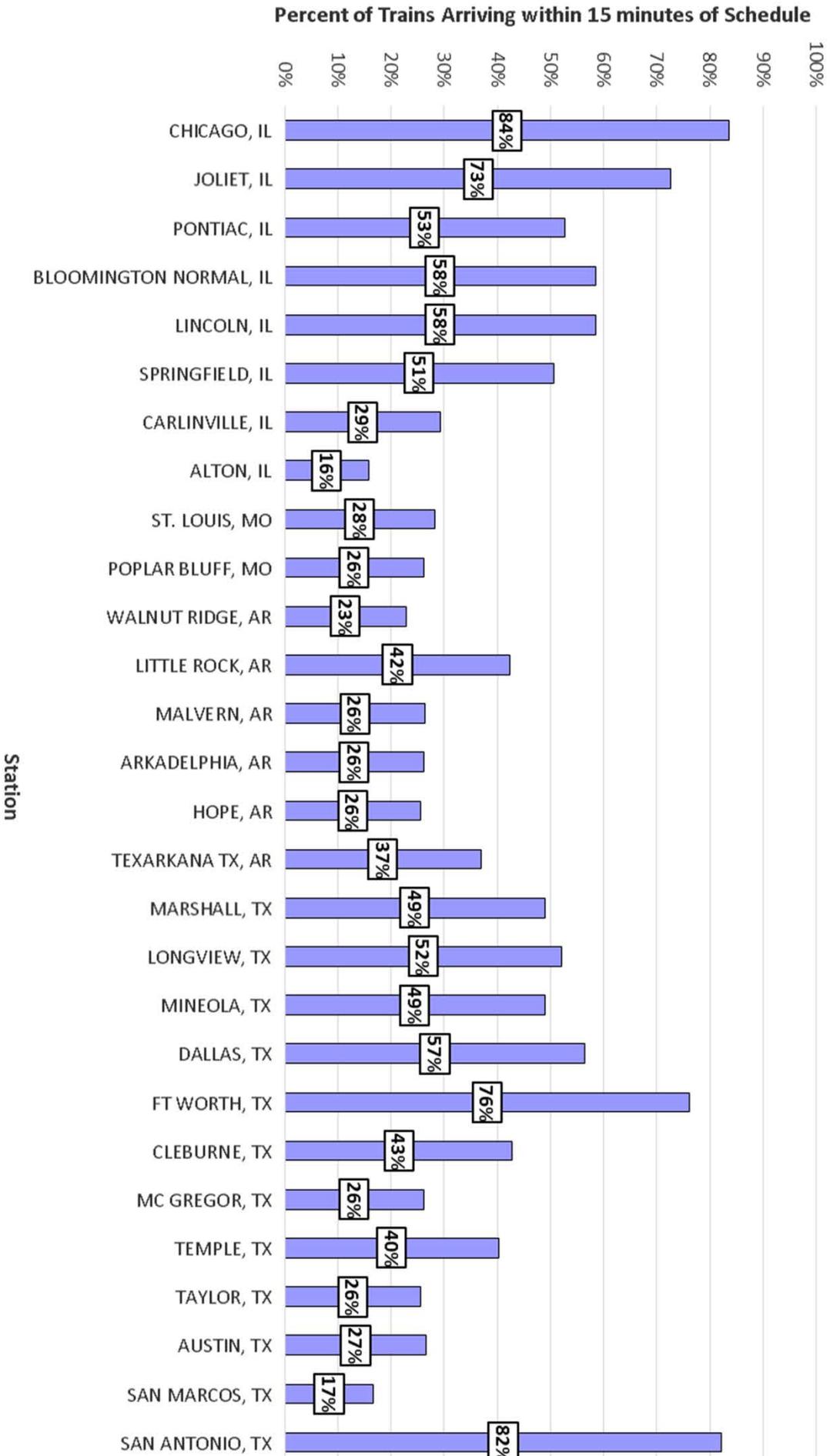
EXHIBIT 4

Performance by Station Exhibits



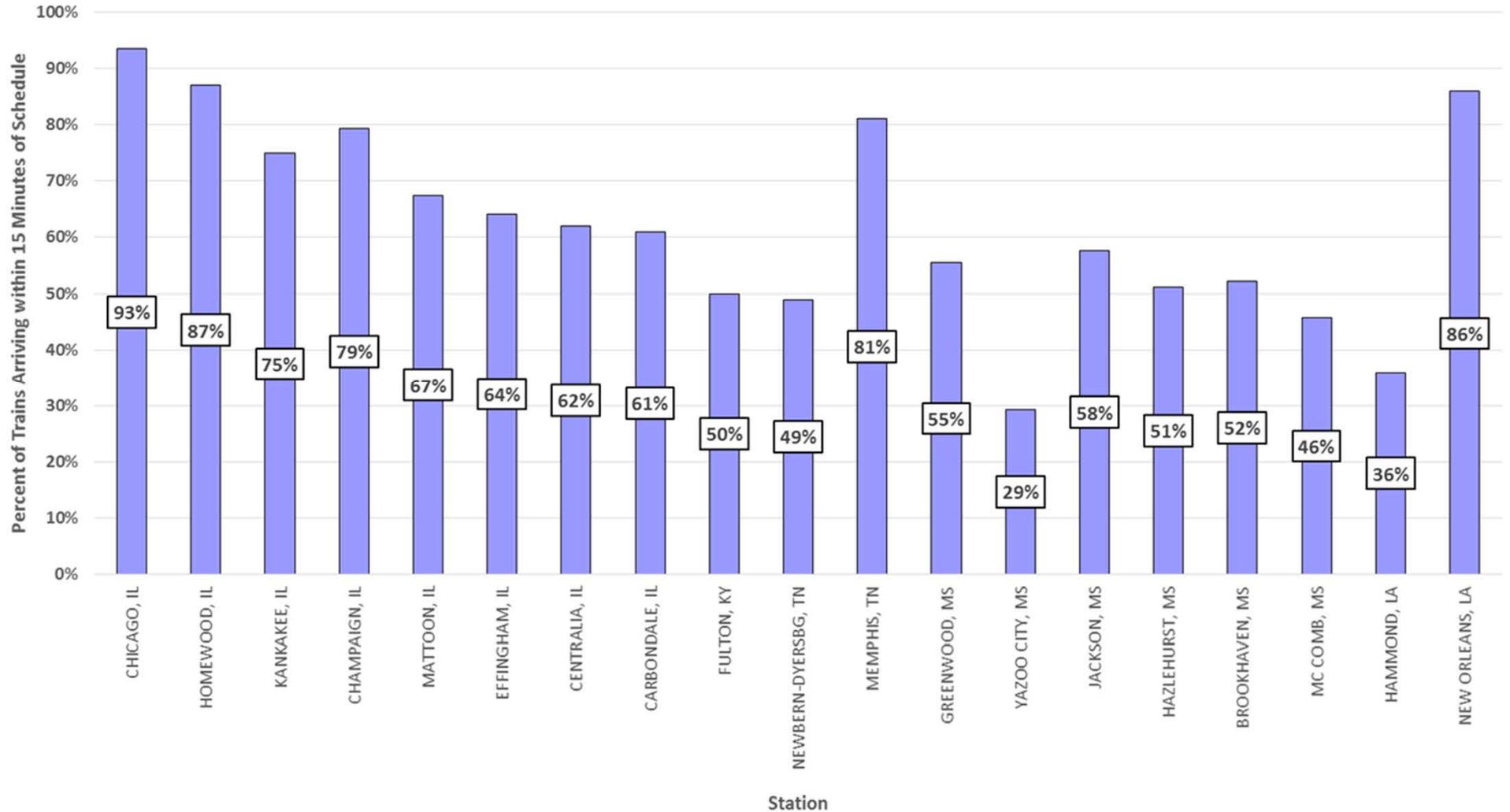
Performance by Station - Texas Eagle Train 21 FY13 Q4

80% of Passengers Detained at Intermediate Stations, a total of 24,402 Passengers



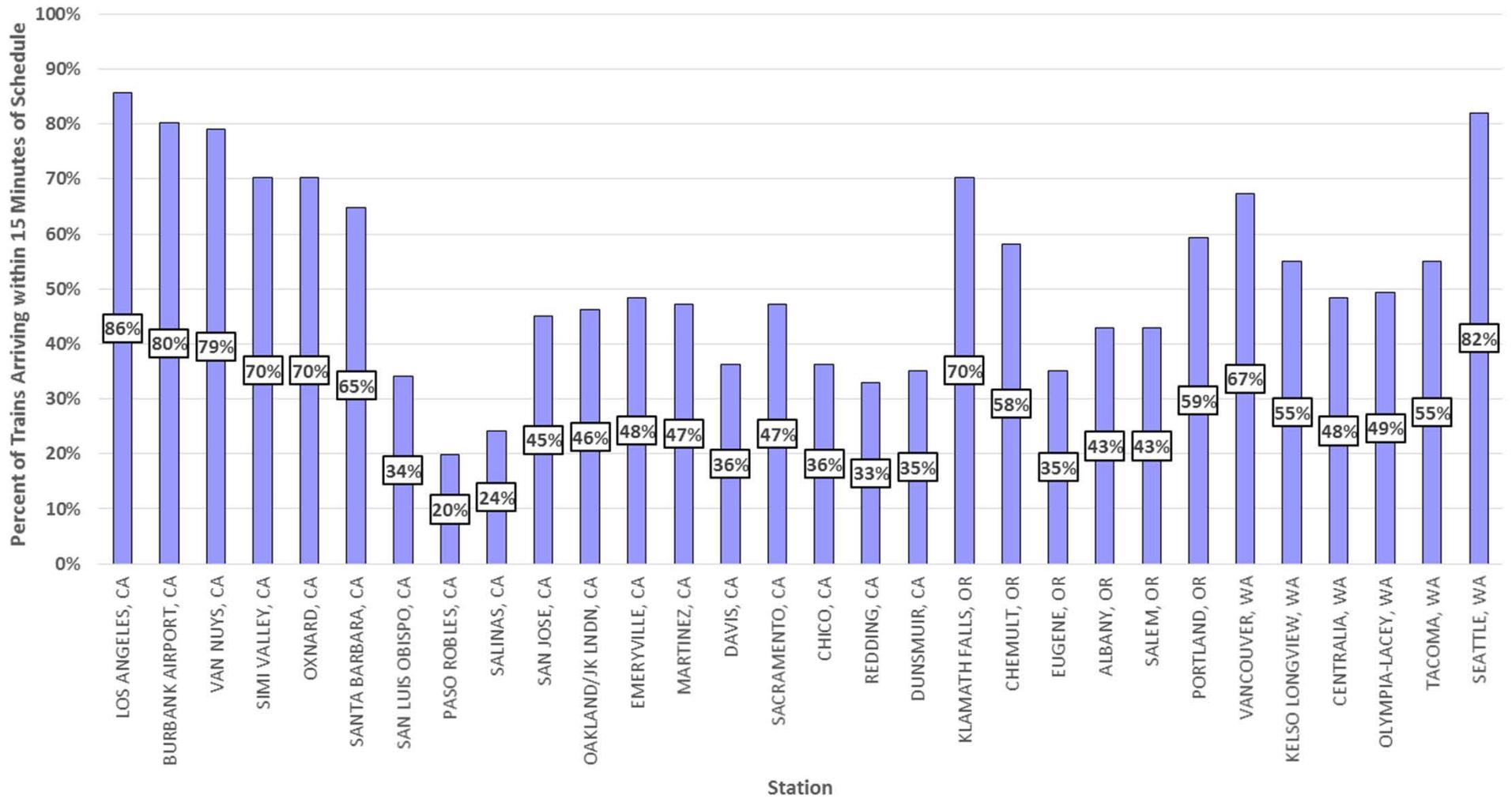
Performance by Station- City of New Orleans Train 59 FY15 Q4

63% of Passengers Detained at Intermediate Stations, a total of 21,246 Passengers



Performance by Station- Coast Starlight Train 14 FY15 Q3

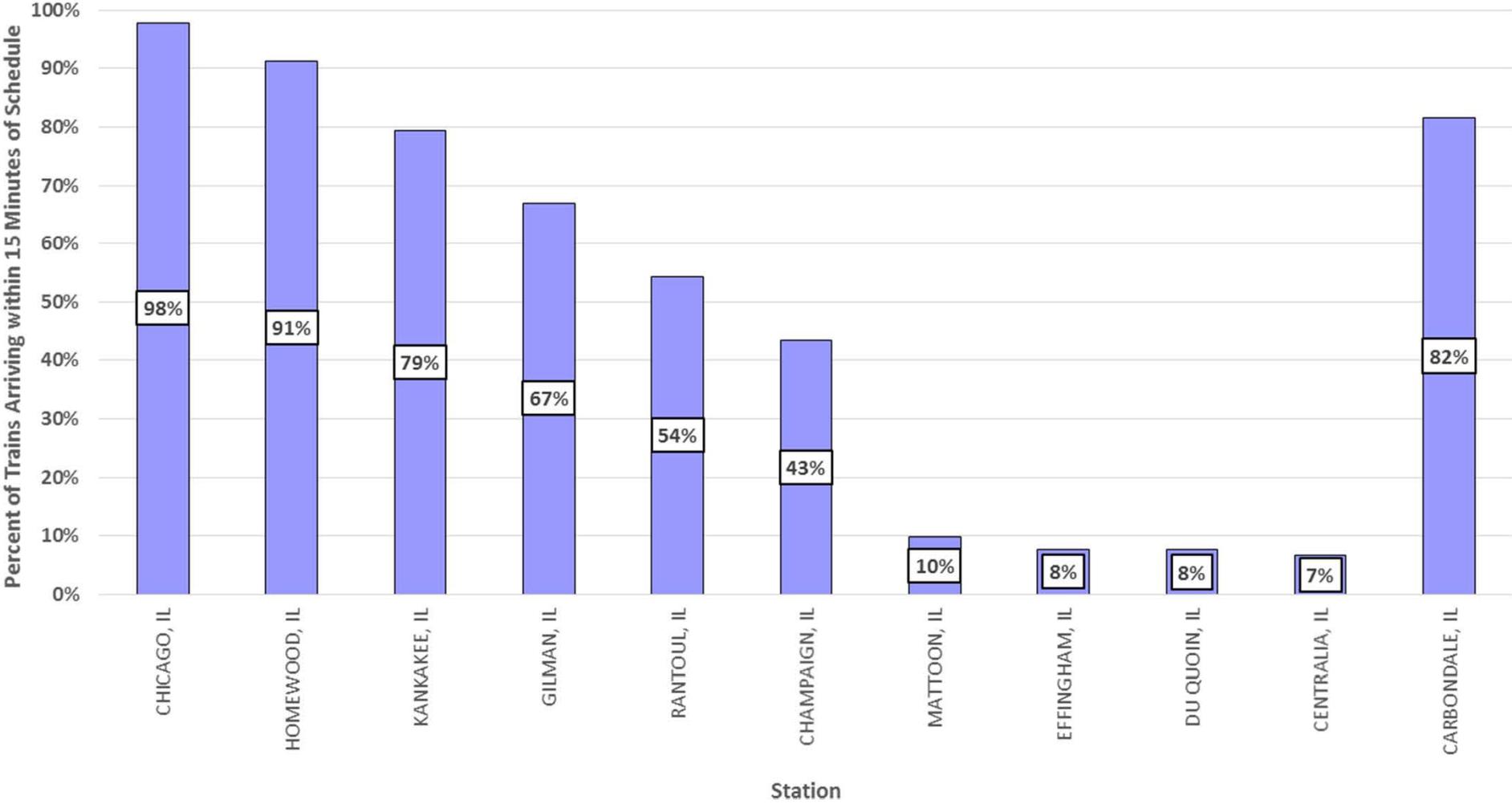
80% of Passengers Detrained at Intermediate Stations, a total of 46,011 Passengers



Performance by Station- Illini Saluki Train 393

FY13 Q1

70% of Passengers Detrained at Intermediate Stations, a total of 16,583 Passengers



Performance by Station- Blue Water Train 364

FY15 Q3

87% of Passengers Detrained at Intermediate Stations, a total of 18,154 Passengers

