



## NATIONAL ASSOCIATION OF RAILROAD PASSENGERS

TRAINS: A TRAVEL CHOICE AMERICANS WANT

The Honorable Joseph Szabo  
Administrator  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

July 10, 2009

RE: Interim Guidance for High Speed Intercity Passenger Rail Program [Docket No. FRA-2009-0045]

Mr. Szabo,

The National Association of Railroad Passengers congratulates the FRA's on its work reflected in the interim guidance.

We particularly note with approval FRA's recognition of the many public benefits that flow from intercity passenger train development, including "promoting livable communities" (page 41).

Equally important is the identification of "avoiding reductions in State-provided essential services" as a key factor "to be considered in assigning a rating" to an application (page 41). Building on this idea, U.S. DOT must play a major leadership role in seeing that *all* existing services survive the current economic downturn in spite of budgetary problems in many states.

The "transportation benefits" section includes this phrase: "Generating improvements to Intercity Passenger Rail service, as reflected by estimated increases in ridership (as measured in passenger-miles)..." (page 40).

NARP has long emphasized "passenger-miles" (one passenger traveling one mile) as a key measure of intercity service, one that is standard in the airline industry but too often neglected in discussions of Amtrak. Thus, we agree with the use of passenger-miles. *However, please consider replacing the word "ridership" with "usage" in the above-quoted passage, since "ridership" and "passenger-miles" are different measures whereas "usage" is a generic term that seems to fit in the sentence more logically.*

We also appreciate the attention to both incremental improvements and potential all-new railroads (such as the one planned in California); this ensures that every part of the nation is eligible to receive the benefits of passenger trains. We encourage you to keep promoting standardized equipment and rolling stock to the extent feasible, both to lower costs nationwide and to lay the groundwork for a vibrant train-based manufacturing sector domestically.

Finally, we applaud the three week deadline that the HSIPR interim guidelines provided; while it set an aggressive deadline for both the state transportation and FRA staffs, we believe it appropriately balances the need to get the program going with the provision of specific guidance where necessary, and will improve the quality of the applications you receive. The U.S DOT must continue to persistently act as a facilitator for significant rail projects across the nation.

Respectfully,

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