

April 22, 2020

Mr. Ronald Batory
Administrator
Federal Railroad Administration
U.S. Dept. of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Docket FRA-2019-0069 Comment Re: Metrics and Minimum Standards for Intercity Passenger Rail Service

Dear Administrator Batory:

The *Rail Passengers Association* very much welcomes the opportunity to comment on the proposed Rule defining Metrics and Minimum Standards for Intercity Passenger Rail Service ("the Rule"). We write to share our endorsement of the Rule's goals and objectives on behalf of our tens of thousands of members nationwide, and to applaud the Dept. of Transportation, the Federal Railroad Administration and Amtrak for its proactive stance to work closely with our team and with other stakeholders to develop a set of standards that will not only improve the passenger experience but simultaneously make railroad operations of all kinds better and more efficient.

Founded in 1969 as the National Association of Railroad Passengers, *Rail Passengers* is the oldest and largest national organization speaking for the more than 40 million rail passengers in the U.S. Our mission is to improve and expand intercity, regional and urban passenger train services, to support higher speed rail initiatives, to increase connectivity among all forms of transportation and to ensure safety for our country's trains and passengers. We work with all levels of government – Federal, state, local and tribal. This makes communities safer, more accessible and more productive, improving the lives of everyone who lives, works and plays in towns all across America.

Our Association met with Amtrak and FRA representatives last summer to supply our input to this proposed Rule, as well as contributing supplemental information in a series of follow-up phone calls and email exchanges. As proposed, the Rule broadly reflects much of our passenger-centric input. We were especially pleased that the proposed Rule includes a single unambiguous customer-facing on-time standard, quarterly reports on customer-service performance on important items such as cleanliness and food service, and financial performance measured and published against both the PRIIA-required Avoidable Costs standard and the existing Fully Allocated Costs methodology.

Nonetheless, we believe that an even more bold approach could yield real dividends not only for passengers but for railroading as a whole. Our detailed comments are intended to strengthen an already-laudable proposed Rule to incorporate more transparency on passenger operations and more effort to

measure the financial benefits of service to individual communities, especially those smaller rural communities that are underserved.

We begin with an overview of our overall position on the Rule's utility and purpose, and we then offer specific section-by-section changes or additions. In summary, *Rail Passengers* endorses the OTP standard as proposed and strongly urges that the OTP standard and transparency measures remain unaltered in the Final Rule. *Rail Passengers* further recommends strengthening the Rule's provisions and information-gathering related to passengers with disabilities or special needs.

Rail Passengers also responds here to FRA's request to identify potential quantitative metrics that evaluate the customer experience without relying on a survey score, proposing metrics in six areas: Mishandled Bags, Denied Boardings or Changes in Class of Service, Consumer Complaints, Special-Needs Passengers, ADA Passengers and Cash Passengers.

UTILITY, PURPOSE AND EFFECTIVENESS

Customer OTP Benefits Everyone

The Metrics and Minimum Standards as published will go a long way toward improving the experience of the American passenger along with anyone else who relies on rail. The proposed Customer On-Time Performance (Customer OTP) standard is passenger-focused, unambiguous, straightforward and easy to understand.

Late trains are the single most significant cause of passenger dissatisfaction. Our Association recognizes that late trains stem from a complex mix of causes. However, we also know that a crucial issue contributing to freight-caused delays of passenger trains is the lack of capacity, along with the industry's increasing adoption of the principles of so-called "precision railroading." Shippers have testified at length before the Surface Transportation Board about the degree to which "precision" railroading has turned out to be anything but. *Rail Passengers* believes that the proposed Rule will encourage more disciplined operation for host railroads, promoting fluidity, speed and reliability for all users. Amtrak passengers are not the only users who benefit from a fluid and reliable railroad – commuters, shippers and end-use customers all want, and deserve, nothing less. While we are sympathetic to the host railroads' challenges, the fact remains that our members rely on, and pay for, timely and regular service on those routes, whether riding as an Amtrak passenger or as a daily commuter on systems all across the country like Metra or MARC.

For our members, many irreplaceable personal moments have been disrupted by lengthy freight-interference delays, with crucial medical transports affected, weddings and funerals missed and rare home visits by deployed service-members cut short or even cancelled altogether. Each of these hundreds of stories – and we have supplied more than 1,300 of them to the Surface Transportation Board – add up to more than mere temporary inconvenience and in many cases impose real dollar costs on vulnerable travelers.

It should be obvious, but it bears repeating. Late trains interact with other trains, so improvements will benefit all operations, freight, intercity passenger rail and commuter. Consider this example from Texas: Amtrak's *Texas Eagle*, operating for 30 of its 1,300 route miles on tracks between Dallas and Fort Worth owned and dispatched by commuter operator Trinity Rail Express (TRE). The *Eagle* is delayed on host railroads hundreds of miles away, which results in the train routinely arriving on TRE territory late. In

March of this year, the *Eagle* reached TRE territory on schedule only 8% of the time. This ripples throughout the system, delaying TRE passengers as well as Amtrak's *Eagle* passengers.

Schedule Recovery Time Should Be Redistributed, Rather Than Lengthening Schedules

Rail Passengers also endorses the discussion in the proposed Rule's preamble about the need to adjust recovery time. We concur with FRA that in some cases Amtrak's current timetables don't match up to a steady-state 80% OTP as proposed, and we agree that Amtrak will need to adjust timetables as a result, primarily through re-distributing the recovery "padding" throughout the route and also by modifying published schedules when conditions change, either temporarily or permanently. Even so, we are cautious that these adjustments are not used to lengthen already lengthy journey times on many routes. This is especially important given the number of investments that have been made in recent years on certain rights-of-way to improve ride quality and speed.

Americans are looking for more trains, better trains and faster trains all across the country, and we will be watching closely to see whether Class I host railroads default to simply extending schedules rather than negotiating redistribution of schedule "pad" in good faith with Amtrak.

Financial Transparency Is Vital

Our Association strongly endorses the proposed Rule's provisions to publish, quarterly, important financial metrics for passenger-rail service. We are especially pleased with the Rule's plan to publish route results using both the Fully Allocated Costs and Avoidable Costs methodologies side-by-side. We continue to believe that the Fully Allocated Costs method substantially misstates the economics of many routes. Publishing route results using both methods should offer insight into the real cost of operating our interstate passenger-rail system and help to highlight the benefits it brings to the people and the communities it serves.

Broad Public Benefits Reporting Will Enable Better Policy Decisionmaking

The benefits to the wider public of reliable, safe and frequent passenger rail service are numerous and substantial. Up to now, members of the public hoping to understand the value of rail service generally – and especially of rail service in their own community – have had to rely on ad hoc analyses. *Rail Passengers* stepped in to fill this gap in the summer of 2018, modifying and refining a model initially developed with the University of Southern Mississippi's Trent Lott Center to look beyond typical Benefit/Cost analysis to more fully capture the value of service to served communities. Our model accounts for potential economic gains from tourism, construction, operations and other investments, all of which combine to create benefits to the communities, the states and the Nation as a whole.

Rail Passengers applauds the FRA for working to include a measure of Public Benefit, particularly to smaller and less well-served communities. In the Section-by-Section analysis that follows, we make specific recommendations to enhance the Public Benefits analysis. We also stand ready to employ our economics-benefit model to assist FRA in these efforts.

SECTION-BY-SECTION ANALYSIS AND RECOMMENDATIONS

Rail Passengers' section-by-section analysis and specific recommendations follow. These recommendations include extensive and substantive changes to the Customer Satisfaction Index (CSI) survey instrument to better capture the needs of disabled and special-needs travelers and rural travelers. We also make significant recommendations to enhance the measurement of Public Benefits of rail service.

Section 273.1 - Definitions

"This section proposes to define the term 'passenger revenue' to mean intercity passenger rail revenue generated from passenger train operations, including ticket revenue, food and beverage sales, operating payments collected from States or other sponsoring entities, special trains, and private car operations."

Rail Passengers Comment: We endorse this definition. When considering the format of the eventual quarterly public reports, *Rail Passengers* hopes to see these categories broken out rather than simply rolled up into a broad "passenger revenue" category. This is similar to what airlines must already report through the Form 41 regulatory process. Based on Section 279.3(c) of the proposed rule, it appears that FRA's intent is to delineate between State-supported and other revenues, but we recommend that the other categories identified in 273.1 above are also explicitly broken out and reported.

Section 273.5 On Time Performance and Train Delays

Rail Passengers Comment: Rail Passengers was pleased to see the Customer OTP definition, consistent with the statute and which we supported in our written submissions to FRA and our in-person meetings with Amtrak and FRA, reflected in paragraphs (a)(1) and (a)(2). We strongly urge that these definitions remain unaltered in the Final Rule.

Section 273.7 - Customer Satisfaction

Rail Passengers Comment - Discussion: The market-research survey included in the docket is the primary instrument for gathering information needed to calculate the Customer Satisfaction Index. Although comprehensive, there are two glaring omissions: one, there are no questions assessing accessibility concerns for disabled or elderly passengers, either on board trains or Amtrak-branded motor coaches, and, two, there is no meaningful attempt to understand why passengers choose one ticket-purchase method over another, which masks very significant differences stemming from disabilities or the rural/urban digital divide. Before describing our proposed changes to the CSI instrument reflecting these observations, a discussion about the characteristics of disabled and rural travelers will illuminate the basis of our recommendations.

When choosing a booking method, passengers are not merely expressing a preference. For those with certain kinds of disabilities one particular method may be the only practical choice. For certain traveling populations - the Amish, for example - online booking is not acceptable. Moreover, in rural areas the significant lack of Internet access and broadband service can make using online booking tools difficult or impossible. These are populations Amtrak must nonetheless serve and, in many cases, Amtrak is the only available public transportation for these populations.

The Pew Research Center reports that, despite steady improvements in the growth of rural broadband, roughly a third of rural Americans don't have a broadband internet connection at home.¹ Rural Americans are now 12 percentage points less likely than Americans overall to have home broadband. About a quarter of rural Americans report that they still have no access to high-speed Internet service.² Ten percent fewer rural Americans than suburbanites go online at least daily, and 15% of rural Americans never go online at all. Amtrak's recent push for more online bookings by diminishing call center staff, eliminating paper timetables and leaving rural stations unstaffed all disproportionately affect Amtrak's rural travelers.

Roughly 19% of Americans live in rural areas. That's 62 million people. A quarter of them are veterans, and another quarter are seniors over 65. Some 18% of Amtrak passengers travel to or from a rural station with no access to air service. About a quarter of the nation's elderly – whose physical conditions often make them outsize users of rail – live in rural America.

In 'Flyover Country,' 1.6 million people have neither a car nor access to public transit, shutting them off from life's necessities-jobs, fresh food, education and, most importantly, healthcare. Often, they need to travel great distances to VA hospitals or other centers for care unavailable in their hometowns. With its 15 long-distance routes connecting a series of state-supported services, Amtrak's National Network provides an essential transportation service to 40% of the nation's small and rural communities, establishing a vital link between Small Town and Big City America.

Despite these realities, not only do the questions on the CSI survey instrument skew toward urban and suburban travelers' needs and concerns, but the methodology itself potentially undercounts input from the rural population that currently travels on Amtrak because the surveys are completed via email. Whether because they are Amish, they live in areas with little broadband penetration or they are among that fraction of rural Americans that never goes online, the voices of those passengers not using online services do not even count in the calculation.

Rail Passengers' Proposed CSI Instrument Modifications

For the reasons detailed in the previous Discussion, Rail Passengers recommends adding other contact methods (postal mail and telephone) to the survey process, as well as recommending the following modifications to the CSI instrument:

Reservation

In the section headed *Reservation*, a question should be added to ascertain why a customer used a particular booking method (phone, in-person agent, website). The question could read as follows:

"Considering your answer to the question 3A above about how you made your travel arrangements, why did you choose that particular method?"

- 01-I find online booking to be easier, faster, or more convenient
- 02-I find speaking to an agent to be easier, faster, or more convenient
- 03-I do not have reliable access to a high-speed internet connection
- 04-I do not have a smartphone
- 05-I have vision impairments that make it difficult for me to book online

¹ Perrin, Andrew 'Digital Gap Between Rural and Nonrural America Persists' <https://www.pewresearch.org/fact-tank/2019/05/31/digital-gap-between-rural-and-nonrural-america-persists/>

² Anderson, Monica 'About A Quarter of Rural Americans Say Access to High-Speed Internet is a major problem' <https://www.pewresearch.org/fact-tank/2018/09/10/about-a-quarter-of-rural-americans-say-access-to-high-speed-internet-is-a-major-problem/>

06-I have hearing impairments that make it difficult for me to book on the phone

07-I do not carry a credit card

08-I have religious/cultural restrictions on how I book travel"

At the Boarding Station

In the section headed *At the Boarding Station*, item 9 ('Ease of train boarding process') should be modified to include an item 9A to read: "Ability to use my mobility-enhancing devices, such as wheelchairs, scooters or walkers"

On Board the Train

In the section headed *On Board the Train*, the list of items should be modified to include specific queries about disability access: "Accessibility of your seat if you are disabled or use a mobility-enhancing device", "Accessibility of your sleeping compartment if you are disabled or use a mobility-enhancing device"

In the food-and-beverage subsection in the section headed *On Board the Train*, item 31 ('Variety of food selections in the café/lounge car') should be modified to include an item 31A to read: "Food selections adequately responded to my medically or religiously necessary dietary restrictions"

At the Destination Station

In the section headed *At the Destination Station*, an item should be added: "Ability to use my mobility-enhancing devices, such as wheelchairs, scooters or walkers"

FRA-Requested Additional Input - Quantitative Metrics

FRA requested comments on whether the quarterly reports should include additional customer metrics with quantitative measurements not based on a survey score; *Rail Passengers* believes that they should. FRA should require quantitative metrics that evaluate the customer experience without relying on a survey score. We endorse the FRA's own examples in the proposed rule, such as a metric measuring time taken for the boarding process, time in line waiting for customer service at a station or time on hold waiting for customer service.

We also propose the following **six** additional quantitative measurements to be gathered and publicly reported:

Mishandled Bags

Rail Passengers proposes that the *Mishandled Bags* metric would measure the percentage of, and quarterly changes in, mishandled bags per 1,000 bags checked. The number of mishandled bags would include bags that are lost, damaged, delayed, and pilfered, as reported by or on behalf of the passenger, that were in Amtrak's custody for the duration of the passenger's journey, and would exclude bags that remained in the passenger's possession, either in coach or stored in a sleeper accommodation. Any bicycles, wheelchairs, scooters or mobility-enhancing devices, that were placed into the baggage car would be included in this measurement.

Denied Boarding/Oversales/Class of Service

Rail Passengers proposes that the *denied boarding/oversales/class of service* metric would measure the percentage of, and quarterly changes in, the absolute number of passengers who paid for a particular seat or class of service and did not receive it on board, by route. A typical example might be when a late train causes a missed connection to a train with a single daily frequency, and the booked class of service is not available on the next day's train. A second metric would report this figure

1967



1990



2011



2017



RAILPASSENGERS
ASSOCIATION

normalized to a rate per 10,000 passengers by route. This metric would apply only to Reserved classes of service and would exclude unreserved services and commuter services.

Consumer Complaints

Rail Passengers proposes that the *Consumer Complaints* metric would measure the percentage of, and quarterly changes in, the absolute number of consumer complaints by Amtrak station location. A second metric would report this figure normalized to a rate per 10,000 passengers by station. Complaints would be sorted into the same categories measured by the CSI instrument.

Disabled/Needing Assistance

Rail Passengers proposes that the *Disabled/Needing Assistance* metric would measure the percentage of, and quarterly changes in, paid ridership by route which self-identifies as "disabled or needing assistance" or requests special accommodation at the time of booking, regardless of the booking method used. This metric should include all special requests and not be limited to those requesting specific accommodation under the Americans with Disabilities Act (ADA).

ADA Ridership

Rail Passengers proposes that the *ADA Ridership* metric would measure the percentage of, and quarterly changes in, paid ridership using wheelchairs, powered wheelchairs, scooters or other mobility-enhancing devices by route.

Cash Passengers

Rail Passengers proposes that the *Cash Passengers* metric would measure the percentage of, and quarterly changes in, the percentage of riders using cash to pay for tickets by route and by origin station. Amtrak serves a significant portion of travelers who are "unbanked" or do not have access to a credit card, and changes in this metric would provide meaningful insight into the needs of this population.

Section 273.9 - Financials, para (c)

"Paragraph (c) of this section proposes that the fully allocated core operating costs covered by passenger revenue metric is the percent of fully allocated core operating costs divided by passenger revenue for each route, shown with and without State operating payments (Emphasis added). Fully allocated core operating costs include the fully loaded share of overhead-type costs that pertain to more than one route or to the company as a whole. Costs are limited to 'core' expenses (i.e., related to the provision of intercity passenger trains) to match expenses with passenger revenue."

Rail Passengers Comment: We very much welcome this provision. *Rail Passengers* remains critical of the Fully Allocated Costs method and shares the concerns of the Amtrak Office of Inspector General that costs measured this way neither reflect the underlying economics of a particular service nor provide the basis for projecting the effect on revenue and cost of service changes. Publishing both Avoidable Costs and Fully Allocated Costs alongside one another should offer insight into the real cost of operating our interstate passenger-rail system and help to highlight the benefits it brings to the people and the communities it serves. We urge that this provision remain in the Final rule.

Section 273.11 - Public Benefit

Rail Passengers Comment - Discussion: This section of the proposed rule represents the first meaningful attempt to capture and quantify the public benefits of Amtrak as a publicly supported enterprise, and *Rail Passengers* strongly supports the incorporation of Public Benefit goals and objectives into the statistical reporting. We believe that incorporating additional metrics will help FRA to fully capture the

1967



1990



2011



2017



RAILPASSENGERS
ASSOCIATION

value of rail service to the served communities in three specific areas - economic and station development, normalizing route reporting to better capture rural utility, and assessing the network effects of long-distance connections as "overlapping corridors."

Fully Capturing Economic Benefit - Economic and Station Development

In addition to the metrics already included in Section 273.11, *Rail Passengers* proposes an additional metric to assess the overall economic benefit of passenger rail service to each community, making explicit the link between the annual investment in a particular route and the quantifiable benefits each served community draws as a result.

The *Rail Passengers Association* has modified and enhanced an economic model originally developed with the University of Southern Mississippi's Trent Lott Center to measure the ways that passenger service supports local direct and indirect employment, local sales taxes and income taxes, tourism, and benefits from avoided vehicle-miles-traveled (VMTs) ranging from saved road maintenance costs to environmental benefits and reduced road fatalities.

Our initial study performed with the University of Southern Mississippi discovered that Amtrak's intercity train service between Albuquerque, NM and Dodge City, KS, was worth \$180 million annually to the economies of New Mexico, Colorado and Kansas, compared with roughly \$50 million spent annually to run the train from Illinois to California.³ Using the same economic model, *Rail Passengers* found that a second Amtrak train between Chicago and Minneapolis/ St. Paul could bring \$25 million annually for the state of Minnesota – an economic return of eight- to ten-times Minnesota's annual net spending to support the potential new service.⁴ Our organization found that the overall economic benefit for three states of Minnesota, Wisconsin and Illinois would be \$47 million annually—a return on investment of better than seven-to-one. And Amtrak's Empire Builder generates a \$327 million return to the 10 states served between Illinois and Washington, for an annual investment of roughly \$57 million.

Rail Passengers proposes that the *Economic and Station Development* metric would measure and report the annual total economic value produced in each served community, using the methodology that we have developed to account for factors such as labor, value-added benefits and increased tax revenues. A second metric would report this economic value as a ratio to the investment made by route.

Fully Capturing Economic Benefit - Normalized Route Performance

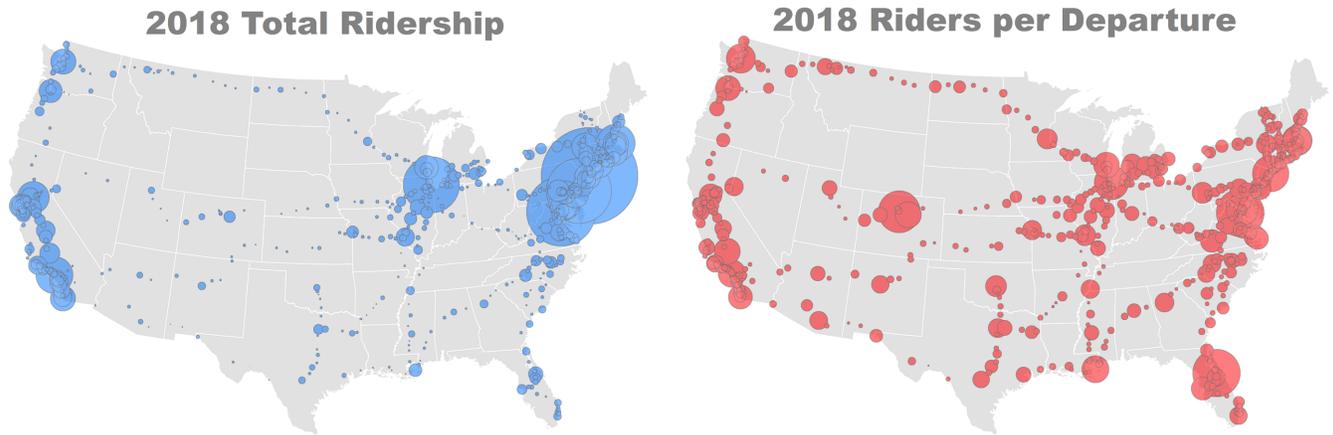
Rail Passengers believes a "per passenger mile" metric should be included in all route performance analyses, along with a "passengers per departure" metric, to help policy makers and the public ascertain the value of the public service being provided.

Amtrak most often uses only the "per passenger" metric, which fails to fully capture the public benefits provided by the route. It is important to look at "per passenger mile" cost as well because it illustrates the cost in relation to the length of trip. This helps control for the higher cost of providing transportation services to rural and western U.S. communities. Despite limited service, the 15 long-distance routes account for 42% of passenger miles carried by all of the nation's intercity passenger trains. Clearly, these routes perform a significant transportation function. As a single instance, by that measure the *Chief* performs well, falling in the top 50% of all of Amtrak's routes (23 out of 48).

³ Zhang, et al. University of Southern Mississippi/Rail Passengers Association. 'Bustituted: The Socioeconomic Impacts of Replacing Southwest Chief Service Over the Raton Pass' https://www.railpassengers.org/site/assets/files/5819/southwest_chief_economic_impact_study_final_bbb_1-11.pdf

⁴ Zumwalt. Rail Passengers Association. 'Research Note: Impacts From A Second Train To Minnesota' https://www.railpassengers.org/site/assets/files/5819/rpa_research_note-_new_train_to_mn.pdf

Likewise, examining each originating station's passengers on a "per departure" basis rather than solely through absolute boardings helps to account for the fact that some Amtrak routes only run three times per week or once per day, compared with multiple daily frequencies on the Northeast Corridor. The map included below (p. 9) illustrates the effect of normalizing route performance on a per-departure basis, portraying a Network that is well-used throughout the U.S. when the trains are actually available to ride.



Rail Passengers proposes that a *Normalized Route Structure* metric would report route performance for all routes on a per-passenger-mile basis, quarterly, and would include a measure of passengers-per-departure from each originating station, quarterly.

Fully Capturing Economic Benefits - Overlapping Corridors

Long distance routes, in effect, represent connected and overlapping corridors. The utility of individual routes grows exponentially when they become part of an integrated system that provides easy transfers to trains on other routes, feeder buses, local transit systems and airports. Such connectivity serves more people, generates greater revenue, drives economies of scale and improves public mobility.

To illustrate the concept, consider the 2,265-mile *Southwest Chief* corridor between Chicago and Los Angeles. Critics claim that air travel has made such routes obsolete; that it would be cheaper for government to buy each passenger an airline ticket than to run trains on this route.

If the *Chief* ran non-stop between these two cities, those critics would be 100-percent correct. Crucially, however, because the *Chief* makes 31 intermediate stops, it provides a mobility choice every single day of operation for the 25 million Americans who live within just 25 miles of a *Chief*-served station (31 million who live within 50 miles). These passengers can make short, medium and long-distance trips between any one of 528 different city pairs with each and every daily trip.

Amtrak ridership data demonstrate that trip lengths vary from very short (as few as 10 to 40 miles) to very long (more than 2,000 miles) and everything in between. Note that because many passengers connect to other trains at Chicago, Kansas City and Los Angeles, many trips are actually longer. Long-distance routes not only make transportation sense because they serve so many more markets every single trip than air ever could, they also make financial sense.

Rail Passengers proposes that an *Overlapping Corridors* metric would use the intermediate connections data gathered under Section 273.11(b) and our proposed Economic and Station Development benefits model to quantify the number and value of passenger trips dependent upon the intermediate connections on long-distance corridors, reported quarterly. The underlying community economic data used for the calculation should be updated annually.

Section 273.11 - Public Benefit, para (b)

"Paragraph (b) of this section proposes that the missed connections metric is the percent of passengers connecting to/from other Amtrak routes who missed connections due to a late arrival from another Amtrak train, reported by route and updated on an annual basis. A missed connection, particularly in a location with one daily train frequency, can result in a significant impact to the customer."

Rail Passengers Comment: *Rail Passengers* continues to support collecting and publishing data including the effect of degraded OTP on connections and the requirement for statistical reporting that details when late trains cause passengers to miss connections or when Amtrak is forced to delay departure of trains for connecting passengers. We believe, however, that the definition as proposed does not go far enough.

We believe the measurement standard in Section 273.11 (b) should be modified. The metric should include data to measure the financial effects of missed connections. We also believe that reporting this information on an annual basis is insufficient for passengers to make a judgment about whether they can rely on a particular connection to complete their journey. Collected and published data should also include OTP at key "chokepoints" where passenger trains are handed off from one host railroad to another.

Passengers who use more than one route to complete a trip represent a significant portion of Amtrak's business. In FY 2019, 2.15 million passengers generating nearly \$194 million in revenue made connections between trains, or between trains and Amtrak-connected motor coaches. When trains arrive at transfer stations many hours late it can lead to either of two unacceptable outcomes. The connecting train departs late because it waits for the connecting passengers, or the passengers miss the connection and, in cases where there is only one departure a day, arrive at their final destination as much as 24 hours after they had planned.

Many consequences grow from these scenarios. Hotel rooms are cancelled, and deposits forfeited, or extra expense is imposed on the traveler. Arrivals that had been scheduled for daylight hours can instead transform into dangerous night-time arrivals at thinly staffed or unstaffed stations; this can be especially troublesome for elderly or disabled travelers, posing a real safety risk which is magnified by these populations' outsize reliance on trains as their only practical means of long-distance travel.

Section 273.11 - Public Benefit, para (c)

"Paragraph (c) of this section proposes that the community access metric is the percent of Amtrak passenger-trips to and from not well-served communities, updated on an annual basis."

Rail Passengers Comment: Our Association strongly endorses this metric. We believe that monitoring and quantifying the degree to which Amtrak meets its mission as a taxpayer-supported enterprise to provide mobility throughout the U.S. is long overdue. We also believe that the definition for 'not well-served communities' is adequate for this purpose. We urge that this provision remain unaltered in the Final Rule.

SUMMARY

Modern passenger rail and fixed-guideway mass transit can carry large numbers of people longer and faster, more efficiently than ever before. Americans recognize this and increasingly are demanding more trains, better trains, faster trains and better rail infrastructure.

Rail Passengers believes that the proposed Rule defining Metrics and Minimum Standards for Intercity Passenger Rail Service ("the Rule") – held up by more than a decade of litigation and disagreement – at last provides a framework for substantive improvements in rail travel speeds, comfort and utility for Americans in small towns and big cities alike.

Rail Passengers believes this already excellent proposed Rule can be strengthened in the following ways:

1. Incorporate even more transparency on elements of passenger operations and performance;
2. Enhance customer surveys to recognize and include the disabled, the elderly, special-needs and rural passengers, and;
3. Include additional metrics to evaluate the customer experience without relying on a survey score, such as the number and rate of mishandled bags, customers not receiving booked service, consumer complaints, and metrics associated with those requiring ADA accommodations.
4. Broaden and strengthen the assessment of Public Benefits, to include the effects of economic contributions to served communities, network- and multiplier effects, the financial contributions of connections and the effect of degraded OTP on connections, and using per-passenger-mile and per-departure calculations in assessing the value and contributions of particular routes.

If you wish to follow up on *Rail Passengers'* comments or on any other policy matter, I and my team are at your disposal. Please contact Mr. Sean Jeans-Gail, VP of Policy, in our D.C. offices at (202) 408-8362 to arrange any briefings or meetings you might require. I would be happy to participate personally.

Respectfully submitted,



Jim Mathews
President & CEO
Rail Passengers Association
1200 G St. NW, Suite 240
Washington, DC 20005

1967



1990



2011



2017



RAILPASSENGERS
ASSOCIATION