
BEFORE THE
SURFACE TRANSPORTATION BOARD
DOCKET NO. NOR 42175

ENTERED
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May 7, 2024
Part of
Public Record

COMPLAINT AND PETITION OF THE NATIONAL RAILROAD PASSENGER CORP.
UNDER 49 U.S.C. § 29308(f)–FOR SUBSTANDARD PERFORMANCE OF
AMTRAK’S SUNSET LIMITED TRAINS 1 AND 2

**AMTRAK’S SUPPLEMENTAL RESPONSE TO THE BOARD’S INTERROGATORIES
AND DOCUMENT REQUIREMENTS; APPENDIX A – PART III**

The National Railroad Passenger Corp. (“Amtrak”) hereby supplements its September 25, 2023 response to Appendix A – Part III of the Surface Transportation Board’s July 11, 2023 Order. Along with the supplemental response, Amtrak is producing additional documents responsive to particular Investigative Questions. Amtrak respectfully directs the Board to the Table of Contents located at the end of this document, which identifies the documents Amtrak is producing in response to those Investigative Questions. Amtrak reserves the right to modify or supplement these responses if additional information becomes available.

Investigative Question No. 8 (Conductor Delay Reports). Produce conductor-entered delay reports, as well as any supplementary communications received, for all delays during the Relevant Period. The list should be in a machine-readable table.

Amtrak’s Response to Investigative Question No. 8: Amtrak uses the eDR system for conductors to document delays. Amtrak has prepared a machine-readable table listing delays that occurred during the Relevant Period, which is being produced as “Conductor Delay Reports Table.” (AMTRAK_STB_NATIVE_0003).

Pursuant to Appendix A, Part I, Instruction 6, Amtrak further responds that the name of the source database for the Conductor Delay Reports Table is the OTPMRS. Amtrak draws on that database to prepare a Categorized Delay Details report, which lists each delay entry and provides the following information about each of those delays:

- Origin Date;
- Host Railroad;
- From;
- To;
- Service(s);
- Train(s);
- Delay type(s);
- Note;
- Division;
- Minutes; and
- Delay Reason.

Amtrak did not rely on any intermediate files and computer programs to prepare the Conductor Delay Reports Table. The records relied upon to create the produced machine-readable file were selected by querying the pertinent database for records associated with *Sunset Limited* Trains that

either originated or terminated within the Relevant Period. Further to Appendix A, Part I, Instruction 6, Amtrak responds that a data dictionary detailing the information set out in Instruction 6(b)(i)-(vii) is being produced as AMTRAK_STB_NATIVE_0004. Finally, Amtrak is conducting a reasonable and diligent search for any supplemental communications from *Sunset Limited* conductors and concerning the delay reports entered through eDR during the Relevant Period.

Amtrak's Supplemental Response to Investigative Question No. 8: Based on its reasonable and diligent search, Amtrak is producing communications from *Sunset Limited* conductors and concerning the delay reports entered through eDR during the Relevant Period, which are Bates Stamped AMTRAK_STB_0010090 and AMTRAK_STB_0010108— AMTRAK_STB_0010115.

Investigative Question No. 18 (Revised run time metric submissions). Since FRA commenced publication of the PRIIA § 207 data under 49 C.F.R. Part 273, the Run Time Metric workbooks have been revised and replaced for FY 22 Q1, FY 22 Q2, and FY 22 Q3.¹ The revised workbooks include at least two changes. First, as originally published, the FY 22 Q3 run time summary data for Train 1 showed scheduled run time of 4,005 minutes, versus 2,795 in the Schedule Skeleton provided in Appendix A of Amtrak’s Complaint. Second, in the same FY 22 Q3 Run Time Metric workbook, the scheduled time for Amtrak’s short segment of *Sunset Limited* Train No. 1 was shown as 195 minutes, versus 15 minutes in the Schedule Skeleton in Appendix A of Amtrak’s Complaint. Explain if the need for changes resulted from errors on Amtrak’s part, and if so, explain the steps subsequently taken to prevent their recurrence. In addition, review your Run Time data for the Relevant Period (all worksheets and parameters) and identify any remaining needed changes, in Amtrak’s view. Produce revised data workbooks with changed run times.

Amtrak’s Response to Investigative Question No. 18: Amtrak appreciates the opportunity to explain this issue. The first change to the Run Time Metric workbook was driven by legacy operations. Beginning in 1993, the *Sunset Limited* operated between various points in Florida and Los Angeles, California. As the Board is aware, the portion of that service running from Orlando, Florida to New Orleans, Louisiana was suspended in 2005, following damage caused by Hurricane Katrina. After that occurred, Amtrak’s reporting of run time data failed to remove the run time associated with the Orlando-to-New Orleans portion of the service from the total run time for Train 1,² resulting in calculations that showed inflated run time for Train 1. Amtrak has corrected that error.

With regard to the second issue the Board identified, Amtrak found a mapping location issue that resulted in the report showing Amtrak having 195 minutes of scheduled run time instead of 15 minutes. Amtrak is evaluating process improvements to prevent the occurrence of similar issues, and emphasizes that neither issue affected the host run time calculations contained within its Complaint and Petition for this proceeding about the *Sunset Limited*, which stated the correct

¹ Intercity Passenger Rail Service Quality and Performance Reports, railroads.dot.gov/rail-network-development/passenger-rail/amtrak/intercity-passenger-rail-service-quality-and (select “Archived Reports”) (last visited July 11, 2023).

² This issue is idiosyncratic, in that none of Amtrak’s other long-distance routes are subject to any service suspensions.

run time for Train 1 (2,795 minutes) and the current run time for the Amtrak segment of that Train (15 minutes).

Amtrak has also undertaken a thorough review of its run time data for the Relevant Period to identify any additional issues. During that review, Amtrak discovered an anomaly in the logic used to report long-distance routes, which occurred when the same host railroad was responsible for two discontinuous track segments along the route. This discrepancy affects a small number of long-distance routes and Amtrak is in the process of implementing a technical fix so that it can restate its reporting for the FRA. Importantly, this issue with the run time logic does not affect the computations stated in Amtrak's Complaint and Petition in this proceeding about the *Sunset Limited* because Amtrak relied on a custom run time script in preparing the Complaint and Petition.³ Amtrak anticipates completing the restatement of its reporting for the FRA in the fall and will provide the Board with any revised data workbooks Amtrak provides to the FRA.

Amtrak's Supplemental Response to Investigative Question No. 18: Amtrak is producing the restated Host Running Time reports provided to the FRA, which are Bates Stamped AMTRAK_STB_0048173—AMTRAK_STB_0048177. Amtrak reiterates that issues with the run time logic did not affect the Host Running Time computations stated in Amtrak's Complaint and Petition in this proceeding because Amtrak relied on a custom run time script in preparing the Complaint and Petition.

³ Amtrak prepared the custom script so that it could break out initial terminal delay for the Board.

Respectfully submitted,

Dated: May 7, 2023

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CERTIFICATE OF SERVICE

I, Jessica Ring Amunson, certify that copies of this document are simultaneously being provided by email to all parties identified on the service list for this proceeding, Docket Number NOR 42175.

May 7, 2023

/s/ Jessica Ring Amunson
Jessica Ring Amunson

TABLE OF CONTENTS

Request Responsive To	Document	Bates	Confidentiality Designation
8	Conductor Communication re Delay Reporting	AMTRAK_STB_0010090	Confidential
8	Conductor Communication re Delay Reporting	AMTRAK_STB_0010108	Confidential
8	Conductor Communication re Delay Reporting	AMTRAK_STB_0010109	Confidential
8	Conductor Communication re Delay Reporting	AMTRAK_STB_0010110	Confidential
8	Conductor Communication re Delay Reporting	AMTRAK_STB_0010111	Confidential
8	Conductor Communication re Delay Reporting	AMTRAK_STB_0010113	Confidential
8	Conductor Communication re Delay Reporting	AMTRAK_STB_0010114	Confidential
8	Conductor Communication re Delay Reporting	AMTRAK_STB_0010115	Confidential
18	Host Run Time Report_Sunset Ltd_01Oct2022 to 08Dec2022	AMTRAK_STB_0048173	Public
18	Host Run Time Report_Sunset Ltd_FY22 Q1	AMTRAK_STB_0048174	Public
18	Host Run Time Report_Sunset Ltd_FY22 Q2	AMTRAK_STB_0048175	Public
18	Host Run Time Report_Sunset Ltd_FY22 Q3	AMTRAK_STB_0048176	Public
18	Host Run Time Report_Sunset Ltd_FY22 Q4	AMTRAK_STB_0048177	Public