

SERVICE DATE – APRIL 17, 2025

SURFACE TRANSPORTATION BOARD

DECISION

Docket No. NOR 42175

COMPLAINT AND PETITION OF THE NATIONAL RAILROAD PASSENGER CORP.
UNDER 49 U.S.C. § 24308(f)—FOR SUBSTANDARD PERFORMANCE OF AMTRAK’S
SUNSET LIMITED TRAINS 1 AND 2

Decided: April 16, 2025

The National Passenger Rail Corp. (Amtrak) submitted passenger counts for the *Sunset Limited* route as part of its September 23, 2023 workpapers. The Board has identified potential errors and inconsistencies in these counts. The “Illustrative Passenger Count Data” tables below show passenger counts derived from three sources: (a) Amtrak’s station pair data submitted in this docket; (b) Amtrak’s customer on-time performance (COTP) by run data and COTP by location data also submitted in this docket; and (c) the station performance metric as reported by the Federal Railroad Administration (FRA). For each of the two trains, the total passenger numbers show discrepancies among sources in all four quarters shown.¹

As part of an investigation under 49 U.S.C. § 24308(f), “the Board has authority to review the accuracy of train performance data.” It is important to ensure that the number of passengers exiting an Amtrak train at each station is correct, as those figures are used to calculate COTP,² i.e., the key passenger train performance metric for Board purposes here. Accordingly, Amtrak will be directed to submit the following by May 1, 2025:

- (1) an explanation of why Amtrak’s separate passenger counts for the *Sunset Limited* appear to be inconsistent;

¹ The tables below contain data from only the four full quarters of the Relevant Period, as the fifth quarter of the Relevant Period is not a full quarter and FRA’s COTP data is only reported in full quarters. However, Amtrak should address the passenger counts for the fifth quarter as well.

² See Metrics and Minimum Standards for Intercity Passenger Rail Service, 85 Fed. Reg. 72,971 (Nov. 16, 2020) (codified at 49 C.F.R. part 273).

(2) as appropriate, corrected passenger counts and related data for the Relevant Period,³ including resubmissions of any spreadsheets or files that are impacted by a reassessment of Amtrak's passenger counts, and

(3) an explanation of whether, and generally to what extent, any inconsistencies or corrections would impact FRA's on-time performance data in its quarterly Intercity Passenger Rail Service Quality and Performance Reports.⁴

ILLUSTRATIVE PASSENGER COUNT DATA

2022 Q1, 10-1-2021 – 12-31-2021:

File Source	Total Passengers	Late Passengers	Train 1 Total Passengers	Train 1 Late Passengers	Train 2 Total Passengers	Train 2 Late Passengers
Station Pair ⁵	18341	N/A	9005	N/A	9336	N/A
Lateness-COTP by Location, COTP by Run ⁶	20385	12279	10369	6247	10016	6032
FRA Intercity Passenger Rail Service Quality and Performance Reports, FY22 Q2 Station Performance Metric.xlsx, Station Performance ⁷	20363	12210	10504	6313	9859	5897

³ The Board has specified that the Relevant Period in this docket is October 1, 2021, through December 8, 2022. Compl. & Pet. of the Nat'l R.R. Passenger Corp. Under 49 U.S.C. § 24308(f)—For Substandard Performance of Amtrak's Sunset Ltd. Trains 1 & 2, slip op. at 20 NOR 42175 (STB served July 11, 2023).

⁴ See Intercity Passenger Rail Service Quality and Performance Reports, <https://railroads.dot.gov/rail-network-development/passenger-rail/amtrak/intercity-passenger-rail-service-quality-and> (last visited Apr. 16, 2025).

⁵ Amtrak's Reply, Sept. 25, 2023 ("Public Workpapers," (file name "AMTRAK_STB_NATIVE_0025.xlsx)). Data filtered for the period using 'Month Year Day' values; 'Total Passengers' data from 'Ridership.'

⁶ Amtrak's Reply, Sept. 25, 2023 ("Public Workpapers," (file name "AMTRAK_STB_NATIVE_0022.xlsx")). Lateness-COTP by Location, data filtered for the period using 'Train Index Date' values; 'Total Passengers' data from 'Total Rider Quantity'; 'Late Passengers' data from 'Late Rider Quantity.' COTP by Run data filtered for the period using 'Origin Date' values; 'Total Passengers' data from 'All Pax'; 'Late Passengers' data from 'Late Pax.'

⁷ Intercity Passenger Rail Service Quality and Performance Reports, <https://railroads.dot.gov/rail-network-development/passenger-rail/amtrak/intercity-passenger-rail-service-quality-and> (last visited Apr. 16, 2025). 'Total Passengers' data from 'Total Detraining Customers'; 'Late Passengers' data from 'Late Detraining Customers.'

2022 Q2, 1-1-2022 – 3-31-2022:

File Source	Total Passengers	Late Passengers	Train 1 Total Passengers	Train 1 Late Passengers	Train 2 Total Passengers	Train 2 Late Passengers
Station Pair	14831	N/A	7209	N/A	7622	N/A
Lateness-COTP by Location, COTP by Run	16291	11560	8264	6310	8027	5250
FRA Intercity Passenger Rail Service Quality and Performance Reports, FY22 Q2 Station Performance Metric.xlsx, Station Performance	16370	11573	8343	6323	8027	5250

2022 Q3, 4-1-2022 – 6-30-2022:

File Source	Total Passengers	Late Passengers	Train 1 Total Passengers	Train 1 Late Passengers	Train 2 Total Passengers	Train 2 Late Passengers
Station Pair	21144	N/A	10700	N/A	10444	N/A
Lateness-COTP by Location, COTP by Run	22862	20528	11807	10699	11055	9829
FRA Intercity Passenger Rail Service Quality and Performance Reports, FY22 Q3 Station Performance Metric.xlsx, Station Performance	22915	20538	11860	10709	11055	9829

2022 Q4, 7-1-2022 – 9-30-2022:

File Source	Total Passengers	Late Passengers	Train 1 Total Passengers	Train 1 Late Passengers	Train 2 Total Passengers	Train 2 Late Passengers
Station Pair	19956	N/A	10020	N/A	9936	N/A
Lateness-COTP by Location, COTP by Run	21729	19814	11197	9981	10532	9833
FRA Intercity Passenger Rail Service Quality and Performance Reports, FY22 Q4 Station Performance Metric.xlsx, Station Performance	21792	19866	11260	10042	10532	9824

Additionally, in Amtrak's station pair data file for the Relevant Period, certain columns contain negative values for ridership, revenue, and passenger-miles. (Amtrak's Reply, Sept. 25, 2023 ("Public Workpapers," (file name "AMTRAK_STB_NATIVE_0025.xlsx)).) Accordingly, Amtrak's submission should also address why the station pair data file contains negative values.

Lastly, Amtrak should explain why some of the values in the station pair data's "Month Year" column do not correlate with the month and year presented in the "Month Year Day" column. (See id.)

It is ordered:

1. Amtrak is directed to submit the information and explanations specified in this decision by May 1, 2025.
2. This decision is effective on its service date.

By the Board, Neil E. Moyer, Director, Office of Passenger Rail.