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BEFORE THE
SURFACE TRANSPORTATION BOARD
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

AMTRAK’S RESPONSE TO THE BOARD’S APRIL 17, 2025 ORDER

Pursuant to the Surface Transportation Board’s (“Board”) April 17, 2025 Order (“Order”), the National Railroad Passenger Corp. (“Amtrak”) hereby responds to the additional questions directed to Amtrak by the Board. Amtrak’s response is based on a reasonable and diligent investigation of its records and the information reasonably available to Amtrak at this time. Amtrak reserves the right to modify or supplement its responses if additional information becomes available.

I. PASSENGER COUNT DATA

Investigative Question. Amtrak is directed to provide an explanation of why Amtrak’s separate passenger counts for the *Sunset Limited* in (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) appear to be inconsistent.

Amtrak’s Response: After a diligent investigation, Amtrak respectfully responds that the passenger information contained in the “Lateness-COTP by Location, COTP by Run” data submitted to the Board (AMTRAK_STB_NATIVE_022) is correct. In its April 17, 2025 Order, the Board included a run from Train 2 on September 29, 2021 in its calculations, which inflated the values reported by the Board for the 2022 Q1 Lateness-COTP by Location, COTP by Run passenger data. The data Amtrak submitted to the Board in AMTRAK_STB_NATIVE_022 remains consistent.

The Station Performance Metric reported to the FRA had a discrepancy related to Train 1 ridership at San Antonio due to Train 421 (the *Texas Eagle*) joining with a Train 1 that originates one day later. Some customers were inadvertently being counted twice – both for Train 21’s COTP for arrival stations between Chicago and San Antonio and for Train 1’s COTP for arrival stations between Del Rio, Texas and Los Angeles. Using the correct count of passengers for this section, the passenger data submitted to the FRA is consistent with that found in the Lateness-COTP by Location, COTP by Run data submitted to the Board (AMTRAK_STB_NATIVE_022). This error in the FRA Station Performance Metric did not affect any of the data submitted with the Complaint in this matter.

Similarly, the Station Pair report (AMTRAK_STB_NATIVE_0025) inadvertently did not include ridership from Trains 421 and 422 where the *Texas Eagle* joins with the *Sunset Limited*. Once those passengers from the *Texas Eagle* are correctly attributed to the *Sunset Limited* ridership, the variance between the Station Pair report and the other two reports is one percent or less per fiscal quarter. These minor variances are likely attributable to discrepancies between the ticket lift date versus the train index date for passengers on a long-term route and the attribution of partial or full ridership to the *Texas Eagle* or the *Sunset Limited* for accounting purposes.

Investigative Question. Amtrak is directed to provide, as appropriate, corrected passenger counts and related data for the Relevant Period, including resubmissions of any spreadsheets or files that are impacted by a reassessment of Amtrak’s passenger counts.

Amtrak’s Response: Amtrak is submitting a Station Performance Metric report (AMTRAK_STB_48173), which contains the corrected data for FRA reporting purposes and a revised Station Pair report (AMTRAK_STB_NATIVE_0025.2), which contains the corrected passenger attributions for the *Sunset Limited*. Amtrak has also summarized the passenger count information for the 2022 fiscal year categorized by quarter and report type in Tables 1-4.

Table 1
ILLUSTRATIVE PASSENGER COUNT DATA 2022 Q1, 10-1-2021 – 12-31-2021

File Source	Total Passengers	Train 1 Passengers	Total	Train 2 Total Passengers
Station Pair	20323	10398		9925
Lateness- COTP by Location, COTP by Run	20228	10369		9859
FRA Intercity Passenger Rail Service Quality and Performance Reports, FY22 Q2 Station Performance Metric.xlsx, Station Performance	20228	10369		9859

Table 2
ILLUSTRATIVE PASSENGER COUNT DATA 2022 Q2, 1-1-2022 – 3-31-2022

File Source	Total Passengers	Train 1 Total Passengers	Train 2 Total Passengers
Station Pair	16425	8322	8103
Lateness- COTP by Location, COTP by Run	16291	8264	8027
FRA Intercity Passenger Rail Service Quality and Performance Reports, FY22 Q2 Station Performance Metric.xlsx, Station Performance	16291	8264	8027

Table 3
ILLUSTRATIVE PASSENGER COUNT DATA 2022 Q3, 4-1-2022 – 6-30-2022

File Source	Total Passengers	Train 1 Total Passengers	Train 2 Total Passengers
Station Pair	23123	11985	11138
Lateness- COTP by Location, COTP by Run	22862	11807	11055
FRA Intercity Passenger Rail Service Quality and Performance Reports, FY22 Q2 Station Performance Metric.xlsx, Station Performance	22862	11807	11055

Table 4
ILLUSTRATIVE PASSENGER COUNT DATA 2022 Q4, 7-1-2022 – 9-30-2022

File Source	Total Passengers	Train 1 Total Passengers	Train 2 Total Passengers
Station Pair	21812	11235	10577
Lateness- COTP by Location, COTP by Run	21729	11197	10532
FRA Intercity Passenger Rail Service Quality and Performance Reports, FY22 Q2 Station Performance Metric.xlsx, Station Performance	21729	11197	10532

Investigative Question. Amtrak is directed to provide 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.

Amtrak's Response: As Amtrak discussed in its above response, the inconsistencies in the 2022 report submitted to the FRA concerned an aberration in reporting related to Train 1 ridership at San Antonio, affecting the data for only Trains 1 and 21. That issue was corrected in 2023 and there is no ongoing impact to the FRA's on-time performance data in its quarterly Intercity Passenger Rail Service Quality and Performance Reports. Moreover, the issue does not have any impact on whether the *Sunset Limited* meets the statutory criteria of averaging less than eighty percent on-time performance for any two consecutive calendar quarters for the quarters at issue in this proceeding. *See* 49 U.S.C. § 24308(f)(1).

II. OTHER STATION PAIR REPORT DATA

Investigative Question. 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.

Amtrak's Response: The Board previously requested this same information from Amtrak in its November 20, 2023 Order. Amtrak respectfully refers the Board to Amtrak's December 5, 2023 response to the Board in its Follow-Up on Investigative Question No. 37. As Amtrak previously stated: To report total passenger trips, passenger miles, and ticket revenue at the origin - destination level, Amtrak queried pro forma records, which show negative values for ridership, revenue, and miles because of necessary accounting adjustments that address matters such as refunds, cancellations, and the reconciliation of ticket lifts.

Investigative Question. 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.)

Amtrak's Response: Amtrak respectfully responds that differences between the values in the Station Pair report's "Month Year" and "Month Year Day" columns generally are due to discrepancies in the ticket lift date and the train index date. Discrepancies may occur at the very beginning or very end of a given month as passengers can board a long-term route like the *Sunset Limited* on a different day than the date they exit the train, leading to differences between the ticket lift and index date. In addition, the accounting reporting for the *Sunset Limited* is aggregated on an annual basis, rather than a monthly basis. On occasion, it is necessary to make accounting adjustments retroactively for matters such as missed tickets. This can affect the date values of certain entries at the month level.

Respectfully submitted,

Dated: May 1, 2025

/s/ Jessica Ring Amunson

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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 1, 2025

/s/ Jessica Ring Amunson
Jessica Ring Amunson

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Document	Bates	Confidentiality Designation
Sunset Station Pair Data	AMTRAK_STB_NATIVE_0025.2	Public
Station Performance Metric FY2022	AMTRAK_STB_48173	Public