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Surface Transportation Board
Docket No. EP 726

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Comments on:

Notice of Proposed Rulemaking: On-Time Performance Under Section 213 of the Passenger Rail Investment and Improvement Act of 2008

Submitted by:

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As a member of the travelling public who uses Amtrak on a regular basis for long-distance travel, I submit the following comments on the Notice of Proposed Rulemaking regarding on-time performance of Amtrak trains.

The proposed rule unnecessarily over-complicates the issue of "Definition of 'On Time'".

The original effort by the ICC to define "On Time" relative to the distance travelled by any given train was flawed and showed a lack of understanding about how passenger trains operate on freight railroads.

The matter can easily be simplified and addressed by applying the "500 to No Limit" distance operated maximum allowance to all trains. That is, "On Time" should be defined as an arrival 30 minutes or before the scheduled arrival time at a train's final terminus. A train should be deemed "late" if it arrives 31 minutes or more at its final destination, without regard to distance travelled.

Application of a single definition for all trains will simplify almost every aspect of the proposed rule. The Appendix to Docket No. EP 726 thus would read in part:

1040.2 Definition of "On Time"

A train is "on time" if it arrives at its final terminus no later than 30 minutes after its scheduled arrival time.