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June 24, 2014

Commissioner James Madaffer
California Transportation Commission
550 Front Street Suite 3101
San Diego, CA 92101

Subject: Preliminary Review of Pacific Surfliner On-Time Performance

Dear Mr. Madaffer,

I write to provide North County Transit District's (NCTD) initial review of reports that attribute to the primary cause of train delays to commuter trains in San Diego County. It is clear that there is some confusion about the reporting provided by LOSSAN as it relates to the root cause of delays that are being experienced on the railroad.

The February 2014 LOSSAN report states, *"Train delays on the Pacific Surfliner in February 2014 can mostly be attributed to train interference with commuter trains in San Diego County. Train interference is defined as all delays related to other train movements in the area. This category includes delays due to switching to alternate tracks or routes to operate around other trains."*

I have spoken with Amtrak officials and have reviewed Amtrak's Monthly Performance Reports that are publicly available online. Within the monthly reports, Amtrak provides reports as required by PRIA Section 207 which captures the total host responsible delays along with the largest two delay categories. The delay categories for host railroad responsible delays include:

- Freight Train Interference (FTI) – Delays for freight trains
- Passenger Train Interference (PTI) – Delays for meeting or following all other passenger trains
- Commuter Train Interference (CTI) – Delays for meeting or following commuter trains
- Slow Order Delays (DSR) – Temporary slow orders, except heat or cold orders
- Signal Delays (DCS) – Signal failure or all other signal delays, wayside defect-detector false alarms, defective road crossing protection, efficiency tests, drawbridge stuck open
- Routing (RTE) – Routing-dispatching delays including diversions, late track bulletins, etc.
- Maintenance-of-Way (DMW) – Maintenance-of-Way delays including holds for track repairs of MW foreman to clear
- Detour (DTR) – Delays from detours

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There is insufficient detail in the LOSSAN reports related to the root cause for delay and it is my understanding that LOSSAN recognizes that as well and is taking steps to standardize reporting to capture root cause. The February 2014 report by LOSSAN unintentionally leaves the impression that the delays were due to COASTER trains. Per my discussions with Amtrak, the delay category of Commuter Train Interference includes delays that are attributable to both Metrolink and COASTER within San Diego County. Further, the delay category also captures the cascading impact of delay that may have occurred north of San Diego County.

Accordingly, it is clear that the LOSSAN report needs to consider the root cause of delays that are occurring north of San Diego County as well as within San Diego County to provide policymakers a better understanding of the cause of delay. Specifically, the report needs to allocate delay to either Metrolink or COASTER when using the Commuter Train Interference delay category. Also, Amtrak's February 2014 monthly report attributes the primary cause of delay on the Pacific Surfliner to freight hosted track related to slow orders and signal delays. Finally, I have contacted Amtrak to discuss if there were significant issues of delay within San Diego County that were due to NCTD operations or dispatch; Amtrak stated that they were not aware of any issues.

NCTD staff will collaboratively engage with LOSSAN, Metrolink, and Amtrak to ensure that the reports provide operators and policymakers with information that supports addressing the root cause of delay. We will provide you with periodic updates to keep you informed of our progress.

Please advise if there are any additional questions or clarifications. You may reach me at (760)967-2867 or mtucker@nctd.org.

Sincerely,



Matthew O. Tucker
Executive Director

CC: Gary Gallegos, SANDAG, Executive Director
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