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Thomas F. Prendergast
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Metropolitan Transportation Authority

State of New York

October 9, 2013

Ms. Carmen Maldonado
Audit Director
The Office of the State Comptroller
Division of State Government Accountability
123 William Street – 21st Floor
New York, NY 10038

Re: Final Report #2013-F-9 (Follow-Up to Selected Aspects of Railcar Fleet Maintenance)

Dear Ms. Maldonado:

This is in reply to your letter requesting a response to the above-referenced report.

I have attached for your information the comments of Carmen Bianco, President, NYC Transit, which address this report.

Sincerely,

A handwritten signature in black ink, appearing to read "T. F. Prendergast", with a long horizontal line extending to the right.

Thomas F. Prendergast
Chairman and Chief Executive Officer

Attachment

The agencies of the MTA

MTA New York City Transit
MTA Long Island Rail Road


MTA Metro-North Railroad
MTA Bridges and Tunnels

MTA Capital Construction
MTA Bus Company

Memorandum



New York City Transit

Date October 7, 2013
To Thomas F. Prendergast, Chairman and Chief Executive Officer, MTA
From Carmen Bianco, President, NYCT 
Re NYS Comptroller's Final Report – (2013-F-9) "Selected Aspects of Rail Car Fleet Maintenance"

New York City Transit management has reviewed the August 13, 2013 follow-up Final Report (2013-F-9) on "Selected Aspects of Rail Car Fleet Maintenance" and offers the following comments in regard to the recommendations.

Recommendation #1:

Increase the timeliness of input of mileage data in RSMIS. (Partially Implemented.)

NYCT Response: As indicated by the auditors, this is being implemented through a new initiative, I-TRAC (Integrated Train Register Activity Console), which will provide real-time information to RSMIS on rail car mileage to facilitate the scheduling of inspections. Although a previous target date for implementation was given for 2012, NYCT priorities for TIS resources required redeployment of the personnel assigned to the I-TRAC Subdivision B rollout in order to program the Staten Island I-TRAC deliverable. I-TRAC project management for Subdivision B rollout was then assumed by the Department of Subways (DOS) with assistance from TIS. TIS expects to have the interface program unit tested by the end of 2013, followed by validation of the data and a user acceptance protocol. Once it passes the user acceptance test and is signed off by the user (DOS), the interface program will be implemented in production, addressing the audit finding. Concurrently, a fully automated A Division feed into I-TRAC will be implemented. Acceptance testing and software revision will continue through 2014, with full utility for RSMIS expected by the fourth quarter of 2014.

Recommendation #2:

Monitor when inspections are occurring and the reasons they are not performed in a timely manner to ensure that, at a minimum, they meet the established goal of 80 percent. (Partially Implemented.)

NYCT Response: Daily inspections are routinely monitored to ensure that all required inspections are completed. Additionally, we will roll out the manual recordkeeping that Coney Island performs in regard to inspection variances to the remainder of the maintenance shops until such time as the I-TRAC is fully implemented. Since the timeliness of mileage data is essential to scheduling inspections, we will be in a position to provide a more meaningful variance explanation when I-TRAC mileage data is available by the fourth quarter of 2014.

Recommendation #3:

Re-assess the 80 percent goal for timeliness of inspections to determine whether a higher goal would be appropriate. (Not Implemented.)

NYCT Response: We agree with the intent of the recommendation. However, similar to our position on Recommendation #2 above, we will be better able to re-assess the current goal when I-TRAC is operational. While we are currently managing inspections so that 85% are within the time and mileage windows, we feel it is necessary to have the new I-TRAC mileage recording system fully operational before committing to a higher number. Allowing for a reasonable start-up period, we will re-assess the goal by the first quarter of 2015.

Recommendation #4:

Make sure that the Timeliness of Inspection Report is distributed to Transit's senior management. (Implemented.)

NYCT Response: We have no further comment on this recommendation.

Recommendation #5:

Monitor all Railway cars to ensure that inspections are performed timely and are documented properly. (Implemented.)

NYCT Response: We have no further comment on this recommendation.

Recommendation #6:

Determine the possible savings from extending the inspection interval for the newest classes of cars. (Implemented.)

NYCT Response: We have no further comment on this recommendation.

Recommendation #7:

Evaluate extending Railway's car inspection interval to 66 days (plus or minus 5 days). (Implemented.)

NYCT Response: We have no further comment on this recommendation.

Thomas F. Prendergast
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Recommendation #8:

Determine why the scheduled SMS procedures were not performed as required and implement procedures to correct the problem(s). (Partially Implemented.)

NYCT Response: We agree with the intent of the recommendation and believe it has been fully implemented. In the original review, the auditors questioned why certain SMS work was not reported as completed. It was explained that certain SMS procedures were not required on certain cars because the components in question did not exist on those cars, owing to variations in car configuration. The Scheduled Maintenance System templates used to record completed work did not reflect these configuration differences. We changed them and explained that only the forms for car classes enrolled in SMS in a given year would be used, and that it would, therefore, take several years for every car class template to be used because of the SMS production schedule. Notwithstanding this schedule, we believe that we are fully compliant with the recommendation, being able to document both legitimate production shortfalls, as well as any work not required due to car configurations.

Recommendation #9:

Department of Subways management should require Railway to operate under Transit's Rail Fleet Management Plan for maintaining railcars in accordance with standards and procedures established for Transit's fleet, and require Railway to report performance results regularly to senior management. (Not implemented.)

NYCT Response: We agree with the recommendation and believe it has been fully implemented. As we have indicated to the auditors that Staten Island Railway does operate under the Transit's fleet plan. All maintenance work performed on its fleet of 63 R-44 type rail cars is consistent with New York City Transit's Car Equipment R-44 Work Manual, including the Scheduled Maintenance System (SMS) Component Overhaul Plan developed by the Division of Car Equipment and Staten Island Railway. Finally, Staten Island Railway reports on its fleet inspections monthly to senior management.

We appreciate the opportunity to review and comment on the report. If you require any further information, please do not hesitate to contact me.