

2 Broadway
New York, NY 10004
212 878-7000 Tel

Thomas F. Prendergast
Chairman and Chief Executive Officer



Metropolitan Transportation Authority

State of New York

November 11, 2015

Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Honorable Thomas P. DiNapoli ✓
Office of the State Comptroller
633 Third Avenue, 31st Floor
New York, NY 10017

RE: Response to Report #2014-S-56 – Train On-Time Performance

Gentlemen:

On August 12, 2015, the Office of the State Comptroller issued the above referenced audit report. As required by Section 170 of the Executive Law, I am providing you with the attached response which addresses the recommendations contained in the report.

A copy of the final audit report is attached for your convenience.

Sincerely,

Thomas F. Prendergast
Chairman and Chief Executive Officer

RECEIVED
EXECUTIVE CORRESPONDENCE

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OFFICE OF THE STATE COMPTROLLER
THOMAS P. DINAPOLI
COMPTROLLER

Attachment

c: Donna M. Evans, MTA Chief of Staff

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 November 2, 2015

To Thomas F. Prendergast, Chairman and Chief Executive Officer, MTA

From James Ferrara, Interim President, NYC Transit

A handwritten signature in black ink, appearing to read "James Ferrara", written over the "From" line.

Re Train On-Time Performance (#2014-S-56)

The following is NYC Transit's 90-day update regarding the above referenced audit report issued by the State Comptroller's Office.

The stated purpose of the report was "to determine whether the Metropolitan Transportation Authority's New York City Transit trains run on time, and whether actions are taken to address recurring problems that reduce On-Time Performance."

As noted in the initial response to the report, New York City Transit On-Time Performance goals – as well as performance against those goals – is a matter of public record. We set aggressive targets for ourselves annually and report on our performance against those targets every month. We explain variances – both positive and negative – and discuss corrective actions that have been taken or that will be taken in the future. We have also reinforced that the best way to measure customer experience with respect to service reliability is to measure the time a customer has to wait for a train at his/her station not when that train arrives at the end of the line.

We continue to disagree with the audit's assertion that New York City Transit lacks (1) formal processes to explain the underlying causes of delay and (2) formal corrective action plans and programs to address the causes of delays and improve On-Time Performance. As we have stated, while On-Time Performance is an important management measure for Subways, our primary service delivery focus is on evenness of service, not on schedule adherence at the arriving terminal location. This is our focus because, generally speaking, our customers—relatively few of whom travel all the way to a terminal station—are more significantly affected by the time they wait for a train at a station along the route rather than the difference between the actual and scheduled arrival time at terminal stations. For example, a train that arrives seven minutes late at its terminal is considered late and this is reflected in On-Time Performance statistics. However, that same train may have been consistently three minutes behind the preceding train, providing evenly spaced and frequent service to customers along the route. The degree to which the intervals between trains conform to our scheduled intervals between trains is captured in our Wait Assessment indicator. For this reason, Wait Assessment, not On-Time Performance, is our primary customer service indicator.

Key Recommendations

Comptroller Recommendation 1: Identify the underlying causes of recurring train delays and develop corrective action plans to proactively address those causes. Such plans should address the effectiveness of workgroup efforts, identify responsible parties, and require written feedback and measurable solutions.

Comptroller Recommendation 2: Require monthly feedback from Subways managers on the action taken to address recurring categories of train delays.

We continue to strongly disagree with the assertions that New York City Transit failed to identify the underlying causes of delays and that we did not have a plan in place to improve On-Time Performance.

Since 2009, Operations Planning has been reviewing train performance, particularly running times, and revising timetables based on data analysis. During the period reviewed by the auditors (March 2013-March 2014), for example, Operations Planning was actively reviewing 2/3/4/5 subway line running times for implementation of revised timetables based on actual running times. These timetable revisions were phased in from April through July 2014. Additional timetable revisions on other lines based on more recent data have continued since the revisions to the 2/3/4/5 subway lines. In addition, Subways regularly reviews On-Time Performance in performance reviews at senior management and operating manager levels. It is a key internal service management tool.

New York City Transit's service performance workgroups and committees continue to meet regularly to review the effectiveness of their programs, and they generally require updates from managers on the progress of initiatives for which they are responsible. We are well aware that an essential element of improving performance is not only identifying the cause of a delay but also identifying the party responsible for correcting the delay in both short- and long-term. Delay management remains a consistent focus of New York City Transit management. Service performance improvements are addressed through weekly and bi-weekly service performance meetings, Department of Subways and Operations Planning joint task forces and numerous initiatives to implement delay management strategies in the field as well as the Rail Control Center.

New York City Transit's action plans and initiatives are in direct response to changes in operating conditions. Delays caused by crowding and ridership are addressed by several initiatives to reduce dwell times such as additional platform controllers, step aside boxes, and revising door announcements to speed door closing. Other initiatives include monitoring platform crowding conditions via cameras, staging personnel to respond to real-time conditions, improving communications during service disruptions, and formalizing a partnership with NYPD to assist with platform metering during incidents.

Delays caused by planned and unplanned work on the right of way are addressed by several initiatives to prevent incidents, respond to incidents more quickly, and improve

coordination of planned work. To prevent incidents, New York City Transit is targeting highest incident locations by enhancing inspections, increasing ultrasonic testing, and aggressively installing Continuous Welded Rail. To respond more quickly to incidents, we are strategically deploying mobile teams comprised of Signals, Track and Third Rail personnel, adding signal maintenance staff coverage on the Lexington Corridor, and adding other multi-discipline response personnel.

These efforts are being carefully monitored and rolled out in a phased approach after their effectiveness has been determined and modified for the unique operating characteristics of the other lines.

The above are some specific examples of efforts underway, and numerous New York City Transit senior level task forces are continually working on ways to improve the level of service to customers and reduce delays. In particular, the Division of Operations Planning and the Department of Subways, prior to and during the audit period, already had several service performance work groups, committees, and initiatives established that were charged with developing action plans and initiatives based on analyses of delay causes. These efforts continue to the present day. These groups include:

- Department of Subways Senior Vice President Monthly Operational Performance Reviews—examine trends in service performance indicators
- Department of Subways/Operations Planning Delay Management Committee—coordinate key service improvement initiatives and studies, especially those spanning multiple New York City Transit departments
- Department of Subways Rapid Transit Operations Weekly and Bi-weekly Service Performance Meetings—review On-Time Performance and operational infractions for the week in question where each District General Superintendent explains reasons for negative performance and discusses strategies and initiatives to mitigate problems
- Division of Car Equipment Communications Based Train Control Incident Review Task Force—review and classify equipment failures and identify steps to reduce incidents
- Division of Car Equipment/Rapid Transit Operations Monthly Delay Committee Meetings—to reduce incidents and minimize delays to service through a wide range of issues that affect car reliability, road operations, and incident response and handling
- Division of Car Equipment R-188 Train Incident Meetings—monthly review of new equipment issues with Kawasaki Management to identify corrective actions
- Operations Planning Running Time Revisions—in-depth analyses of individual line weekday running times by time of day undertaken by OP's System Data & Research and Subways Schedules units, using Automatic Train Supervision - A Division and Integrated Train Register Activity Console/Programmable Logic

- Controller data, leading to incorporation of revised running times in subway timetables over the past several years
- Rail Control Center-System Data & Research String Line and Gap Table Working Group—pilot programs and formal training on the use of string lines and gap tables by console dispatchers to visualize gaps in service and achieve more even headways
- Rail Control Center Efficiency Study—improvements to train monitoring processes developed by System Data & Research
- Department of Subways Performance Analysis Unit—ongoing analyses of delay root causes and development of a comprehensive subway performance database
- Rapid Transit Operations Performance Reporting and Operations Analysis Group—the statistical reporting, analysis and operational support generated by this unit provides the Department of Subways and Rapid Transit Operations management the ability to measure the success of efforts to provide premium transportation service to our customers
- Division of Car Equipment Central Electronics Shop Task Force—develop electronic component design modifications by Car Equipment Engineering
- Division of Car Equipment Door Task Force—strategic upgrades to door components identified by Car Equipment Engineering to reduce failures

All of the above groups actively pursue many different formal programs, initiatives, and corrective action plans to improve service and reduce delays. The Delay Management Committee, for instance, has been working on an evolving list of service improvement initiatives, based on ongoing analyses of the major underlying causes of delays. These initiatives include a new flagging database (to plan maintenance work under traffic in advance and reduce the service impact of such work), Combined Action Teams (mobile Maintenance of Way teams with dedicated vehicles to provide a rapid response to right-of-way failure incidents during the p.m. rush, to reduce the duration and delay impact of such incidents), timetable revisions (to adjust running times system-wide to reflect actual performance and accommodate off-peak maintenance and inspection work on the right-of-way), etc.

These service performance work groups and committees report back to executive leadership on a regular basis, albeit in different formats. For example, many groups have a standing agenda, and the project managers are responsible for reporting on the status of initiatives for which they are responsible. In addition to the ongoing taskforces with respect to managing and improving subway performance, executive leadership periodically meets with the top two to three levels of the organization (referred to as “Top 50” meetings) to communicate and discuss key initiatives. For instance, the June 27, 2014 Top 50 meeting topic was subway performance and included a special discussion around performance challenges and corrective actions.

Comptroller general recommendation: We acknowledge that Subways has many issues to address to keep trains operating on time every day. However, their efforts have not reversed the continual decline in OTP, which was 72.2 percent for weekdays in the December 2014 monthly report.

Thus, Subways needs to reassess its practices and processes to identify what needs to be done to substantially improve OTP. Because OTP is impacted by many different units/divisions of Transit, senior management needs to conduct a root cause analysis to identify the underlying reasons for recurring train delays and develop corrective action plans to proactively address those causes. Such an analysis will enable officials to identify which delay categories and/or subway lines they should address in order to have the greatest impact on OTP and improve operations. Responsible Transit operating units should be required to report not only the immediate corrective actions taken, but also plans to reduce future recurrences of the same problems. To that end, Transit needs to develop formal guidance (such as bulletins, policies, instructions, etc.) that will help middle managers improve their areas of responsibility for OTP.

On-Time Performance remains an important performance indicator for operations, but disproportionate emphasis on On-Time Performance would conflict with New York City Transit's larger priorities, such as safety, efficiency, and maintenance needs. As discussed above, disproportionate emphasis on On-Time Performance would even conflict with our objective of providing the best possible service. This is another reason why Wait Assessment is our most important service performance indicator.

Conclusion

We continue to aim for improvements in processes and procedures that will make the most effective and efficient use of our resources.

cc: P. Cafiero
M. Chubak
P. Fleuranges
J. Leader
L. Tandler