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BEFORE THE
SURFACE TRANSPORTATION BOARD
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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 FEBRUARY 13, 2024 QUESTIONS

Pursuant to the Surface Transportation Board’s (“Board”) February 13, 2024 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. HOST-RESPONSIBLE DELAYS – EXCEPT SLOW ORDER DELAYS

Investigative Question. Amtrak, UP, BNSF, SCRRRA, and CN are directed to provide narrative explanations of the root causes of the “Host-responsible Delays on a Run-by-Run Basis” listed in Part I of the Appendix, consistent with the instructions provided in this decision.

Amtrak’s Response: During the Relevant Period, host-responsible delays on Amtrak-hosted portions of the *Sunset Limited* route comprised just 0.32% of all host-responsible delays, and just 0.23% of total delay minutes.¹ In its Order, the Board directed Amtrak to provide an explanation of the root cause for delays that are presented in Appendix Part I and that identify

¹ Amtrak hosts *Sunset Limited* service for 4.2 miles, between New Orleans Union Passenger Terminal (“NOUPT”) and Southport Junction.

Amtrak as the responsible railroad.² As set out in Table 1, there are five such delays.³ Each affected westbound Train No. 1 and each involved a signal delay.

Table 1
Delays Identifying Amtrak as Host Railroad in Appendix Part I⁴

Train	Origin Date	Note	From	To	Host RR	Type	Mins	Subdivision Name
1	2/08/2022	0	NOL	XSU	AM	DCS	27	NOUPT
1	3/08/2022	0	NOL	XSU	AM	DCS	9	NOUPT
1	3/11/2022	0	NOL	XSU	AM	DCS	12	NOUPT
1	3/18/2022	0	NOL	XSU	AM	DCS	6	NOUPT
1	6/03/2022	1	NOL	XSU	AM	DCS	10	NOUPT

Signal delays can occur for several reasons.⁵ For example, signal delays may be attributable to a signal failure, an unanticipated restrictive signal, or a power switch failure. When operating on NOUPT between New Orleans and Southport Junction, the *Sunset Limited* should receive restricting signals from the station platform to Control Point (“CP”) Clara Street. From there, the *Sunset Limited* should receive clear signals to Southport Junction. Clear signals permit the train to run at 30 MPH over this territory, which includes CPs North Wye and Carrollton. Once the *Sunset Limited* reaches Southport, it should receive a signal permitting it to advance without delay.

² In a subsequent order, dated April 5, 2024, the Board extended the time for UP, BNSF, SCRRA, CN, and Amtrak to provide this root cause analysis. Amtrak is nonetheless providing its response in accordance with the original schedule set by the Board.

³ As Amtrak explained in its Complaint, delays are calculated by comparing Pure Running Time and Dwell Time to the actual amount of time that has elapsed during a train’s journey. See Amtrak Complaint and Petition at ¶ 56. Amtrak does not consider Recovery Time in calculating delays.

⁴ Amtrak systems treat the *Sunset Limited* as though departing from its historic South Florida point of origin. As a result, all origin dates in Table 1 and Amtrak_STB_Native_0002 indicate a date one calendar day before departure from New Orleans. Amtrak uses the origin dates in Table 1 for purposes of this root cause analysis, but contemporaneous materials relied on show the true date of each delay.

⁵ See Amtrak’s Response to the Board’s Interrogatories and Document Requirements, Appx A-Part III at Response 1.

However, in some cases, the *Sunset Limited* receives restrictive signals after clearing CP Clara St. Those circumstances typically result in signal delays.

Amtrak has conducted a reasonable and diligent investigation of the five delays identified in Table 1. Based on that investigation, Amtrak has concluded that the delays occurred primarily because signals that Amtrak controls at CP Carrollton failed to display, signals at Southport Junction were unfavorable, or both of those circumstances arose during the run. With respect to delays driven by the failure to display signals at Carrollton, the root cause varies by delay, and Amtrak has implemented process improvements to address or mitigate those root causes where feasible.⁶ When the signals failed to display at CP Carrollton, the associated delay was sometimes compounded by an operational rule requiring trains to proceed at restricted speeds when relying on verbal authority to pass a stop. Amtrak addresses each individual delay below.

A. Signal Delay on February 8, 2022 (27 Minutes)

Based on its reasonable and diligent investigation, Amtrak has determined that the primary cause of this delay was a failure of the Vital Harmon Logic Controller (“VHLC”) at CP Carrollton.⁷ More specifically, an issue with a component of the VHLC prompted the VHLC to reset. At the time this delay occurred, the train control system required that field personnel be sent to the location to remove the blocking that was automatically applied as a consequence of the VHLC failure. The requirement that field personnel proceed to the location to remove blocking was a feature of Amtrak’s then-existing train control system. Amtrak has since implemented a new train control system, which has mitigated the need for this process.

⁶ Amtrak is also in the process of replacing VHLC units in the NOUPT field locations with newer units, which is expected to reduce the incidence of signal delays.

⁷ The VHLC is a solid state, application programmable controller designed to control wayside signals, switches, and track circuits at railroad interlocking plants. It significantly reduces the vital relays needed to control the interlocking. In addition to controlling and monitoring wayside devices, the VHLC performs the functions of most conventional code systems.

B. Signal Delay on March 8, 2022 (9 Minutes)

Based on its reasonable and diligent investigation, Amtrak has determined that there were two primary causes of this delay. Train No. 1 first encountered a signal delay because a systemwide AT&T disruption between New Orleans and Chicago disrupted remote control of the signal at CP Carrollton. Amtrak has since installed fiber optic cables to control the signal at Carrollton, although Amtrak can still rely on wireless remote control of the signal if necessary. Train No. 1 then encountered a restricted signal at Southport Junction.

C. Signal Delay on March 11, 2022 (12 Minutes)

Based on its reasonable and diligent investigation, Amtrak has determined that there were two primary causes of this delay. Train No. 1 first encountered a technical issue with the VHLC at CP Carrollton. More specifically, a feature of the VHLC's memory prompted the VHLC to display field blocks. Because of that issue, Amtrak's Train Director blocked protection from CN and required authority by Stop Signal. The technical issue that drove this failure was investigated and remediated. Train No. 1 then encountered a restricted signal at Southport Junction.

D. Signal Delay on March 18, 2022 (6 Minutes)

Based on its reasonable and diligent investigation, Amtrak has determined that the primary cause of this delay was a technical issue with the VHLC at CP Carrollton. Because of that issue, Amtrak's Train Director blocked protection from CN and required authority by Stop Signal. The technical issue that drove this failure was identical to the technical issue encountered during the March 11 delay and was subsequently investigated and remediated.

E. Signal Delay on June 3, 2022 (10 Minutes)

Based on its reasonable and diligent investigation, Amtrak has determined that the primary cause of this delay was an issue with the VHLC at CP Carrollton. More specifically, at the time

this issue occurred, the switch at CP Carrollton would throw and the outbound signal would not display when either of the track circuits adjacent to CP Carrollton showed an occupancy. Amtrak subsequently remediated this issue by updating an erasable programmable read-only memory (“EPROM”) chip in the VHLC.

III. Amtrak-Responsible Delays

Investigative Question No. 1. What is Amtrak’s strategy for reducing the incidence and duration of, avoiding any impact on passenger comfort and well-being caused by, and mitigating the effect on *Sunset Limited* on-time performance resulting from, delays due to locomotive failure (delay code “ENG”)?

Amtrak’s Response: Amtrak respectfully responds that during the Relevant Period, delays due to Amtrak locomotive issues accounted for just 1.1% of total delays and 2.2% of delay minutes on the *Sunset Limited*. Amtrak has several procedures and practices in place to reduce the incidence, duration, and impact of any delays due to locomotive failure.

Incidence of Delay. Amtrak regularly inspects train engines and performs maintenance to prevent locomotive failure. Additionally, Amtrak recently made a strategic investment to procure new locomotives. Amtrak anticipates deploying some of those new locomotives on the *Sunset Limited* before the end of this calendar year and expects that doing so will reduce the incidence of locomotive failures.

Duration of Delay. Amtrak takes several measures to reduce the duration of any delays due to locomotive failure. Those measures also mitigate the effect (if any) of locomotive failures on *Sunset Limited* on-time performance. First, all *Sunset Limited* consists include a second locomotive so that Amtrak can minimize delays should the primary locomotive experience a mechanical issue.⁸ For that reason, many delays due to locomotive failure are limited to the time that Amtrak

⁸ See Amtrak Response 4 to Board Appendix A- Part III (providing consist for Sunset Limited Trains).

personnel require to set out new equipment. Second, Amtrak has implemented protocols to address any locomotive failures that occur en-route as quickly as possible. For example, Amtrak always has two System Operations Duty Officers (“SODOs”), one each for east and west operations, to provide real-time coordination, management, and operation-critical decision making associated with train operations system wide.⁹ Third, Amtrak maintains locomotives in reserve at Los Angeles terminal. That ordinarily provides Amtrak with additional flexibility, should it need to remove a *Sunset Limited* locomotive from service for repair.

Passenger Comfort and Well-Being. Customers choosing to travel on the *Sunset Limited* line entrust Amtrak with their health and safety. Amtrak’s Service Standards Manual lays out specific protocols for ensuring the comfort and security of its passengers should their train experience locomotive failure or other significant delay.¹⁰ Amtrak addresses many of those protocols in its response to Board Investigative Question No. 44, which Amtrak incorporates by reference.¹¹ Amtrak also takes several proactive steps to communicate with customers and potential customers affected by delays due to locomotive failures. Efforts to communicate with

⁹ See Amtrak_STB_0000106 at 14-17. Amtrak also incorporates by reference its response to Board Investigative Question No. 2. See Amtrak Response No. 2 to Appendix A – Part III (addressing mitigation of unforeseen delays). Additionally, protocols dictate that the train conductor acts first to notify the relevant dispatcher (either Amtrak or host railroad), and then the dispatcher notifies the CNOC, Amtrak’s National Communications Center (“NCC”) and, where necessary, local first responders, who all confer together to identify cascading impacts, establish a common operating picture, and develop a plan to address any hazards and reestablish service. See Amtrak_STB_0000106 at 30-31, 35; see also Amtrak Response No. 2 to Appendix A – Part III (addressing mitigation of unforeseen delays).

¹⁰ See, e.g., Amtrak_STB_0000906 at 9-3, 10-8 (detailing that train personnel should regularly update passengers on operational status and when Amtrak passengers facing significant delays must be provided food and water); see also Amtrak_STB_0000106 at App’x B-15 to B-16 (detailing protocols for assessing customer needs, identifying different resource vendors, and providing customers with alternate accommodations if necessary).

¹¹ See Amtrak Response No. 44 to Appendix A – Part III (addressing communication about delays, food and beverage service, alternative travel arrangements and accommodations, and resolution of customer complaints).

customers and potential customers are addressed in Amtrak's response to Board Investigative Question No. 3, which Amtrak incorporates by reference.¹²

Investigative Question No. 2. What determines the length of time that Train No. 1 holds at San Antonio for connection with Train No. 21, the westbound *Texas Eagle*? Is there a time limit for holds for connection at San Antonio?

Amtrak's Response: Amtrak respectfully responds that it is unusual for Train No. 1 to hold at San Antonio for connection with Train No. 21. During the Relevant Period, Train No. 1 was held at San Antonio for connection just 13 times. Although each delay was recorded as an Amtrak-responsible delay, many were driven by events that Amtrak cannot control, such as freight train or third-party interference with the *Texas Eagle*.¹³

The length of time that Amtrak will hold Train No. 1 for connection with the westbound *Texas Eagle* is determined on a case-by-case basis. The determination depends heavily on the circumstances of delay and the potential impact on passengers who would miss their connections.¹⁴ It also depends heavily on the resources available to accommodate passengers who miss their connections. Evaluating these issues is complicated by the *Sunset Limited* service schedule. Because westbound service on the *Sunset Limited* only runs three times weekly, passengers who miss their connections cannot secure next-day train travel to their westbound destination. Instead, customers must wait two days to resume their travel on the *Sunset Limited*. That further delay can

¹² See Amtrak Response No. 3 to Appendix A – Part III (addressing communication to ticketed customers who have boarded a train, ticketed customers down-line, and potential customers).

¹³ For example, the four most acute delays for connection—which occurred on December 28, 2021, May 29, 2022, July 24, 2022, and October 18, 2022—were each caused by freight train or third-party interference with the *Texas Eagle*.

¹⁴ As an example, where Amtrak anticipates that service disruptions to the *Texas Eagle* will occur south of Fort Worth, and buses are available, Amtrak may terminate Train No. 21 at Fort Worth and bus passengers to San Antonio to facilitate a more timely arrival in San Antonio and connection to Train No. 1. As another example, Amtrak necessarily holds Train No. 1 if it cannot locate hotel rooms to accommodate passengers at risk of missing their connection.

have significant adverse consequences for the customer and significant adverse consequences for customer perception of Amtrak service.

Investigative Question No. 3. How much time is required at Los Angeles and New Orleans to service an inbound *Sunset Limited* trainset for the subsequent *Sunset Limited* origination?

Amtrak's Response: The amount of time required at Los Angeles and New Orleans to service an inbound *Sunset Limited* trainset for the subsequent *Sunset Limited* origination can vary based on location and trip. For example, the consist for an inbound *Sunset Limited* trainset at Los Angeles is larger than the consist for an inbound *Sunset Limited* trainset at New Orleans, and therefore may require more time to service.¹⁵ Accounting for ordinary variations in service time, Amtrak estimates that it requires between four and six hours to service inbound *Sunset Limited* trains. Extraordinary circumstances can increase that estimate.¹⁶ However, even when extraordinary circumstances arise, *Sunset Limited* trains rarely encounter further delays. In fact, during the Relevant Period, less than 1% of all delay minutes on the *Sunset Limited* were caused by the time required to turn around late-arriving *Sunset Limited* Trains at New Orleans or Los Angeles. That is because the existing schedule for equipment turns for the *Sunset Limited* trains already provides ample time to service trains at each endpoint.

IV. Site- and Party-Specific Questions

Investigative Question No. 1. When constructing the skeleton schedule for Trains 1 and 2, what was the required passenger speed assumed on the CN McComb Subdivision between East Bridge Junction and Southport Junction?

Amtrak's Response: Amtrak respectfully responds that the segment of trackage between East Bridge Junction and Southport Junction is about 2.2 miles. Amtrak's Operating Agreements

¹⁵ See Amtrak Response No. 4 to Appendix A – Part III.

¹⁶ As one example, when *Sunset Limited* trains arrive more than four hours late to New Orleans, the delay can make it especially challenging to complete service before a shift change is required.

with CN {{[REDACTED]}}.¹⁷

Timetables for this subdivision {{[REDACTED]}}
 {{[REDACTED]}} Trains 1 and 2 should require approximately 2.5 minutes to travel over this segment, assuming favorable signals. The schedule skeleton allows for 5 minutes for the segment.

Investigative Question No. 2. Has Amtrak made any request(s) to the responsible host railroad concerning the speed of the main track between East Bridge Junction and Southport from the start of the Relevant Period through the present? If so, describe those requests and responses.

Amtrak's Response: Amtrak respectfully responds that, for the specified time period and based on a reasonable and diligent search, it has not identified any responsive requests.

Investigative Question No. 3. Has Amtrak made any request(s) to the responsible host railroad concerning the operating speed over the KCS crossing diamond west of Southport Junction from the start of the Relevant Period through the present? If so, describe those requests and responses.

Amtrak's Response: Amtrak respectfully responds that, for the specified time period and based on a reasonable and diligent search, it has not identified any responsive requests.

Respectfully submitted,

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¹⁷ See Operating Agreement Between Nat'l R.R. Passenger Corp. & Grand Trunk W. R.R. Co. & Ill. Cent. R.R. Co. ("CN Operating Agreement") (Amtrak_STB_0014530) at {{[REDACTED]}}.

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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.

April 15, 2024

/s/ Jessica Ring Amunson
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