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*Bringing Together  
State Leaders from  
Across the Region  
to Advocate  
for Passenger Rail  
Improvements*

The Midwest Interstate Passenger Rail Commission is a nine-state interstate compact commission that promotes, coordinates and supports regional improvements to passenger rail service. Our member states include Illinois, Indiana, Kansas, Michigan, Minnesota, Missouri, Nebraska, North Dakota and Wisconsin.

February 8, 2016

Daniel R. Elliott III  
Chairman  
Surface Transportation Board  
395 E. Street, S.W.  
Washington, D.C. 20423-0003

Re: Docket No. EP 726

Submitted via E-file at [www.stb.dot.gov](http://www.stb.dot.gov)

Dear Chairman Elliott,

The Midwest Interstate Passenger Rail Commission (MIPRC) appreciates the opportunity to comment on the Surface Transportation Board's proposed rule regarding on-time performance (OTP) under Section 213 of the Passenger Rail Investment and Improvement Act of 2008.

MIPRC values the STB's desire to establish the most meaningful and straightforward definition of on-time performance. MIPRC's main critique of the proposed rule is that it measures OTP only at route end points, failing to ensure performance for interim station stops.

MIPRC is organized as an interstate compact that promotes, coordinates and supports regional improvements to passenger rail service. Member states include Illinois, Indiana, Kansas, Michigan, Minnesota, Missouri, Nebraska, North Dakota and Wisconsin. Our states have experienced first-hand the importance of on-time performance for intercity passenger rail service – good OTP is reflected in increased ridership; poor OTP negatively affects ridership. The Midwest experiences some of the worst OTP of passenger and freight services in the nation.

The public should be able to rely upon train schedules at intermediate stops as well as at the "final destination" of a route. Since the proposed rule does not include any definition of OTP for interim stops, it would not measure OTP in 24 states which have intercity passenger rail services, and some 90 percent of Amtrak stations. About 65 percent of Amtrak's passengers get off at intermediate stations, and they should also be able to rely on the established train schedule.

The proposed rule is also silent as to how the STB will implement a new OTP definition. MIPRC encourages inclusion of implementation procedures in the new rule.

Lastly, the rule should include some accommodation for service sponsors to be able to negotiate for more favorable service outcomes.

Thank you for your consideration.

Sincerely,

Tim Hoeffner  
MIPRC Chair

Joan Bray  
MIPRC Vice Chair

Laura Kliewer  
MIPRC Director

cc: Deb Miller, Vice Chairman, STB  
Ann D. Begeman, Member, STB