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OFFICE OF THE STATE COMPTROLLER
THOMAS P. DINAPOLI
COMPTROLLER



Metropolitan Transportation Authority

State of New York

December 17, 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
59 Maiden Lane, 31st Floor
New York, NY 10038

RE: Response to Report #2015-S-56 – Staten Island Railway: On-Time Performance

Gentlemen:

On September 15, 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

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 December 2, 2015
To Thomas F. Prendergast, Chairman and Chief Executive Officer, MTA
From James Ferrara, Interim President, NYC Transit 
Re **OSC Report 2015-S-56 SIR On-Time Performance: 90 Day Response**

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 Audit was to determine whether Staten Island Railway trains run on time and OTP is reported accurately and completely.

Comptroller Recommendation 1: Revise the definition of SIR OTP on the MTA website so that it clearly indicates that certain data is excluded from published OTP calculations and percentages.

NYCT Update: Implemented. SIR has appended the SIR OTP definition on the MTA website to note that a train will be held for the benefit of passengers transferring to or from the SI Ferry and is not recorded as a delay. The definition now states that the number "excludes delays resulting from trains purposely held for passengers connecting with the Staten Island Ferry."

Comptroller Recommendation 2: Maximize transparency and accuracy of data pertaining to actual OTP by reporting OTP statistics with Boat to the Committee and the public.

NYCT Update: We continue to disagree with this recommendation. As stated in our initial response, nearly two-thirds of SIR's weekday passengers begin or end their trips at the Ferry terminal. Therefore, trains are deliberately held to assist passengers in connecting with the Ferry. This practice may cause some trains to run later than originally scheduled, but it aids passengers in reaching their ultimate destination on time. It should be noted that our timetables are designed to connect SIR's passengers with the Ferry. If we begin to dispatch eastbound trains in accordance with the timetable, without holding trains for a delayed Ferry, or allow connecting westbound trains to take priority, most customers would be negatively impacted.

cc: P. Cafiero
M. Chubak
P. Fleuranges
W. Habersham
L. Tandler

THOMAS P. DINAPOLI
COMPTROLLER



110 STATE STREET
ALBANY, NEW YORK 12236

STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER

September 15, 2015

Mr. Thomas F. Prendergast
Chairman and Chief Executive Officer
Metropolitan Transportation Authority
347 Madison Avenue
New York, NY 10017

Re: MTA - Staten Island Railway:
On-Time Performance
Report 2015-S-56

Dear Mr. Prendergast:

Pursuant to the State Comptroller's authority as set forth in Article X, Section 5 of the State Constitution and Section 2803 of the Public Authorities Law, we examined on-time performance (or OTP) at the Staten Island Railway, a unit of the Metropolitan Transportation Authority, for the period March 1, 2013 through March 31, 2014. The objective of our audit was to determine whether Staten Island Railway trains run on time and OTP is reported accurately and completely.

Background

The Metropolitan Transportation Authority's (MTA) Staten Island Railway (SIR) operates one train line between Tottenville and the St. George Terminal, where customers can connect with the Staten Island Ferry (Ferry) to Manhattan. SIR trains run 24 hours a day, seven days a week. Organizationally, SIR reports to MTA-New York City Transit's (Transit) Department of Subways (Subways).

SIR operates its trains similar to a commuter railroad and publishes its schedule on the MTA website. The schedule is designed to accommodate the Ferry, which is operated by the New York City Department of Transportation. The minimum service frequency is every 15 minutes during rush hour periods, every 30 minutes for non-rush (mid-day and evening) periods, and every hour for overnight service.

A SIR train is on time if it arrives at its destination not more than six minutes after the scheduled arrival time. SIR officials told us that six minutes has been the established measurement for timeliness for SIR trains over the past 30 years. Train performance data is entered into a computer system at the SIR Rail Control Center near the St. George Terminal. OTP is calculated on

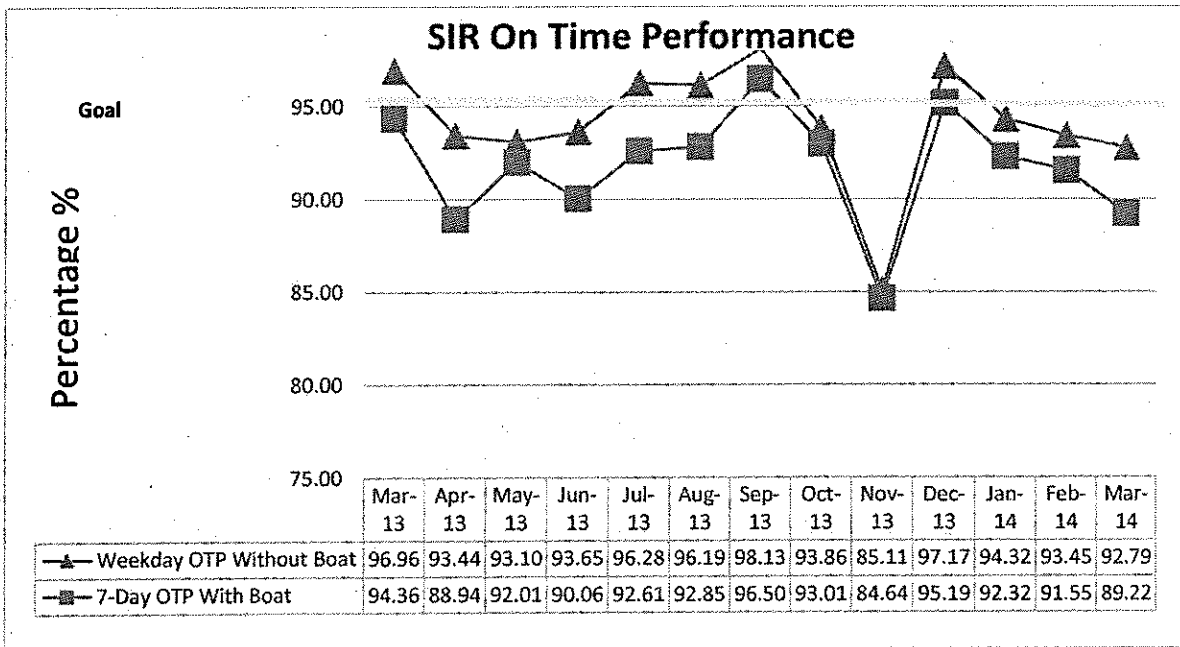
a worksheet, by dividing trips arriving on time by total scheduled trips. SIR reports weekday OTP data to the MTA Board's Transit and Bus Committee (Committee) each month. SIR's OTP goal is 95 percent.

Results of Audit

On balance, SIR's OTP approached or exceeded its standard of 95 percent. However, we also noted that SIR does not completely report the timeliness of trains to the Committee and the public. We observed that sometimes trains were intentionally held at the St. George Terminal beyond scheduled departure times to accommodate passengers disembarking from the Ferry. Also, trains headed to the Ferry were sometimes given priority over scheduled outbound departures, causing such outbound trains to be delayed. These train delays were excluded from SIR's OTP statistics because delays caused by the Ferry were not reported to the Committee and the public.

Delays directly attributed to the arrival or departure of the Ferry are charged to a category called "Boat." SIR management told us that they do not report delays by category to the Committee because that data has not been requested or required. However, SIR management maintains this information, and for the 13 months from March 1, 2013 to March 31, 2014, SIR reported a total of 3,953 train delays attributable to 13 different delay categories. Capital projects performed by contractors (1,141 delays) and the Ferry (1,064 "Boat" delays) were the two most common reasons for delays and, together, accounted for nearly 55.8 percent of SIR's total delays. (See Exhibit)

In addition, we charted the OTP percentages reported to the Committee, called Weekday OTP Without Boat (for Monday through Friday), along with the unreported, all-inclusive 7-Day OTP With Boat (for Sunday through Saturday), as illustrated by the following line graph:



The 7-Day OTP With Boat percentage was below the goal (of 95 percent) during 11 of the 13 months we examined. During those 11 months, OTP ranged from 84.64 percent to 94.36 percent. The Weekday OTP Without Boat percentage was below the goal for eight months of this period, ranging from 85.11 percent to 94.32 percent. According to SIR officials, reporting the Weekday OTP Without Boat is a more accurate indicator of SIR's OTP and is consistent with past practices. Nevertheless, such reporting excludes the fact that a material number of trains departing St. George Terminal arrive at their destinations late.

SIR On-Time performance also is reported to the public through MTA's website, which has a "Performance Dashboard" that includes SIR's OTP Without Boat percentages. The website defines SIR On-Time Performance as follows: "Number of Trains Scheduled Minus Delays / Number of Trains Scheduled." However, as with the statistics reported to the Committee, the OTP reported on the Performance Dashboard is for weekdays only, and excludes delays attributable to the Ferry (or Boat). Further, the Dashboard does not disclose that certain train delays, including those that are Boat-related, are omitted from SIR's published OTP percentages. Consequently, the public is not fully informed about the extent to which SIR trains do and do not arrive at their destinations on time.

Recommendations

1. Revise the definition of SIR OTP on the MTA website so that it clearly indicates that certain data is excluded from published OTP calculations and percentages.

(MTA officials replied to our draft audit report that they will take action to address the recommendation.)

2. Maximize transparency and accuracy of data pertaining to actual OTP by reporting OTP statistics With Boat to the Committee and the public.

(The MTA replied to our draft audit report that it will append the definition of Staten Island Railway OTP to its website, but it will not report OTP statistics With Boat. According to MTA officials, the OTP statistics With Boat would be misleading and not reflective of the customer experience.)

Auditor's Comments: To achieve transparency, the statistics reported to the public should include OTP With Boat. When a train is late, regardless of the reason, it should be reported as part of on-time performance. Customers and the committee are fully capable of understanding that at times trains are held and are delayed so that passengers can connect with the Ferry. Further, the fact that the MTA has only partially reported OTP in the past is not sufficient justification to continue to do so in the future.

Audit Scope, Objective, and Methodology

The objective of our audit was to determine whether Staten Island Railway trains run on time and OTP is reported to the Board and the public accurately and completely. Our audit

primarily covers the period March 1, 2013 through March 31, 2014.

To accomplish our objective, we reviewed policies, procedures, and guidelines related to OTP. We also reviewed documents and reports supplied to support SIR's efforts to manage delays. We performed analyses of data and conducted observations of train operations at the SIR Rail Control Center. We interviewed SIR officials to obtain an understanding of the internal controls related to SIR OTP.

We conducted our performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. In addition, the Comptroller appoints members to certain boards, commissions, and public authorities, some of whom have minority voting rights. These duties may be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our opinion, these functions do not affect our ability to conduct independent audits of program performance.

Reporting Requirements

We provided a draft copy of this report to MTA officials for their review and formal comment. Their comments were considered in preparing this final report and are attached in their entirety at the end of the report. Also, our rejoinder to certain comments made by MTA officials is included in the report's State Comptroller's Comment.

Within 90 days after final release of this report, as required by Section 170 of the Executive Law, the Chairman and Chief Executive Officer of Metropolitan Transportation Authority shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising them what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

Major contributors to this report were Robert Mehrhoff, Myron Goldmeer, Joseph Smith, Katrina Lau, and Kenneth Liu.

We wish to thank the management and staff of the Metropolitan Transportation Authority - Staten Island Railway for the courtesies and cooperation extended to our auditors during this audit.

Very truly yours,

A handwritten signature in cursive script that reads "Carmen Maldonado".

Carmen Maldonado
Audit Director

cc: M. Fucilli, MTA Auditor General
D. Jurgens, Audit Director
NYS Division of the Budget

Exhibit

**Staten Island Railway
Summary of Delay Categories
For the Period March 1, 2013 through March 31, 2014**

Delay Category	Total	Percentage
Capital Work - Outside Contractor	1,141	28.9
Ferry/Boat	1,064	26.9
Weather	806	20.4
Capital Work - SIR Employees	250	6.3
Track	192	4.9
Transportation	112	2.8
Public	104	2.6
Signal	92	2.3
All Other (See Note Below.)	192	4.9
Totals	3,953	100.0

Note: All Other includes the delay categories of mechanical, police, 3rd rail, Con Ed, and electrical engineering.

Agency Comments

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

August 4, 2015

Ms. Carmen Maldonado
Audit Director
The Office of the State Comptroller
Division of State Government Accountability
59 Maiden Lane - 21st Floor
New York, NY 10038-4651

Re: Draft Report #2015-S-56 (MTA – Staten Island Railway: On-Time Performance)

Dear Ms. Maldonado:

This is in reply to your letter requesting a response to the above-referenced draft 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. Prendergast".

Thomas F. Prendergast
Chairman and Chief Executive Officer

c: Donna M. Evans, MTA Chief of Staff
Michael J. Fucilli, Auditor General, MTA Audit Services

Attachments

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



Date July 20, 2015

To Thomas F. Prendergast, Chairman and Chief Executive Officer

From Carmen Bianco, President, NYC Transit 

Re New York State Comptroller's Request for Response to the Audit Report
"MTA - Staten Island Railway: On-Time Performance" 2015-S-56

New York City Transit has reviewed the Office of the State Comptroller's Draft Audit Report on Staten Island Railway On-Time Performance. The stated purpose of the report is "to determine whether Staten Island Railway trains run on time and OTP is reported accurately and completely."

Below is a summary of the New York City Transit response to the Office of State Comptroller's draft audit results and recommendations.

Response to Results

The Draft Audit Report states the following:

The 7-Day OTP With Boat percentage was below the goal (of 95 percent) during 11 of the 13 months we examined. During those 11 months, OTP ranged from 84.64 percent to 94.36 percent. The Weekday OTP Without Boat percentage was below the goal for eight months of this period, ranging from 85.11 percent to 94.32 percent.

The Staten Island Railway target of 95 percent was specifically set for Weekday On-Time Performance Without Boat. 7-Day On-Time Performance With Boat does not apply to this target, and it should not be judged against it.

In addition, the comparison of *Weekday OTP Without Boat performance* to *7-Day OTP With Boat performance* is misleading and does not accurately present the effect of including or excluding ferry delays, given that the measurement periods of Weekday and 7-Day are different.

Response to Recommendations

Comptroller Recommendation 1: Revise the definition of SIR OTP on the MTA website so that it clearly indicates that certain data is excluded from published OTP calculations and percentages.

* Comment 1

*See State Comptroller's Comment, page 10.

New York City Transit will append the Staten Island Railway On-Time Performance definition on the MTA website to note that a train deliberately held for the benefit of passengers transferring to or from the Staten Island Ferry is not recorded as a delay.

Comptroller Recommendation 2: Maximize transparency and accuracy of data pertaining to actual OTP by reporting OTP statistics With Boat to the Committee and the public.

The schedules of the Staten Island Railway and the Staten Island Ferry are tied together, as nearly two-thirds of SIR weekday passengers begin or end their trip at the St. George Ferry Terminal. For this reason, trains are deliberately held at times to help passengers connect to the Ferry. While this may cause some trains to run later than originally scheduled, it helps many passengers reach their ultimate destination on time. Reports on SIR delayed trains have excluded "Boat" related holds since this practice is a customer service. NYCT will append the definition of Staten Island Railway On-Time Performance on the MTA website as noted above to ensure transparency. We however disagree with the recommendation that NYCT should regularly report OTP statistics With Boat, as such figures would be misleading and not reflective of the customer experience.

Conclusion

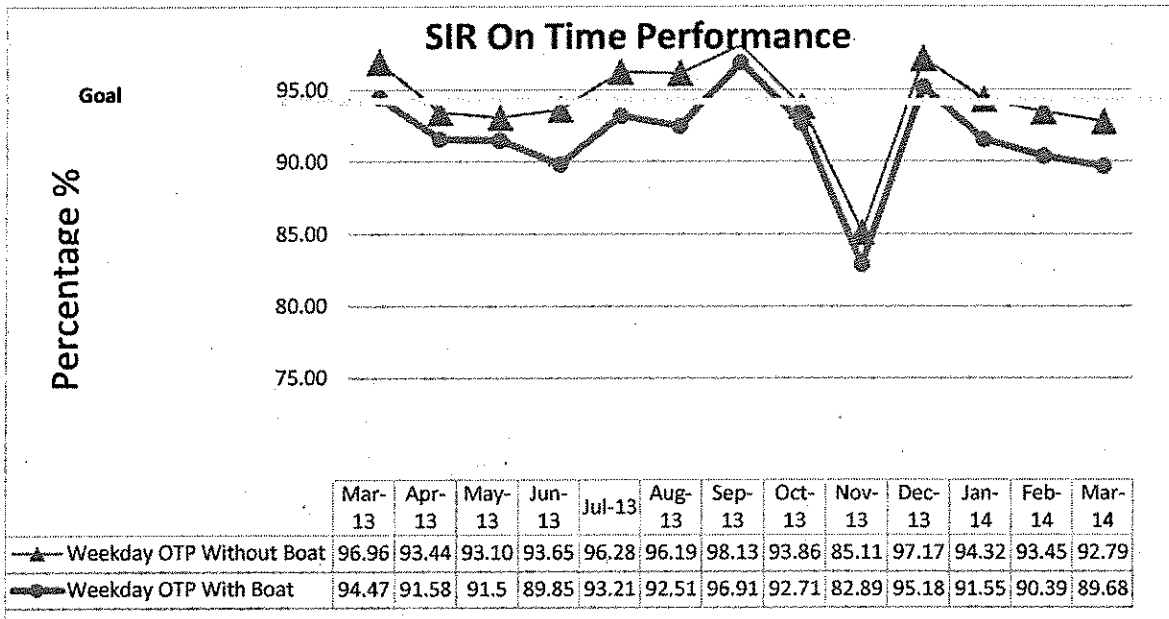
We have carefully reviewed the findings and recommendations in the Draft Audit Report and continue to aim for improvements in processes and procedures that will enhance the quality of service provided to our customers while making the most effective and efficient use of our resources.

Enclosure

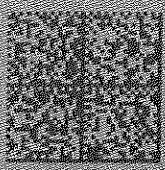
cc: P. Caffero
M. Chubak
P. Fleuranges
J. Leader
L. Tendler

State Comptroller's Comment

1. We acknowledge that the graph on page 2 of the report includes the 7-day OTP With Boat and the weekday OTP Without Boat. Also, we present the graph below, which includes Weekday OTP With Boat and Weekday OTP Without Boat. We note that the results of both graphs are very similar. Specifically, Weekday OTP With Boat (as depicted below) was below the 95 percent goal during 11 of the 13 months we examined, ranging from 82.89 percent to 94.47 percent. As noted on page 3 of the report, the 7-day OTP With Boat was also below the goal during 11 of the 13 months. For most months, the difference between 7-day OTP With Boat and Weekday OTP With Boat was less than 1 percent.



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