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JUL 26 2018

OFFICE OF THE STATE COMPTROLLER
THOMAS P. DINAPOLI
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Metropolitan Transportation Authority

State of New York

July 12, 2018

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 #2016-S-92 – MTA New York City Transit Selected Safety and Security Equipment at Subway Stations

Gentlemen:

On April 12, 2018, 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,

Joseph J. Lhota

c: Helene Fromm, MTA Chief of Staff
Michael J. Fucilli, Auditor General, MTA Audit Services

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 July 10, 2018

To Joseph Lhota, Chairman, MTA

From Andy Byford, President, NYC Transit

Re **New York State Comptroller Report #2016-S-92 – Selected Safety and Security Equipment at Subway Stations: 90 Day Response**

In response to the requirements of Section 170 of the Executive Law to respond 90 days after receipt of the above-referenced audit report from the State Comptroller, we hereby provide you with steps taken by MTA New York City Transit (NYCT) to implement the recommendations outlined in the audit report and, where recommendations were not implemented, the reasons are set forth below.

The stated purpose of the audit was to determine whether NYCT “ensures that safety and security equipment, such as cameras and Help Point Intercoms, are working, tested, maintained, and monitored.” NYCT’s Electronic Maintenance Division (EMD), a reporting unit of the Maintenance of Way Division within the Department of Subways, is responsible for maintaining and monitoring this equipment.

As stated in our initial response, NYCT does not concur with the report and findings as written. We take this maintenance duty seriously and set appropriate goals for maintaining and repairing the equipment to ensure such equipment is working, tested, maintained and monitored. We continue to maintain that the Comptroller’s premise and recommendations appear to be based on faulty analysis and incomplete information, and as such we disagree with the need for changes to our current processes.

Comptroller Recommendation #1: Reassess the training program given to new employees to ensure that it provides the appropriate level of skill to do the work, such as diagnosing and repairing defective security equipment.

NYCT Response: We continue to disagree with this recommendation, as EMD’s training program is reassessed on an ongoing basis. As new equipment comes online, we make adjustments and additions as necessary, while continuing to instruct new employees on existing equipment. Our current program provides new employees with the appropriate level of skill to do the work required.

Comptroller Recommendation #2: Focus resources on meeting preventive maintenance (PM) targets. One such option could include ensuring that, when technicians are reassigned after performing maintenance work that required immediate attention, the missed preventive maintenance tasks are given priority when technicians resume their regular schedule.

NYCT Response: We continue to disagree with this recommendation as it incorrectly implies that EMD is not adequately focusing resources on preventive maintenance. As noted in our 30-day

response, EMD establishes maintenance schedules to optimize a balance between its available workforce and equipment reliability, based on manufacturer recommendations, component age, and operating conditions. We set an aggressive preventive maintenance schedule for security equipment, and in 2016, we completed 84% of our PMs. As acknowledged in the report, however, more urgent priorities sometimes require us to reallocate staff to ensure the security of our customers and employees. For example, equipment repairs and installation, rush video retrieval requests (e.g., following the December 11 attack at the Times Square station), or PMs on police and transit radios take precedence and may result in a redirection of resources and the deferral or cancellation of certain CCTV PMs. Contrary to the Comptroller's comments, we do not "overlook" PM tasks — if we cancel a PM due to other priorities or station inaccessibility, it is based on an informed decision with minimal impact to operations.

Comptroller Recommendation #3: Ensure defective cameras are repaired timely.

NYCT Response: We continue to disagree with this recommendation as it incorrectly implies that NYCT is not repairing defective cameras in a timely fashion. The report uses EMD's three-day guideline that EMD has set for itself to repair trouble calls but correctly cites that "*EMD indicates there is no three-day requirement and that it is only a guideline. EMD aims to repair trouble calls within three days, but multiple factors affect assignments on a day-to-day basis. Higher priority work takes precedence.*" The report then includes a table showing 74 percent of total defects completed within three days and 26 percent completed after three days — and, based on this criterion, the implication is that we are not repairing defects timely.

As discussed with the Auditors, we disagree with this analysis for the following reasons:

- While the stated purpose of the audit is an evaluation of EMD practices, the auditors group together disparate camera systems that have differing levels of criticality, different maintenance requirements, and may be primarily managed by groups outside of EMD. While EMD tracks and follows up on all trouble tickets, much of the equipment (at least 15%) was either under warranty during the audit period or the responsibility of outside vendors. In these cases, trouble call response time is dictated by our vendors based upon contractual terms and conditions. It is inaccurate to group all cameras together and presume a common repair goal.
- The report fails to take into consideration legitimate reasons why some trouble tickets remain open for extended periods of time — such as construction work in the vicinity of the equipment, track access issues (especially for under-river tubes), or parts availability.

The Comptroller's comments in their final report seem to completely ignore our above response.

Comptroller Recommendation #4: Promptly establish and document a preventive maintenance schedule for Help Point Intercoms (HPIs).

NYCT Response: We continue to disagree with this recommendation to the extent that it implies a preventive maintenance schedule should be developed prior to the completion of construction of the HPI project. Throughout the audit, EMD communicated to the auditors that the HPI project was still in construction and that a preventive maintenance program, which will largely consist of periodic cleaning, will be established upon completion. Until that time, there is little increased

risk of HPI unavailability since the Help Point units, which are comprised of solid state electronic components, are remotely monitored 24/7 by our Solar Winds system, which reports the working condition of each unit. We know in real time when a Help Point is not available and can respond in a timely manner. In addition, Stations personnel conduct physical inspections every 72 hours and clean HPIs once daily. Now that construction has largely been completed, preventive maintenance schedules have been developed based upon analyzed data of failures.

Comptroller Recommendation #5: Establish an acceptable occurrence rate for each type of ticket, with a focus on "Opened in Error," to reduce these incidents.

NYCT Response: The fact that there is a high volume of trouble tickets designated "opened in error" does not necessarily represent a problem with the system nor does it degrade the effectiveness of monitoring the availability of HPIs. As noted in the report, HPIs are a new product with no historical data available. Contrary to the Comptroller's comment that MTA management has not focused any attention on these tickets, we have been reviewing and analyzing the data to determine which problems warrant opening trouble tickets and which do not. We agree that sufficient data now exists to establish a reasonable rate of occurrence. We have concluded that "Opened in Error" was an incorrect term given to trouble tickets that were not, in fact, defects. Maintenance personnel have now been trained to accurately identify and open true HPI troubles.

Comptroller Recommendation #6: Document reasons for delays in repairs to HPIs.

NYCT Response: We already comply with this recommendation. EMD documents all details in our trouble ticket system necessary for operations to repair and maintain the HPIs in a timely manner. (The detailed trouble ticket reports were provided and discussed with the audit team.) In their comments the auditors state, "They also rejected three days as being their time frame for addressing trouble calls, yet, when it is to their benefit, the time frame applies." This is a false and puzzling statement. As noted above, we have consistently maintained that we set an internal guideline to repair within three days, but it is not a mandate nor a requirement. And, per the table supplied by auditors, EMD has effectively addressed 90.4 percent of sampled HPI defects in three days or less. We provided specific explanations as to why the remaining 9.6 percent were delayed, such as awaiting parts delivery or repair by a third-party vendor. By that measure, we would deem our performance to be more than satisfactory.