



Metropolitan Transportation Authority

State of New York

November 24, 2020

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

Re: Final Report #2019-F-58 (Signal Maintenance, Inspections, and Testing)

Dear Ms. Maldonado:

This is in reply to your letter requesting a response to the above-referenced final report.

I have attached for your information the comments of Sarah E. Feinberg, Interim President, MTA NYC Transit, which address this report.

Sincerely,

A handwritten signature in black ink that reads "Pat Foye".

Patrick J. Foye
Chairman and Chief Executive Officer

c: Anni Zhu, MTA Chief of Staff to the MTA Chairman & Chief Executive Officer
Michele Woods, Auditor General, MTA Audit Services

Memorandum



Date November 17, 2020

To Patrick Foye, Chairman, MTA

From Sarah Feinberg, Interim President, New York City Transit

Re **New York State Comptroller Report #2019-F-58 – Signal Maintenance, Inspections, and Testing: 30 Day Response**

A handwritten signature in blue ink, appearing to read "Sarah Feinberg", is written over the "From" line of the memorandum.

This information is provided in response to the final audit report from the Office of the State Comptroller (OSC) on New York City Transit (NYCT) Signal Maintenance, Inspections, and Testing. The stated purpose of this follow-up audit was to assess the extent of implementation of the recommendations included in the OSC's initial report (2017-S-6, issued October 17, 2018).

Comptroller Recommendation #1: Remind Signal Maintainers and Maintenance Supervisors of logbook and iSEIS policies and guidelines.

Status per Comptroller: Partially Implemented

Status per NYCT: Implemented

NYCT Response: NYCT implemented this recommendation by issuing Directive #017-36 in October 2017 and Directive #F18-07 in February 2018, which reminded all Signals Division personnel of their responsibilities under the policies and guidelines for logbook and database entries. NYCT will issue these directives annually. Hard copies of the policies and guidelines are distributed through the local field offices, and each supervisor is required to discuss the issues outlined in the directive with all staff members. The migration from the seis system to Enterprise Asset Management (EAM) will be complete by the first quarter of 2021, and all appropriate employees will receive training as required on its use.

Comptroller Recommendation #2: Periodically review logbook entries to ensure compliance with Electrical Division guidelines and document such review.

Status per Comptroller: Partially Implemented

Status per NYCT: Implemented

NYCT Response: NYCT is unclear as to why this recommendation was identified as Partially Implemented. OSC Auditors reviewed two Signals locations and found that "the requisite (logbook) audits were performed by both units." Per procedure, each subdivision manager is required to conduct 12 audits yearly; one per month. Logbooks are selected at random for audit. Procedure does not require that we audit every logbook.

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Comptroller Recommendation #3: Timely update the SSPP to reflect any procedural modifications to the SSPP internally.

Status per Comptroller: Partially Implemented

Status per NYCT: Implemented

NYCT Response: NYCT is in compliance with this recommendation. The interval change from 90 days to 180 days was not reflected in the System Safety Program Plan (SSPP) yet because the change was under evaluation as part of a pilot program. The results of the pilot showed no detrimental effect on signal performance stemming from this interval change. Further evaluation within other parts of the system is now occurring to ensure that these results can be duplicated. Assuming that reliability is maintained at previous levels, a White Paper documenting the results and obtaining the approvals of executive management will be published prior to the second quarter of 2021, at which time the change will become formalized and incorporated into the SSPP.

Comptroller Recommendation #4: Timely document and communicate procedural changes and updates to the SSPP to the PTSB.

Status per Comptroller: Partially Implemented

Status per NYCT: Implemented

NYCT Response: NYCT is in compliance with this recommendation. 49 CFR 659 requires an annual submittal of SSPP updates to the Public Transportation Safety Board (PTSB). It also requires PTSB to review and recertify the SSPP annually. NYCT submits its annual updates to the PTSB in November and will provide a task code listing that delineates between safety-related items that are included in the SSPP and those non-safety tasks that are not included.

Comptroller Recommendation #5: Ensure iSEIS lists only valid Task Codes.

Status per Comptroller: Not Implemented

Status per NYCT: Implemented

NYCT Response: We implemented this recommendation. The OSC Auditors state that they found task codes that were not included in the SSPP. However, as noted above, not every task code is included in the SSPP. Some task codes are for operations that are not safety related and are therefore not included in the SSPP. All task codes are valid. We will provide a task code listing that delineates between safety-related items that are included in the SSPP, and those non-safety tasks that are not included.

Comptroller Recommendation #6: Review and allocate resources to ensure that all signal devices are maintained, inspected, and tested in accordance with applicable standards.

Status per Comptroller: Partially Implemented

Status per NYCT: Implemented

NYCT Response: NYCT is in compliance with this recommendation. Staffing needs associated with maintenance and testing compliance requirements are regularly reviewed, and positions are budgeted accordingly. NYCT has taken significant steps and implemented various strategies to address the labor shortage of skilled-trade titles. A new Pick was put in place, which improves the allocation of the Division's limited resources. However, our ability to ensure full compliance with schedule is limited at this time. Based on our budget models, full compliance would require a

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significant increase in budgeted headcount, which is unlikely to occur during this financial crisis. We will continue to prioritize maintenance to ensure that all critical activities are performed within schedule.

Comptroller Recommendation #7: Ensure inventory of parts is up to date to prevent delays in repairs.

Status per Comptroller: Implemented

Status per NYCT: Implemented

Comptroller Recommendation #8: Ensure weekly reports are submitted, reviewed and approved timely, and develop procedures to address when reports are submitted.

Status per Comptroller: Not Implemented

Status per NYCT: Implemented

NYCT Response: We implemented this recommendation. NYCT issued Directive #F18-08 in February 2018 reminding employees of proper procedures. In conjunction with EAM, NYCT has revisited its procedures for capturing inspection data, and relevant reports are now automatically generated based on defined intervals.

Comptroller Recommendation #9: Review the resources allocated to the Compressor Squad and the logistics of assignments and equipment.

Status per Comptroller: Implemented

Status per NYCT: Implemented

Comptroller Recommendation #10: Develop and document the following for new technology equipment:

- *Written procedures or responsibilities for staff in charge of the trouble call desk to ensure consistency and continuity in services for each tour, and*
- *Standards for handling trouble calls and documenting the actions taken, including when follow-up is required.*

Status per Comptroller: Not Implemented

Status per NYCT: Implemented

NYCT Response: NYCT agreed with and implemented these recommendations. As of December 2018, all Signal trouble calls are being tracked and documented in a consistent fashion within the EAM system. EAM training includes documented procedures regarding trouble calls. The OSC Auditors' comment noted incorrectly that "there was no indication that anyone had attended training." We can provide a list of attendees upon request.

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Comptroller Recommendation #11: Ensure all changes to maintenance interval levels comply with NYCT policies and procedures

Status per Comptroller: Not Implemented

Status per NYCT: Implemented

NYCT Response: NYCT agrees with this recommendation and has subsequently revised its Master List change procedure and forms to ensure compliance with policy. This new procedure was issued February 2019 and more clearly defines the approval requirements for interval changes.

Comptroller Recommendation #12: Revise the Master List Change Form to require that the originator and the approver state the reason for the change and attach supporting documents.

Status per Comptroller: Implemented

Status per NYCT: Implemented

Comptroller Recommendation #13: Require that all Master List Change Forms be approved by the Engineering Division.

Status per Comptroller: Partially Implemented

Status per NYCT: Implementation not necessary

NYCT Response: NYCT continues to maintain that only changes that may impact safety require Engineering Division approval. Routine maintenance interval changes are based on recommended practices from operations staff, including the maintenance division, which has first-hand understanding of asset performance.

Comptroller Recommendation #14: Periodically review Supervisory Inspection form records to ensure compliance with procedures.

Status per Comptroller: Partially Implemented

Status per NYCT: Implemented

NYCT Response: We implemented this recommendation. The report noted that three of 129 paper inspection forms could not be provided, and one of 10 Supervisory Inspection Forms documenting that the inspections were done could not be provided. NYCT acknowledges that the paper documentation was likely misplaced. To address this issue, Supervisor level inspections and testing are planned for cutover from iSEIS to EAM by the first quarter of 2021. EAM will automatically issue work orders to Supervisors direct to their mobile applications to perform the required inspections, eliminating the paper requirements and increasing compliance with schedule.

Comptroller Recommendation #15: Develop reporting systems which alert management personnel of instances of non-compliance with supervisory inspections.

Status per Comptroller: Partially Implemented

Status per NYCT: Implemented

NYCT Response: As stated in the 30-day response, NYCT agreed with this recommendation. The EAM system now has reports that can be auto generated or run manually that identify all instances of non-compliance.

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Comptroller Recommendation #16: Periodically review logbook entries and information recorded in the Supervisory Validation to ensure compliance with departmental guidelines.

Status per Comptroller: Partially Implemented

Status per NYCT: Implemented

NYCT Response: NYCT agreed with this recommendation and a revised Supervisory Validation Procedure was issued in January 2019

Comptroller Recommendation #17: Implement a control in iSEIS to check whether Signal Maintainers have been proficiency tested within the prior six months every time a device test is entered.

Status per Comptroller: Not Implemented

Status per NYCT: Implementation not necessary

NYCT Response: NYCT disagrees with this recommendation due to the replacement of iSEIS with the EAM system. This functionality will exist in EAM.

Comptroller Recommendation #18: Develop a perpetual inventory system for signal maintenance equipment.

Status per Comptroller: Partially Implemented

Status per NYCT: Implemented

NYCT Response: NYCT agrees with this recommendation. As part of the EAM rollout in Signals, the equipment inventory has been expanded beyond capturing all signal locations. Now each signal location is broken down into the component parts, including stop arms, switch machines, insulated joints and track circuits, where applicable. The current inventory of signal equipment now includes over 110,000 pieces of equipment. The inventory is continuing to be enriched daily as staffing levels allow.