

# Memorandum



**New York City Transit**

**Date** March 17, 2021

**To** Patrick J. Foye, Chairman, Metropolitan Transportation Authority

**From** Sarah E. Feinberg, Interim President, MTA New York City Transit

A handwritten signature in blue ink, appearing to read "Sarah E. Feinberg".

**Re** **New York State Comptroller Report “Subway Wait Assessment” 2019-S-62: 180-Day Response**

In response to the requirements of Section 170 of the Executive Law to respond 180 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.

1. *Recommendation 1: Calculate system-wide WA performance based on all subway stations rather than timepoint stations. In the interim, disclose that WA is calculated based on only timepoint locations.*

NYCT disagrees with the first part of this recommendation. The primary purpose of WA at present is to allow historical year-on-year comparisons, not to best represent service quality at all stations. When NYCT began reporting WA in 2000, full electronic train movement data was not available on either the A or B Divisions. As a result of this data limitation, NYCT calculated WA based on a sample of observations taken at timepoints, because those are the only locations (other than terminals) where there are scheduled arrival times. Even though, over the past decade, electronic train location data has become available systemwide, we do not agree that it would be appropriate to alter the WA algorithm. Calculating WA using the same methodology is important for continuity and evaluation of historical trends. Even if NYCT were to rerun historical WA with data for all stations, for the B Division this would only be possible going back to late 2017, and on the A Division back to beginning of 2012, when full electronic data for those lines became available. This would introduce a difference in WA methodology before and after these points, breaking the comparability of WA across its reported history.

For years after full electronic data became available, new customer-focused performance metrics, which measure performance at all stations, better capture customer experience using the system than legacy metrics like WA. While it is true that the customer-focused performance metrics rely on a series of simplifying assumptions, necessitated by the incompleteness of MetroCard data and computational limitations, these assumptions are publicly stated on the [MTA Subway Dashboard help page](#), under “How are each of the indicators calculated? → Additional Platform Time/Additional Train Time/Additional Journey Time/Journey Time”. Furthermore, as described in NYCT’s 180 day response to the auditors’ report on the customer-

focused performance, NYCT performed a sensitivity analysis of the customer metrics with respect to ridership input data that indicated the uncertainty introduced by the assumptions and limitations of NYCT's subway ridership model is generally much smaller than the reported trends in the metrics over time, in turn implying that trends in reported APT, ATT, and CJTP are meaningful indicators of subway performance as experienced by NYCT's customers.

NYCT does agree, however, with the need for transparency with respect to the calculation of WA and has already taken steps to disclose details of the WA methodology. As mentioned in the previous response, NYCT has already implemented the second part of this recommendation. The description of WA on the public dashboard and in Board materials has been updated to specify that the metric is measured at timepoints.

- 2. Recommendation 2: Provide the public with the Supplemental Schedule that is used to calculate WA. Only include intervals that are in accordance with NYCT Service Guidelines in the WA calculation and in the interim, disclose that headways may not be in accordance with the Guidelines.*

NYCT agrees that the public should be notified of service changes, but disagrees that any additional action is needed with respect to the first part of this recommendation. Planned changes to service are already available to the public in advance, through the "Planned Service Changes" section of [www.mta.info](http://www.mta.info). Customers are also advised of planned work as it is happening in the "Service Status" box on the website's home page. In addition, NYCT provides and updates daily a supplemented GTFS feed for the subway (available in machine-readable form for use in third-party applications) which accounts for scheduled service diversions for the following seven days. This information allows customers to plan ahead in response to subway service changes, and it is why NYCT evaluates performance relative to supplemental schedules, rather than the base schedule only.

NYCT disagrees with the second part of the recommendation. In addition to the concerns already explained with altering WA given its role as a historical comparison metric, NYCT also disagrees with any suggestion that scheduled headways greater than the policy maximum headways are not in accordance with the service guidelines. The service guidelines call for maximum headways *where operationally feasible*. For example, the service guidelines allow that work on the right-of-way may necessitate headways greater than what are called for by the policy maximum headways. Similarly, guidelines allow for variations in headways that may exceed the maximum headways for other operational reasons, such as allowing for other routes (sometimes on different scheduled headways) to share the same tracks. Such headways are still in accordance with the guidelines because it is not operationally feasible to maintain the policy maximum headways. For example, when a section of track is closed for maintenance, routes that normally do not share tracks are often scheduled to operate on a shared track segment around the closed track section. NYCT may schedule some headways at greater than policy maximums in these situations, so that service on the shared trackage does not exceed the maximum track capacity. As such, it is fully appropriate for WA to be based on headways greater than the policy maximum headways where operational considerations so dictate. In

addition, NYCT believes transparency is undercut if the agency reports WA for only a subset of intervals.

3. *Recommendation 3: Provide weekend WA statistics on the dashboard.*

NYCT disagrees with this recommendation and has not implemented it. As noted in the prior response, Operations Planning (OP) considered adding Weekend Wait Assessment to the dashboard, but decided against it. Because WA is a legacy metric, we do not believe that it is an efficient use of limited staff resources to develop and implement this metric on the dashboard. It should be noted that Weekend Wait Assessment results are publicly available online in the meeting materials of the Transit Committee of the MTA Board and can be found at <http://web.mta.info/mta/news/books/>.