



January 7, 2022

Mr. Janno Lieber
Chair and Chief Executive Officer
Metropolitan Transportation Authority
2 Broadway, 20th Floor
New York, NY 10017

Re: 180 Day Response to OSC Report 2019-S-55 (Response Planning for Unexpected Events)

Dear Chair Lieber:

This is a follow-up to the Office of the New York State Comptroller report issued in June of this year on Response Planning for Unexpected Events. Metro-North Railroad (MNR) has taken several steps since the issuance of this report to improve and strengthen our response to unexpected delays or events, which was the primary focus of the MNR related findings.

As part of the larger MTA Transformation and effective as of October 1, 2021, the customer communications functions previously performed by Metro-North are now the responsibility of several units within the consolidated MTA Communications Tower. Metro-North continues to work closely with MTA Communications leadership and staff to ensure a successful transition of duties with a focus on accurate and timely customer communications.

Updates to the original recommendations are as follows:

Recommendation 1:

Ensure Metro-North personnel follow all procedures in the applicable manuals.

MNR Response to Recommendation 1:

MNR agrees with this recommendation and will reinstruct appropriate staff to ensure all procedures are followed.

Implemented - MNR has provided reinstruction to personnel on the applicable procedures and manuals for responding to unexpected or unplanned events. As an example, review of emergency and communications procedures is provided as an element of annual training for Conductors, Locomotive Engineers and Rail Traffic Controllers (RTCs). These employees are also

regularly observed and audited for compliance with the procedures and other operational rules by MNR's Conductor Compliance unit (Conductors), the Road Foreman's Office (Locomotive Engineers) and a newly created unit for OCC Compliance (RTCs).

Additionally, MNR operating departments routinely review the handling of unplanned events to ensure that the procedures are followed by all employees required to respond to an event. MNR takes appropriate action to promptly remedy and/or address any occurrences of employee non-compliance and will continue to provide recurring reinstruction on the procedures and manuals in effect. MNR believes that this recommendation has been satisfied and no additional actions are required.

Recommendation 2:

Revise procedures for train crew members and the OCC to include keeping a record of the timing of announcements to customers to ensure they are made in a timely manner.

MNR Response to Recommendation 2:

MNR does not agree with this recommendation. MNR will continue to ensure all train crew members make the required announcements, but keeping a real-time record of these announcements and associated timing is unrealistic. It is important to note that announcements are only one part of their responsibility during service disruptions and their focus must remain on the overall safety of customers.

Update - MNR maintains our disagreement with this recommendation. MNR does not believe that this is a tenable nor reasonable suggestion, particularly because train crews are primarily responsible for the ensuring safety of customers and train operations during an unplanned or emergency situation. While announcements to customers during service disruptions is important, requiring a real-time record of every announcement and the associated timing of them is unduly burdensome and may result in adverse safety consequences that MNR is not willing to risk.

Recommendation 3:

Revise policies and procedures to clearly specify when an initial customer notification must be sent and exactly how often updates are to be sent after the initial notification when there are longer delays.

MNR Response to Recommendation 3:

MNR already complies with this recommendation. MNR currently has policies and procedures which specify when an initial customer notification must be sent and exactly how often updates are to be sent after the initial notification during major service disruption events.

Update - As part of the consolidated (transformed) MTA Customer Communications functions, customer notification standards are being reviewed across all MTA operations with the goal of shortening the alerts and notification times to MTA customers to enhance the customer experience.

Recommendation 4:

Develop a system to ensure notifications are being sent at the required time intervals.

MNR Response to Recommendation 4:

MNR agrees with this recommendation and will work to develop a system to ensure notifications are being sent to customers at the required intervals during major service disruption events.

Update - Prior to transformation, major staff reductions were made that reduced head count from 12 managers down to the present 4, and 3 different teams combined into one. In these reductions Metro-North lost staff for overnight coverage for disruptions and now relies on an on-call system but only for major incidents. Post transformation, we are working to hire additional staff and have plans to increase our coverage hours and shorten the interval from knowledge of an incident to customer notification. With new staff, we will be able to have managers focus on issuing customer notifications rather than the current arrangement that requires managers to split their time between managing the customer contact center, administrative duties and monitoring service. These initiatives will be driven by the MTA Communications Tower.

Recommendation 5:

Update procedures for notifying EMTF members of the declaration of an OCC code using the established specific mail group for members of the EMTF to ensure all are specifically notified in the event a code is declared, upgraded, or discontinued.

MNR Response to Recommendation 5:

MNR agrees with this recommendation and will review and update EMTF Notification Protocols as needed.

Implemented - MNR implemented this procedural recommendation and has added all EMTF members to the OCC code email communications for direct notification when a code is declared, upgraded, or discontinued. This electronic notification is consistent with the existing MNR Employee Emergency Instructions and we believe no further action is required.

Recommendation 6:

Forward all events to the responsible departments.

MNR Response to Recommendation 6:

MNR already complies with this recommendation. MNR will reinstruct appropriate staff to ensure events are forwarded to the responsible departments. In certain situations, where multiple customer complaints are received about the same event, all duplicative communications do not need to be forwarded to the responsible departments.

Update - MNR utilizes email updates from the OCC Chief's Desk to inform operational departments about unplanned or emergency situations. This email distribution is a centralized method of directly communicating operational incidents and events to the responsible departments, as well as the updates, response action and conclusion of the incident, as applicable. Additionally, enhancements to the communications process will be a part of the staff training on the use of the agency's new customer relationship management system, Salesforce CRM, which is expected to be implemented by the end of Q1 2022 through MTA Communications.

Recommendation 7:

Provide customers with timely responses that focus on answering the issues raised in the complaints.

MNR Response to Recommendation 7:

MNR agrees with this recommendation and will continue to ensure customers get timely responses to any issues raised and ensure our internal procedures are updated to include a focus on ensuring a direct response to the issue raised.

Update - This recommendation will be reinforced as part of staff training on the use of the agency's new customer relationship management system, Salesforce CRM, which is expected to be implemented by the end of Q1 2022 through MTA Communications.

Recommendation 8:

Document and maintain the minutes and recommendations of all lessons learned meetings and the corrective actions taken in response to unexpected or unplanned events.

MNR Response to Recommendation 8:

MNR is already in full compliance with the requirements of FRA regulation 49 CFR §239.105 including the debrief and critique requirements. MNR will work to enhance the documentation of debriefings, critiques and lessons learned as well as the corrective actions taken in response to major unexpected events.

Update - MNR is governed by the regulatory requirements for Passenger Train Emergency Preparedness under 49 CFR Part 239 for major unexpected events, which require railroads to conduct a debriefing and critique session after certain passenger train emergency situations. Members of the EMTF and selected operations personnel participate in the debriefing and MNR is required to keep a record of this session and update our Emergency Preparedness Plan, if necessary, following the debriefing. To be clear, this protocol is required for serious emergency situations such as derailments, evacuations, security threats, etc. However, other less serious unexpected events or emergency situations that are not subject to the regulatory requirements are reviewed and discussed with similar objectives within the operating departments. MNR believes that we have met this recommendation and will continue to enhance the documentation and follow-up on corrective actions for all unexpected events.

Recommendation 9:

Notify the departments of all events and, as the event unfolds, each department will determine the appropriate response and dispatch personnel to the scene.

MNR Response to Recommendation 9:

MNR already complies with this recommendation. MNR currently dispatches all appropriate personnel to the scene.

Implemented - The use of the OCC Chief's Desk email distribution facilitates prompt notification directly to the responsible operating department(s) to dispatch the appropriate personnel to the scene of the event. The Chief's Desk email also provides updates and tracks the progress of the response to the event until it is closed out. We believe this method of communication is effective and meets the recommendation's objective.

Sincerely,

A handwritten signature in blue ink that reads "Catherine Rinaldi". The signature is written in a cursive style.

Catherine Rinaldi

cc: M. Woods
J. Vonashek
N. Gilbertson
S. Sarch
K. Coughlin
S. Meyer
K. Call
C. Papandreou
J. Rosado
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