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STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER

June 18, 2025

Janno Lieber
Chairman and Chief Executive Officer
Metropolitan Transportation Authority
2 Broadway
New York, NY 10004

Re: Implementation of Train Service
to Grand Central Madison
Report 2023-S-28

Dear Mr. Lieber:

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 have conducted an audit of the Metropolitan Transportation Authority's (MTA) Long Island Rail Road (LIRR) to determine whether LIRR implemented train service to Grand Central Madison (GCM) terminal in a manner that addressed customer needs. We also determined whether LIRR addressed passenger concerns in General Order #202 effective September 5, 2023. This audit covered the period from January 2021 through November 2023.

Background

MTA is responsible for developing and implementing a unified mass transportation policy for New York City and Dutchess, Nassau, Orange, Putnam, Rockland, Suffolk, and Westchester counties. MTA carries out these responsibilities directly and through its six agencies and MTA Headquarters, including LIRR. As the busiest commuter railroad in North America, LIRR reported carrying an average of 200,000 customers each weekday on 947 trains as of August 2024. It operates trains 24 hours a day, 7 days a week, with limited service during the overnight hours. LIRR comprises over 126 stations and 700 miles of track on 11 branches. It stretches from Montauk on the eastern tip of Long Island and extends to major NYC terminals, including Penn Station, GCM, Atlantic Terminal, and Hunterspoint Avenue, through a major transfer hub at Jamaica. The Port Washington branch does not pass through Jamaica. See the following page for a map of LIRR.

MTA's East Side Access (ESA) project connected Queens with Grand Central Terminal in Manhattan at a cost of approximately \$11 billion. The planning phase of the ESA project began in 1998, and construction began in 2001. Construction to connect ESA to an existing tunnel between Manhattan and Queens began in 2007. Shuttle service to GCM, part of the ESA project, began on January 25, 2023, and full service was implemented on February 27, 2023.

GCM was constructed as a new eight-track terminal with four western and four eastern tracks built to extend LIRR service to the east side of Manhattan (see Exhibit A). It was projected to cut commute time by as much as 40 minutes per day (round-trip) for some customers and ease overcrowding at Penn Station. The MTA Grand Central Madison Concourse Operating Company is responsible for managing the terminal.

LIRR Route Map



Source: MTA Railroads, <https://www.mta.info/map/22461>

LIRR's Service Planning department is responsible for scheduling train service, creating service timetables (tables of train departures and arrivals), and publishing branch schedules. The Service Planning department consists of two components: Projects and Production. Projects conceptualizes and analyzes possible improvements to the LIRR system 2-3 years out, then passes those concepts along to Production. Production includes the Timetable, Equipment, and Crew units, which work together to finalize and publish schedules within set deadlines.

A General Order on a railroad contains changes to rules, timetables, or other instructions. General Orders are issued and signed by an authorized official and cover regulatory requirements such as reporting railroad accidents; clearances for side and overhead structures, parallel tracks, and crossings; and posting railroad timetables and changes. Service Planning's General Order Implementation Timeline includes a process of negotiations with the Maintenance of Equipment, Engineering, Transportation, and Customer Engagement departments. Each department provides information such as availability of equipment and crew, scheduled track work and infrastructure, union guidelines, and customer feedback to help Service Planning plan its service. Service Planning also uses ridership data (number of riders, not ticket sales) in its planning. During our audit period, LIRR issued four General Orders:

- #101 – May 23, 2022 through February 26, 2023
- #102 – February 27, 2023 through May 21, 2023
- #201 – May 22, 2023 through September 4, 2023
- #202 – September 5, 2023 through November 12, 2023

Results of Audit

We found that, in preparation for implementing the initial GCM service on February 27, 2023, LIRR officials used passenger ridership data, consultant survey information, and other factors to develop the timetable. MTA/LIRR officials also solicited customer feedback on the proposed schedule at public hearings held from June 23, 2022 to August 11, 2022. The feedback reflected customer need for more LIRR service, service availability issues, the desire for the schedule to remain unchanged, customer service improvement suggestions, issues with

Atlantic Terminal service, and customer questions. However, there was no documentation of what LIRR officials did to address any specific customer needs voiced at the public hearings beyond those regarding the Port Washington branch—described as the most vocal branch—which LIRR officials noted and documented as being addressed in a timetable revision.

LIRR officials touted that post-GCM implementation, they were offering 41% more train service—up from 665 trains to 936 trains. However, we compared the prior General Order train service to the newly implemented service and found only a 23% increase in service across all branches. Of the 271 trains added, only 153 trains represented increases in branch service. The remaining 118 trains were shuttle trains to Brooklyn and did not provide additional branch service. LIRR changed how Atlantic Terminal service was delivered by stopping direct service trains to the Atlantic Terminal and instead offered shuttles, which enabled riders to transfer in Jamaica to the Atlantic Terminal (see Exhibit B).

Further, while LIRR officials stated they take passenger concerns into account when making changes to the schedule, the changes implemented may not support customer needs, as some passengers may have been required to change their travel times, increasing wait times and adding more steps to their trips where direct service was eliminated. LIRR also did not document and could not support that changes made adequately factored in passenger feedback. We noted the top, most common customer concerns remained the same between the public information sessions and the customer feedback received after the implementation of GCM: desire for more service/issues with availability of service, specific service improvement suggestions, and Atlantic Terminal service concerns.

Overall, the new timetable did not always address passenger needs as LIRR officials said it would. For a sample of five LIRR branches, in the new timetable from September 5, 2023 to November 12, 2023, there was not always adherence to the 60:40 ratio (60% of LIRR customers prefer to go to Penn Station and 40% prefer GCM), and service frequency did not meet the level of service required during General Orders #101, #102, #201, and #202 (see Exhibit C).

Additionally, the percentage of riders to vehicle capacity increased, with 28 of the 164 AM Peak trains above the 90% threshold. Service Planning adjusted the number of cars or added trains for four of the 28 to remedy the situation. However, where vehicle capacity was low (below 70%), there was no documentation of steps taken to change the number of cars.

Customer feedback is received through other means such as the MTA website, media, and contact center. Feedback cases are assigned case numbers and are expected to be reviewed, categorized, and assigned to a manager for processing within 24 hours (on weekdays). Further, each case is expected to be closed within 14 days. However, we found that 45 of the 247 sampled cases were not resolved within the 14-day time frame requirement.

Customer Feedback

Public Information Session

During the period from June 23, 2022 to August 11, 2022, MTA held public information sessions on service to GCM to solicit feedback from customers regarding the draft timetables for GCM implementation. We requested documentation to support LIRR Service Planning reviews and decisions as to how the public hearing information was used for the start of GCM service. However, Service Planning officials did not have documents to support a review of those comments. In the absence of information from LIRR, we selected a judgmental sample of five of

the 11 LIRR branches (Babylon, Long Beach, Port Jefferson, Port Washington, Ronkonkoma) and reviewed 1,229 of the 2,031 customer comments related to the five sampled branches and found that 725 comments either requested additional service (403) and/or asked to leave service as it was (322) (see Exhibit D).

According to LIRR officials, they adjusted the timetable in General Order #102 (February 27, 2023 to May 21, 2023) to address the concerns of customers from the “most vocal branch,” Port Washington, which they stated were addressed in Revision 9 within General Order #102. However, no documentation was provided to show how the comments related to the other sampled branches, if they were addressed, or, if no action was taken, why.

Customer Engagement

In addition to the public hearings, customer feedback is also received through other means, such as the MTA website, media, and contact center. Feedback cases are assigned case numbers and those that are not resolved by initial intake are forwarded to Customer Engagement, where they are expected to be reviewed, categorized, and assigned to a manager for processing within 24 hours (on weekdays). The manager is expected to close the case within 14 days. Additionally, some cases are forwarded to other departments for resolution. For example, cases regarding persons with disabilities may be forwarded to the Americans with Disabilities Act (ADA) Coordinator. Service Planning receives cases regarding train service to determine whether they can adjust the timetable to accommodate the customer’s concern. The decisions and/or actions of the department need to be documented.

To determine whether the cases were closed within 14 days, we selected a judgmental sample of 247 of 6,702 unique customer feedback cases for five branches (Babylon, Long Beach, Port Jefferson, Port Washington, and Ronkonkoma) from January 1, 2022 to August 23, 2023. These cases were selected from seven case categories based on the nature of the concern, such as comfort, ADA accessibility, and schedule and service planning.

When we reviewed the files for these cases, we found that 45 of the 247 cases were not closed within the 14-day time frame requirement. We also noted that 52 of the 247 cases were directly related to schedules and service planning and fell into four main categories: crowded trains, direct service to Atlantic Terminal, additional stops, and less service per hour. Those 52 cases were forwarded to Service Planning, one of which was forwarded on to the ADA Coordinator and addressed. Service Planning did not provide documentation to show what it did with the cases.

Customer Engagement also received 11,920 comments from January 1, 2022 through August 23, 2023 and forwarded nine files, containing 3,992 customer comments regarding the service provided, to Service Planning. We forwarded the files to Service Planning and requested documentation to support its actions (e.g., the decision whether to make a service adjustment or not). Officials told us they selected a sample of the feedback based on themes from two of the nine emails and provided a response that reasonably addressed customer concerns. However, for one email that contained 207 customer comments from February 8, 2023 through February 13, 2023, no documentation was provided to show whether the feedback was reviewed or actions were taken to address customer concerns. Officials stated that no action had been taken because service was due to be implemented on February 27, 2023 and there was not enough time to adjust. Officials advised us that these comments would be addressed in the timetable change in September 2023.

We noted that customer concerns from the public hearings and the comments received by Customer Engagement from August 16, 2023 through November 5, 2023 showed similar concerns. According to LIRR officials, the new timetable issued September 5, 2023 was going to address customer comments regarding GCM service implementation. However, when we reviewed all 710 pieces of feedback from customers on the five sampled branches, it showed that the common customer concerns remained the same between the public information sessions and the customer feedback received after the implementation of GCM: desire for more service/issues with availability of service, specific service improvement suggestions, and Atlantic service concerns (see Exhibit E).

While Service Planning officials advised us that documentation of service changes is captured in General Notice changes, General Orders, Crew Book revisions, and Equipment Manipulation revisions, they added that they do not keep a running spreadsheet containing the reasons for service changes because it is not their practice to document service-planning decisions. We stated that the absence of formal procedures or informal notes about Service Planning practices presents a risk that new personnel joining Service Planning will not have processes documented. Instead, as part of their succession planning, they told us they ensure that the individuals taking over the job have the experience, skills, and knowledge, and are fully prepared to handle the job efficiently and effectively.

In the absence of clear requirements and direction, there are factors of service planning that may not be consistently applied.

Train Service

LIRR officials stated that General Order #102 required 936 trains for the implementation of GCM service. Officials touted that this resulted in an increase of 271 trains or 41% over the 665 trains in General Order #101. However, we found that only 153 of the 271 trains were for branch service—representing only a 23% increase in service. The remaining 118 trains were for Brooklyn shuttle service from Atlantic Terminal to the Jamaica station. The shuttle did not provide additional branch service. LIRR changed how Atlantic Terminal service was delivered by stopping direct service trains to the Atlantic Terminal and instead offered shuttles, which enabled riders to transfer in Jamaica to the Atlantic Terminal.

Part of the increase in scheduled service was accomplished by returning approximately 100 older model cars (M3) to service. In addition, 14 newer model cars (M9) were added to the fleet from July 20, 2022 to January 25, 2023. Additionally, for General Order #201, as of May 9, 2023, LIRR added 12 more M9 cars to the fleet.

LIRR discontinued its practice of printing public schedules that were available at stations and terminals. Since GCM was implemented, schedules are available on the MTA website but only in English and are not printer friendly. Customers who rely on a printed schedule could find it challenging to plan a trip. The new schedules do not show the connecting train times at western terminals (Penn Station and GCM) as pre-GCM schedules did, so both a branch timetable and a City Zone timetable, the specific schedule for LIRR trains operating within the City Terminal Zone, are needed to determine approximate arrival/departure times when connecting. Customers can also plan their trips on the TrainTime Application (on smartphones), which can be viewed in six languages, or on the MTA website. This may also be a challenge to non-tech savvy customers or those without a smartphone.

The change in train numbers was not communicated to customers accustomed to their previous train numbers and times. Additionally, there are two trains between Atlantic Terminal

and Long Beach in the Public timetable (General Order #102) where the times at stops in Brooklyn are not included.

Clearer communication about changes intended to improve services may provide customers with a better understanding of why the service changes were made.

Recommendations

1. Process and close out customer feedback cases within the expected time frame.
2. Develop a formal mechanism for documenting the receipt and assessment of comments from the public regarding proposed train schedules or other service-planning issues.
3. Document actions taken to revise or adjust service and/or the decision not to take action in response to customer feedback.
4. Revisit the process to identify the feedback essential to service-planning decisions and document all essential decisions to ensure the efficiency of future decision-making.
5. Communicate service improvements in more detail to provide customers with more relevant information, such as types of service and branches affected.

Scheduling Process/General Orders

According to LIRR officials, Service Planning generally starts with the old timetable to prepare a new timetable. For the implementation of GCM service, officials advised us they “threw out” the old timetable and started at square one, stating that with the increase in the number of trains, the pre-GCM and opening day timetables were vastly different. Another difference was the change from direct transfers to transfer opportunities (customer moves from one train to another, and, based on the schedule, the customer has enough time to get to their next train), meaning that trains no longer waited for connections.

LIRR officials gave us their Service Planning General Order Implementation Timeline, which shows the timetable preparation steps, along with the deadlines. However, there are no written procedures for the first step of the process—the Corporate Decision. The Corporate Decision is the date when all decisions and data are provided by the Maintenance of Equipment, Engineering, Transportation, and Communications departments.

There was also limited documentation of how parameters (infrastructure, ridership data, available equipment, track outages, and information from the Corporate Decision) were used to create General Orders. With regard to the preparation of the General Orders, there are no written procedures that give step-by-step instructions on how they are developed. LIRR officials provided us with the *Service Planning Department Standard Operating Procedures—Equipment Section* and the *MTA LIRR Service Guidelines* (Service Guidelines), which focus on service frequency based on the number of customers at a station. The Service Guidelines should be updated every 5 years; however, they have not been updated since April 2015.

Officials stated that they hire experienced LIRR employees who have institutional knowledge of the system and Service Planning department officials train these employees.

We note, however, that written procedures and documentation provide employees with information about management’s objectives and that policies and procedures also serve as a reference/guide for staff when questions or issues arise regarding Service Planning processes. In the absence of documented policies and procedures, staff may not have all the information necessary to prepare or update General Orders.

LIRR officials also told us the Service Guidelines were not updated every 5 years as required because this is a multi-department collaboration, coordinated by a group that is now part of MTA Construction & Development. Furthermore, due to MTA’s Transformation (a plan to create efficiencies within MTA and reduce redundancy) and the COVID-19 pandemic, the update of the Service Guidelines was not prioritized, and officials stated that they are in the process of developing procedures for the Service Planning process.

Recommendations

6. Document the practices used by Service Planning to prepare the timetables to establish policies and procedures.
7. Document the final decision, feedback, and any other information that is due by the Corporate Decision date.
8. Update the Service Guidelines as planned and include new constraints to be considered.

Implementation and Interim Adjustments

As noted, Service Planning is responsible for scheduling train service, creating service timetables, and publishing branch schedules. In preparing its timetables, Service Planning officials told us they use available equipment and crew, scheduled track work and infrastructure, union guidelines, and customer feedback. Service Planning also uses ridership data in its planning.

To determine whether LIRR used these parameters to design its timetable to address passenger needs, we selected a judgmental sample of five LIRR branches—Babylon, Long Beach, Port Jefferson, Port Washington, and Ronkonkoma—and reviewed the service levels and conducted tests comparing the periods before and after the implementation of GCM services for 1-hour time periods, as noted in Table 1.

Table 1 – Hours Compared Before and After GCM Service Start

Peak		
	From	To
Arriving at Western Terminal	7:40 a.m.	8:40 a.m.
Leaving Western Terminal	5:20 p.m.	6:20 p.m.
Reverse Peak		
	From	To
Arriving at Eastern Terminal	7:40 a.m.	8:40 a.m.
Leaving Eastern Terminal	5:20 p.m.	6:20 p.m.

The new timetable schedules had several impacts on commuters, including changes in departure and destination stations and departure and destination times, the option of a “one seat ride” (ride without a transfer), and reduced train consist (a set of train cars that make up a train, i.e., passenger rail cars). Departure destination and departure time changes may

result in riders having to change their travel times, and when one seat rides are not available, passengers may have to transfer trains, increasing travel times and the risk of missing connections. Shorter train consists can also cause customers to experience crowding on platforms and on the trains.

Overall, the design of the new timetable did not always address passenger needs. For General Order #202 (September 5, 2023 to November 12, 2023), Service Planning returned two flyers to GCM (flyers do not stop at Jamaica station) and one direct service train to Brooklyn. There was not always adherence to the 60:40 ratio. Service frequency did not meet the level of service required during General Orders #101, #102, #201, and #202. Additionally, the percentage of riders to vehicle capacity for 28 of the 164 AM Peak trains was above the 90% threshold. Service Planning adjusted the number of cars or added trains for four of the 28 to remedy the situation. However, where vehicle capacity was low (below 70%), there was no documentation of steps taken to change the number of cars.

Consultant's Analysis of Weekday Customer Flows (60:40 Ratio)

According to an analysis provided by LIRR officials, the busiest time for LIRR is during the AM Peak (weekdays from 6–10 a.m.). During the AM Peak, 60% of Manhattan-bound customers prefer to go to Penn Station, while the remaining 40% prefer GCM.

We found that ridership did not always meet the desired 60:40 ratio between Penn Station and GCM—for both the initial timetable and updated timetables, as shown in Table 2.

Table 2 – Ratio of Train Service to Penn Station and GCM for Five Branches

2023 Schedule Period	Branch				
	Babylon	Long Beach	Port Jefferson	Port Washington	Ronkonkoma
Feb 27–May 21	76:24	77:23	60:40	82:18	66:34
May 22–Sep 4	73:27	74:26	59:41	79:21	65:35
Sep 5–Nov 12	66:34	66:35	61:39	79:21	64:36

In addition, we found that LIRR officials do not document the reason that trains were not scheduled according to the 60:40 ratio.

LIRR officials explained that they try to schedule trains to align as closely as possible with the ratio and that these variations were based on ridership, customer feedback, and track and yard capacity. They further stated that the ratio is not a policy, procedure, or practice but rather a guide used to schedule service.

Percentage of Riders to Vehicle Capacity

It is LIRR's practice to maintain the percentage of riders to vehicle capacity at 80%. Officials begin monitoring this percentage at 85% to ensure that ridership remains below 90% capacity. If this number goes to 90% or above, officials may add cars to the train or schedule an additional train where possible. If, however, it falls below 70%, they may adjust the number of cars.

In General Order #102 (February 27, 2023–May 21, 2023), ridership to vehicle capacity for 27 of 166 (16%) trains we reviewed during the AM Peak hour West of Jamaica was over 90%. In General Order #201 (May 22, 2023–September 4, 2023), 23 of 164 (14%) AM Peak trains were over 90%. Overall, the AM Peak ridership from each of the five sampled branches during the 1-hour time frame increased from General Order #201 to General Order #202 (September 5–November 12, 2023) when 28 of 164 (17%) trains' capacity was over 90%. Although LIRR officials added cars to lower the ridership to vehicle capacity percentage for four of these trains, it remained at 90% or more, and we saw no further action taken to either add cars or another train.

We also found one train below 70% throughout three General Orders (#102, #201, #202). The number of cars was reduced from General Order #102 to #201 but not reduced further from General Order #201 to #202 despite ridership still below 70%. This eight-car train had the capacity to transport 848 riders in both General Orders #102 and #202. However, it transported an average of 352 riders (42% of maximum capacity). We note that a six-car train has the capacity to transport up to 445 riders at 70% capacity and 509 riders at 80% capacity. Additionally, there was no documentation of steps taken to change the number of cars on these trains and use them on other train consists that required additional cars.

Service Frequency

LIRR Service Guidelines document Station Levels of Service, a measure of the number of customers who utilize a particular station each weekday. LIRR uses the levels of service to allocate resources such as schedule frequency. There are five levels. For example, Level 1 stations have more than 6,000 customers a day (e.g., Babylon and Hicksville), and the maximum headway (time between trains) on a weekday peak is 20 minutes. LIRR officials stated that when determining service frequency, they also consider the availability of equipment, track capacity, and operating resources.

We found that service frequency requirements (time between trains) were not always met during General Orders #101, #102, #201, and #202 (see Table 3 and Exhibit C).

Table 3 – Service Frequency Requirements Not Met

General Order #	Schedule Period	Higher Than Guidelines	Total Trains	Percentage
101	Pre-GCM	121	534	23%
102	GCM	70	683	10%
201	May 22–Sep 4, 2023	63	687	9%
202	Sep 5–Nov 12, 2023	63	662	10%

LIRR officials stated that they tried to fix service gaps and frequency issues. Service gaps that were not addressed were usually due to infrastructure constraints that made it impossible to add another train (e.g., single track, yard capacity) and federally mandated operating rules.

When service frequency is not met, there may be longer wait times that could impact other parts of the trip.

Origin and Destination Stations

In implementing GCM on February 27, 2023, LIRR changed the departure and destination stations and departure times. For example, prior to GCM, a Penn Station-bound train

(Train #31) left Babylon at 6:39 a.m. GCM implementation eliminated the 6:39 offering. Within our sampled 1-hour time period, the next available train from Babylon to Penn Station without a transfer (one-seat ride) was 20 minutes later, at 6:59 a.m. (Train #127). In addition, the Wantagh and Freeport stations were added as departure stations within the sampled hour, replacing the Amityville and Merrick stations on the Babylon branch. Further, service to Atlantic Terminal was reduced or eliminated. All trains (regardless of destination) were expected to stop at Jamaica station with the implementation of GCM. On our sampled branches, we observed that service to Atlantic Terminal was reduced from the Babylon branch and eliminated from the Long Beach, Port Jefferson, and Ronkonkoma branches.

As of the September 5, 2023 timetable, LIRR changed departure-destination pairs to reinstate one direct service train to Brooklyn from Port Jefferson (Huntington) and added three flyers to GCM. The addition of flyer service affected four of the five sampled branches (Babylon, Long Beach, Port Jefferson, and Ronkonkoma) in our sample.

- Ronkonkoma Train #2017 was changed to a flyer to GCM. As a result, the Forest Hills and Kew Gardens stops were removed. There is no service from the two stations to GCM in the Ronkonkoma branch schedule during the AM Peak. Furthermore, there is no service from Ronkonkoma to Forest Hills for the rest of the rush hour.
- The destination for Babylon Train #1233 that originated from Freeport was changed from Atlantic Terminal to GCM as a flyer. This eliminated direct service to Atlantic Terminal from the Babylon branch. Additionally, we note that there is no direct service to Atlantic Terminal, as Train #1241 was removed from the timetable in General Order #202.
- The Port Jefferson Train #2601 departure-destination pair was changed from Mineola–GCM to Westbury–Atlantic Terminal. This change reinstated direct service to Atlantic Terminal from the Port Jefferson branch. In addition, with General Order #202, LIRR officials also removed one train (#509) from the Port Jefferson branch, which left Mineola at 7:37 a.m. and arrived at Hunterspoint at 8:11 a.m. As a result, commuters at Mineola can take Train #37 at 7:15 a.m. (22 minutes earlier) that will get to Hunterspoint 24 minutes earlier, at 7:47 a.m.
- The Long Beach station, prior to GCM, had three westbound trains during the 1-hour peak period reviewed. Afterwards, the departure time for one train was changed from 7:39 a.m. to 8:02 a.m. (23 minutes)—a material change for riders.

We also noted that flyers were added to GCM but not to Penn Station during the 1-hour time frame. This means that passengers do not need to change trains.

LIRR pledges to customers that its top priority is to provide transportation that gets customers to their destination safely, comfortably, and on time. While MTA stated it takes passenger concerns into account when making changes, the scheduling changes described above may not support customer needs, as some passengers may have been required to change their travel times, potentially increasing wait times and adding more steps to their trips.

Recommendation

9. Use all available parameters when designing the timetable to better meet the customer demand.

Audit Scope, Objectives, and Methodology

The objectives of our audit were to determine whether LIRR implemented train service to GCM terminal in a manner that addressed customer needs. We also determined whether LIRR addressed passenger concerns in General Order #202 effective September 5, 2023. The audit covered the period from January 2021 through November 2023.

To accomplish our objectives and assess related internal controls, we reviewed LIRR's documented policies, procedures, and guidelines. We interviewed agency officials to clarify undocumented practices and to determine the factors that affect the service-planning process. We reviewed customer surveys, customer feedback, planning timelines, ridership, changes to infrastructure, and service changes. We observed the flow of customers in stations and determined the reliability of the schedule versus actual times of arrival/departure of trains. We also reviewed all 710 pieces of customer feedback from the five branches selected for our audit work.

We used a non-statistical sampling approach to provide conclusions on our audit objectives and to test internal controls and compliance. We selected both random and judgmental samples. However, because we used a non-statistical sampling approach for our tests, we cannot project the results of our random samples to the respective populations. Our samples, which are discussed in detail in the body of our report, include:

- A judgmental sample of five of LIRR's 11 branches selected based on service level, service area size, and number of trains to test for the impact of the addition of GCM, number of trains and cars provided for each terminal, loss of access (express trains), or additional stops affecting travel time (see Table 3).
- A judgmental sample of 247 of 6,702 unique customer feedback cases received between January 2022 and August 2023 by the five branches in our sample based on the nature and size of the case category and line/route.
- A random sample of 100 survey questionnaire responses from a total of 10,191 questionnaires.
- A judgmental sample of all timetables for the five branches selected based on direction and time of day to determine whether they met the Service Guidelines' requirements for the AM Peak period from 5 a.m. to 8:30 a.m.

We obtained data from systems used by Service Planning and Communications and assessed the reliability of that data by reviewing existing information, interviewing officials knowledgeable about the system, and tracing to and from source data. We determined that the data from these systems was sufficiently reliable for the purposes of this report. Certain other data in our report was used to provide background information. Data that we used for this purpose was obtained from the best available sources, which were identified in the report. Generally accepted government auditing standards do not require us to complete a data reliability assessment for data used for this purpose.

Statutory Requirements

Authority

This audit was performed 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 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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, including some duties on behalf of public authorities. For MTA, these include reporting MTA as a discrete component unit in the State's financial statements and approving selected contracts. These duties could be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our professional judgment, these duties do not affect our ability to conduct this independent audit of MTA's implementation of train service to GCM.

Reporting Requirements

We provided a draft copy of this report to MTA-LIRR officials for their review and formal comment. Their comments were considered in preparing this final report, and they are attached in their entirety at the end of the final report, except for Attachments A and C, which MTA classified as confidential.

In their response, MTA-LIRR officials acknowledged eight recommendations but will not act on them. They agreed to update the Service Guidelines in response to one recommendation. They will also create a documented agreement process among departments for the General Orders. This is a positive step, as the audit revealed insufficient documentation of departmental decisions on train services.

Within 180 days after the final release of this report, as required by Section 170 of the Executive Law, the Chairman and Chief Executive Officer of the Metropolitan Transportation Authority shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees advising what steps were taken to implement the recommendations contained herein, and where the recommendations were not implemented, the reasons why.

Major contributors to this report were Robert C. Mehrhoff, Anthony Belgrave, Adele Glasgow, Sean Liao, Anuradha Baldeo, Gisselle Ramirez-Toledo, Regina Ngan, and Andrea Majot.

We wish to thank the management and staff of the Metropolitan Transportation Authority's Long Island Rail Road for the courtesies and cooperation extended to our auditors during this audit.

Very truly yours,

Carmen Maldonado
Audit Director

cc: M. Murray, Metropolitan Transportation Authority
D. Jurgens, Metropolitan Transportation Authority

Exhibit A

Map of Grand Central Madison



Source: Metropolitan Transportation Authority–Long Island Railroad Grand Central Madison Company, July 26, 2023

Exhibit B

Post-GCM Service Increases

Number of Trains Scheduled				
Branch/Description	General Order #101 Pre-GCM	General Order #102 GCM	Number Increased	Percent
Port Washington*	90	103	13	14%
Oyster Bay	29	32	3	10%
Port Jefferson*	99	136	37	37%
Ronkonkoma*	77	118	41	53%
Hempstead	50	57	7	14%
City Term Zone – Penn-Jamaica	8	0	-8	0%
Far Rockaway	54	61	7	13%
West Hempstead	27	39	12	44%
Long Beach*	55	59	4	7%
Babylon*	125	155	30	24%
Montauk	51	58	7	14%
Subtotals	665	818	153	23%
Atlantic Terminal-Jamaica Shuttle	0	118	118	100%
Total Scheduled Trains	665	936	271	41%

*Sampled branches

Exhibit C

Service Frequency (Time Between Trains)

Implementation of Train Service to Grand Central Madison			
Schedule Period	Higher Than Guidelines	Total Train Intervals	Percent
Babylon Peak – AM			
Pre-GCM	20	178	11
GCM	5	220	2
May 22–Sep 4, 2023	5	215	2
Sep 5–Nov 12, 2023	5	210	2
Port Washington Peak – AM			
Pre-GCM	40	68	59
GCM	37	95	39
May 22–Sep 4, 2023	39	95	41
Sep 5–Nov 12, 2023	39	95	41
Port Jefferson Peak – AM			
Pre-GCM	33	151	22
GCM	8	203	4
May 22–Sep 4, 2023	7	201	3
Sep 5–Nov 12, 2023	7	193	4
Ronkonkoma Peak – AM			
Pre-GCM	24	79	30
GCM	17	92	18
May 22–Sep 4, 2023	10	103	10
Sep 5–Nov 12, 2023	10	93	11
Long Beach Peak – AM			
Pre-GCM	4	58	7
GCM	3	73	4
May 22–Sep 4, 2023	2	73	3
Sep 5–Nov 12, 2023	2	71	3
Totals			
Pre-GCM	121	534	23
GCM	70	683	10
May 22–Sep 4, 2023	63	687	9
Sep 5–Nov 12, 2023	63	662	10

Exhibit D

Public Information Sessions

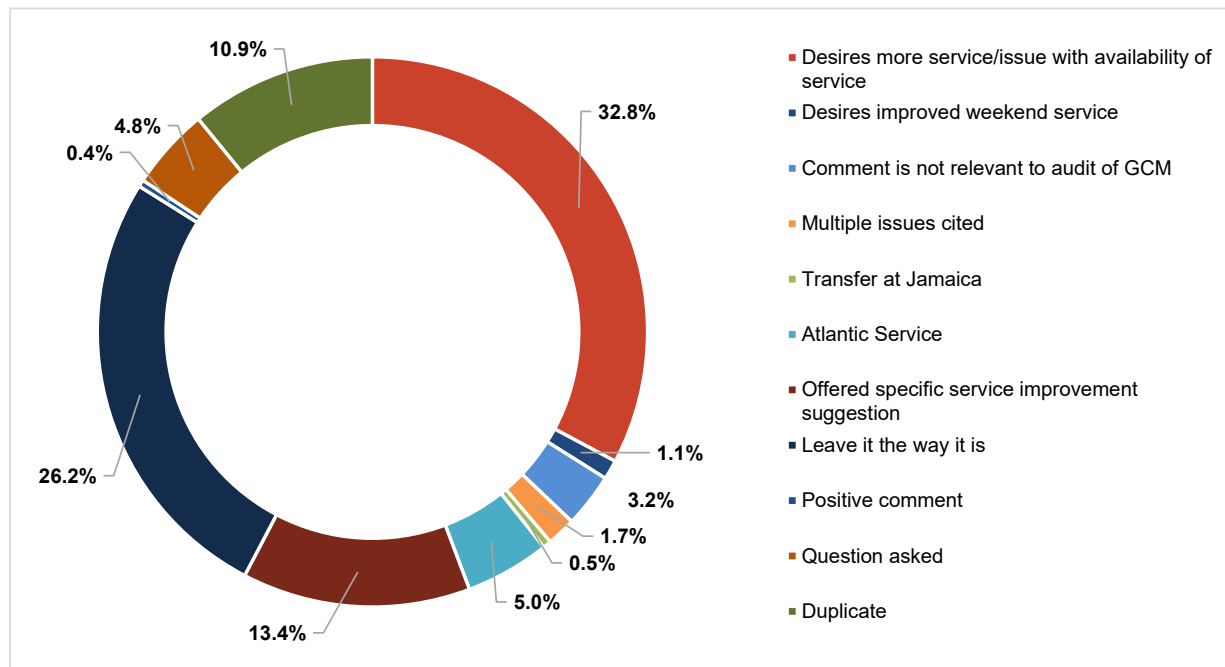
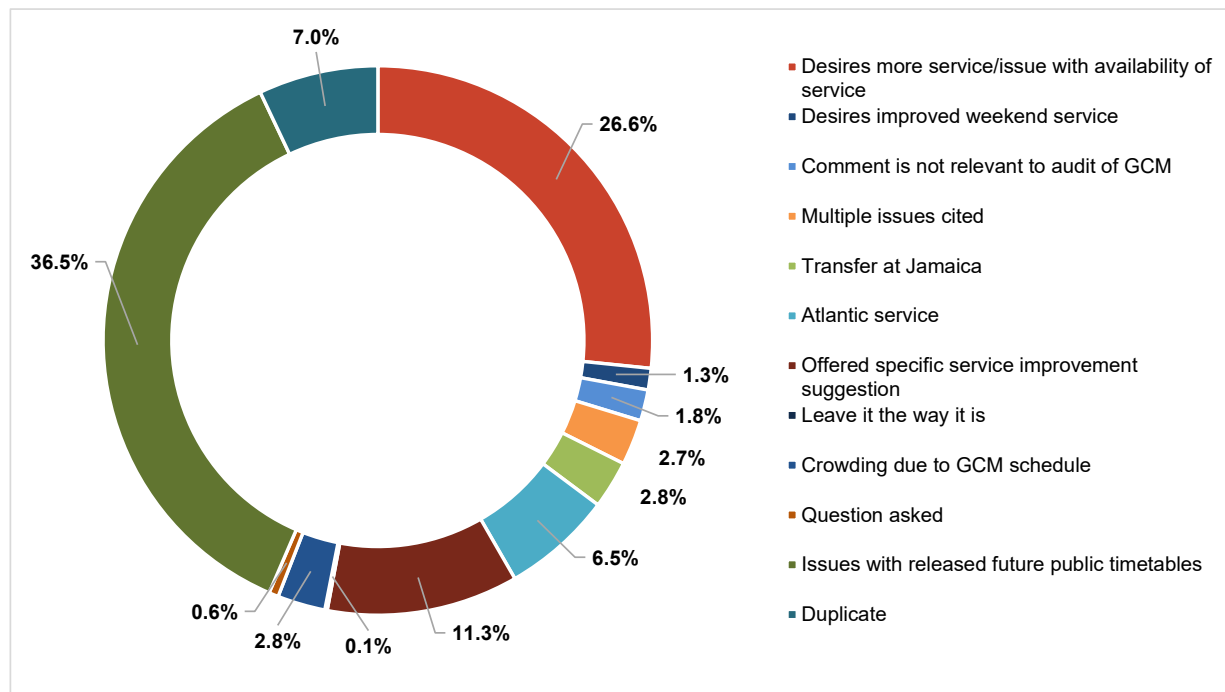


Exhibit E

Customer Feedback



Agency Comments and State Comptroller's Comments

2 Broadway
New York, NY 10004
212 878-7000 Tel

Janno Lieber
Chairman and Chief Executive Officer



Metropolitan Transportation Authority

State of New York

April 14, 2025

VIA E-MAIL

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: Draft Report #2023-S-28 (Implementation of Train Service to Grand Central Madison)

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 Robert Free, President, LIRR.

Sincerely,

A handwritten signature in blue ink, appearing to read "Janno Lieber".

Janno Lieber

c: Laura Wiles, MTA Chief of Staff
Monica Murray, Auditor General, MTA Audit Services

The agencies of the MTA

MTA New York City Transit
MTA Long Island Rail Road

MTA Metro-North Railroad
MTA Bridges and Tunnels

MTA Construction & Development
MTA Bus Company



April 14, 2025

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

**RE: New York State Comptroller's Request for Response
Implementation of Grand Central Madison Service 2023-S-28**

Dear Chair Lieber,

This letter is in response to the Office of the New York State Comptroller (OSC) report issued on March 7th, 2025, on the Implementation of Grand Central Madison (GCM) Service. This audit covered the period from January 2021 through November 2023. The focus of the audit was to determine whether Long Island Rail Road (LIRR):

- implemented train service to GCM terminal in a manner that addressed customer needs and;
- addressed passenger concerns in General Order 202, effective September 5, 2023.

On February 27, 2023, LIRR began historic full revenue service into GCM with a 41% service increase, providing commuters more flexibility, shorter commute times, connectivity, and resiliency when traveling to different parts of the city. For the first time in over a century a new Manhattan terminal for LIRR was introduced, requiring a complete overhaul of our schedules. Schedules were designed using data analytics, including origin and destination studies. The results of these studies indicated a 60/40 split between Penn Station and GCM, and as of the writing of this report, the 60/40 split has been achieved. LIRR continues to work diligently and methodically to improve the performance and customer experience with the new service, the proof of which can be seen in the consistently strong customer satisfaction at LIRR since the opening on GCM.

- Overall LIRR customer satisfaction as of Fall 2024 increased to 76% (up from 70% in Spring 2024), the highest it has been since the opening of GCM.
- Overall satisfaction for customers whose trip involves a transfer at Jamaica, where the majority of transfers occur, increased to 63% (up 8 points), partially reflecting recent success improving On-Time Performance (OTP) overall and into Jamaica, the main transfer hub.
- GCM received a 95% satisfaction rating in our latest customer satisfaction survey.

- The 2024 year-to-date OTP was at 95.6%, above the goal of 94%, the highest in recorded history outside of Covid.

State Comptroller's Comment – The objective of this audit was to determine whether MTA-LIRR implemented GCM service in a manner that addressed customers' needs. As part of its GCM service, LIRR changed how Atlantic Terminal Service was delivered by stopping direct service trains to the Atlantic Terminal and instead offering shuttles, which enabled riders to transfer in Jamaica to the Atlantic Terminal. While LIRR replied that there was "strong customer satisfaction" as reflected in the increased rating for riders that transfer at Jamaica, an 8% increase to 63% is not indicative of a strong customer satisfaction, as 37% of riders remained unsatisfied. Moreover, the 41% service increase does not mention that 118 of the 271 trains were shuttles from Jamaica to Atlantic Terminal and not increases in service to the branches.

Below please find detailed responses to the specific findings and recommendations.

With regard to this report, LIRR will take two (2) specific actions as follows:

- Establish a documented concurrence process amongst departments for information contained in General Orders.
- Update the Service Guidelines.

State Comptroller's Comment – We are pleased that MTA-LIRR officials indicate they will take action to improve documentation of certain decisions regarding train service. However, we note that they are taking no action on eight recommendations—choosing instead to "acknowledge" those recommendations.

As discussed below, the other recommendations described in the report do not require taking any additional actions, outside of those already completed or underway activities.

The report contains several statements that are or could be perceived in a way that is inaccurate. In addition to attempting to clarify these points before the draft report was issued, we have provided clarifications at the end of our response.

Recommendation No. 1

Process and close out customer feedback cases within the expected time frame.

Implementation Status:

The MTA acknowledges this recommendation, but no new action will be taken. In response to the initiation of new service to GCM, several public sessions were held to review and address customer feedback, which was concluded within the expected timeframe.

Page 4, 3rd paragraph under Customer Engagement, states "We found that 45 of the 247 cases were not closed up to 78 days after the 14-day timeframe requirement." It should be noted that 38 of the 45 cases identified as overdue (84.4%), were not relevant to GCM service - See

Attachment C. These included issues predating its implementation or unrelated matters such as announcement voice quality, elevator outages, fare discrepancies, and parking at Huntington Station. Moreover, the closure rates of the 247 cases sampled were not representative of the department's overall case closure rate for 2023.

State Comptroller's Comment – The report did not indicate that these cases related to GCM but rather that MTA was not timely in responding to customer service complaints in the sample provided—which was for a specific time period. The data MTA cites not only are for a different time period than the sample but also are for a different process—which apparently changed during the sample period. Moreover, even if this was not the case, MTA officials did not provide the data they cite in their response and therefore we did not have the ability to assess its accuracy.

The MTA systems underwent a migration to a new platform in June 2022. For calendar year 2023, the first full year of utilization of the new system, the LIRR closed a total of more than 17,400 cases, with an average case closure rate of six (6) days, and a median case closure rate of three (3) days. Nearly 93% of cases closed within 14 calendar days which was within the established Service Level Agreement (SLA) while managing a substantially higher volume of cases compared to 2022 (17,441 versus 9,486, representing an 83% increase). In 2024, adherence to SLA increased to 98%, accompanied by a 16% increase in volume compared to 2022 (10,968 vs. 9,486), with an average case closure rate of three (3) days and a median case closure rate of one (1) day.

Recommendation No.2

Develop a formal mechanism for documenting the receipt and assessment of comments from the public regarding proposed train schedules or other service-planning issues.

Implementation Status:

The LIRR and MTA acknowledge this recommendation, but no new action will be taken. Over the years, the MTA has made remarkable strides in improving its customer feedback tools, harnessing the power of new technology to collect real-time feedback data and gain invaluable insights that can be shared with relevant departments. At the MTA, we understand the importance of customer feedback in shaping our operations and making informed decisions. By investing in the necessary upgrades and resources, we have established a more robust and efficient system that enables us to effectively address public concerns and enhance the overall commuter experience.

Since 2022, the MTA has invested over \$22.M in the latest technology to improve the customer experience system. This includes \$14M for our Customer Relationship Management System (CRM) platform, and over \$8M for our Contact Center as a Service System (CCaaS). As a result, we improved the overall customer experience, including shortening and strengthening the customer feedback loop, expanding our ability to respond to customers through multiple input channels, and enhancing self-service opportunities. With respect to the receipt of comments from the public, there is a formal mechanism in place that documents their receipt. Comments submitted through our general online feedback form receive a case number and are logged in

our CRM platform. Similarly, cases submitted during a public hearing process are also incorporated into the system, via a custom form pertinent to the hearing. With respect to the assessment of scheduling/service planning feedback conveyed via the online feedback form, Customer Engagement staff typically share that feedback with Service Planning via email, in some instances as information only as a response is not required, and in other instances seeking a response back as to the feasibility of implementing the suggestion. In addition, customer feedback is regularly transmitted to Service Planning in aggregate using the reporting tools available in the CRM so that Service Planning can see which trains and/or branches are receiving the greatest share of feedback. It is not necessarily useful to document responses on a case-by-case basis as many of the schedule changes made were broad-based that addressed a multitude of customer concerns (for example, increasing the frequency of Brooklyn shuttle service in the initial weeks after the rollout of the timetable.)

State Comptroller's Comment – MTA's response only addresses part of the recommendation. While MTA has invested in new technology that documents the receipt of comments from the public hearing and pre-GCM service, it does not address why such a system is unable to provide information on how MTA responded to these comments—even in aggregate. This is something that should be relatively simple using the latest technology.

Recommendation No. 3

Document actions taken to revise or adjust service and/or the decision not to take action in response to customer feedback.

Implementation Status:

The LIRR and MTA acknowledge this recommendation, but no new action will be taken. The MTA highly values feedback received from its customers. It is important to note that actions taken to adjust service are not solely based on customer feedback. Customer feedback is a valuable input and is just one of the many other critical factors considered in the decision-making process. Feedback is reviewed holistically, considering various factors to ensure the best possible service for passengers given potential infrastructure and equipment availability.

State Comptroller's Comment – Even if feedback is considered holistically, how it is used in decision-making should be documented. As stated in Standards for Internal Control for New York State, "Documentation is crucial for showing decision-making as it preserves evidence to substantiate decisions, events, transactions, or systems. It provides a clear organizational history that can justify subsequent actions and decisions, aiding in self-evaluations and audits."

Other input includes passenger demand, operational feasibility, resource availability, safety, and system efficiency. This comprehensive evaluation ensures that changes made are well-considered and aligned with the best interests of the entire system. These factors are instrumental in ensuring safe and reliable service. As such, documenting and listing the specific changes made based on feedback can be challenging as there are numerous contributing factors that would have to be carefully weighed. This recommendation seeks to impose additional

bureaucratic processes with no clear benefit, and this would be inconsistent with the MTA – and the Comptroller’s – push in favor of increased efficiency and cost savings.

State Comptroller's Comment – Contrary to MTA's position, documentation helps both save costs and makes an organization efficient with the added benefit of improved transparency. Documentation not only supports organizational efficiency but informed decision-making and accountability. According to the Standards for Internal Control for New York State, documentation establishes expectations and defines how tasks should be performed, reducing confusion and ensuring employees understand their responsibilities; ensures uniformity in decision-making and operations, minimizing errors and conflicts; serves as a reference for evaluating employee performance and adherence to organizational standards; helps identify and address risks, ensuring compliance with laws, regulations, and organizational goals; and provides new employees with a clear understanding of organizational practices, facilitating smoother integration.

Customer Engagement and Service Planning have a longstanding collegial, productive, and successful relationship with respect to addressing customer feedback on scheduling/service issues. Service Planning recognizes Customer Engagement's role in advocating for the customer, and Customer Engagement recognizes the infrastructure, equipment, personnel, and other logistical issues that may preclude the implementation of a given customer suggestion. Contrary to the following statement, "...some passengers may have been required to change their travel time..." (Page 3, 2nd Paragraph under Results of Audit), the recent service adjustments involved schedule changes affecting every LIRR branch and impacting all customers. LIRR serves five (5) western terminals, where the option to transfer was always available to our customers. Part of the September 2024 timetable provided for less customer transfers in addition to more direct service to Atlantic Terminal. Our objective is to provide comprehensive service to all our riders, not just a select group.

Recommendation No. 4

Revisit the process to identify those that are essential to the service planning decisions and document all essential decisions to ensure the efficiency of future decision-making.

Implementation Status:

The LIRR acknowledges this recommendation, but no new action will be taken. Each department's role within this process is clearly identified, allowing for effective communication and collaboration. The essential departments involved in this process are Engineering and Capital Program Delivery & Oversight. These departments are responsible for coordinating the track and/or station activities. Following a thorough discussion among all concerned parties, and once consensus is reached on the requested track outages, Service Planning marks up the General order to allocate track time for the agreed-upon activities. This track time, as reflected in the General Order, is then documented on the Final Draft General Order Summary page as shown in *Attachment A*. In addition, feedback is required from other departments such as Maintenance of Equipment and Transportation to determine equipment and manpower

availability. Additional processes to identify those that are essential to Service Planning decisions can also be found in the Track Outage Plan (TOP) which ensures that relevant departments collaborate and agree on the necessary Service Planning decisions and is reviewed and agreed upon annually.

State Comptroller's Comment – The essential departments identified during our audit were provided by Service Planning officials. While Engineering was one of the four departments, Capital Program Delivery & Oversight was not. Moreover, while MTA references Attachment A as evidence that it documents factors in service-planning decisions, we would disagree. Unfortunately, as MTA has deemed Attachment A confidential, we cannot publicly post it.

It is crucial to address the statement in the draft report that "...it is not their practice to document service-planning decisions." as stated in the 1st paragraph on page 5, as it is factually incorrect. Service planning decisions are documented through various means to ensure future efficient decision-making. These documents include General Notice changes, General Orders, Crew Book revisions, and Equipment Manipulation revisions; all of which have been previously provided to the Auditors as evidence of our commitment to documenting service planning decisions. The LIRR produces a document known as the Staff Summary – please see *Attachment B*, which provides information for the Long Island Committee. Timetable changes are noted, as are service improvements and various construction activities. This document is signed by the Senior Vice President-Operations and Chief Transportation Officer. Nevertheless, to further enhance documentation, the LIRR will establish a documented concurrence process amongst departments for information contained in General Orders. More specifically, documented concurrence from Service Planning, Engineering, and Capital Program Delivery & Oversight departments will be required.

State Comptroller's Comment – Our report states that Service Planning uses Crew Book revisions and Equipment Manipulations. However, without documenting how they are used, what was provided is insufficient to determine how the decision was made and the justification for the decision.

Recommendation No. 5

Communicate service improvements in more details to provide customers with more relevant information such as types of service and branches affected.

Implementation Status:

The LIRR acknowledges this recommendation and is taking an alternative course of action. Information regarding planned service changes is disseminated to the public through accessible online platforms. Customers can consult mta.info/alerts for current and upcoming planned service changes on the LIRR that may impact their journeys. Furthermore, the TrainTime application provides real-time arrival and status updates, including incident notifications relevant to a user's selected branch or line. Revised travel plans can be made via mta.info/schedules. Customers are also offered the opportunity to subscribe to real-time service alerts, planned service change notifications, and MTA newsletters. Service changes as a result

of GCM were communicated to customers via an information page (<https://www.mta.info/grandcentralmadison>).

State Comptroller's Comment – LIRR needs to revisit whether it is doing enough to reach its customers. The alternative course of action it suggests requires its customers access the information electronically—which assumes that all of its customers can get online reliably. In addition, as mentioned in the report, even if customers can access timetables electronically, the information is available only in English. Additionally, while the TrainTime app is available in six languages, it is available only to customers who can download and use the app.

Recommendation No. 6

Document the practices used by Service Planning to prepare the timetables to establish policies and procedures.

Implementation Status:

The LIRR acknowledges this recommendation, but no new action will be taken. We note that the statements in the draft Report that “absence of formal procedure or informal notes about Service Planning practices...new personnel joining Service Planning will not have processes documented.” (Page 5, 1st paragraph) and “there are no written procedures...” (Page 6, 2nd paragraph under Scheduling Process/General Orders) are inaccurate, as demonstrated by other language in the report. As the auditors acknowledged on Page 6, 2nd paragraph under Scheduling Process/General Orders, “LIRR officials gave us their Service Planning General Order Implementation Timeline, which shows the timetable preparation steps, along with the deadlines.” Reference sheets and guides serve as valuable resources for new personnel covering a wide range of procedures related to timetable preparation. Some of these procedures include the Workflow Timeline, TPSS Manual, Production, Train Numbering Scheme, Public Timetable, Travel Time Overview & Reference Guide, Parameters, MU Fleet Operations, Validation, Equipment Manipulations, and Yard Capacities. This documentation, which is privileged and confidential, has already been shared with OSC. Nevertheless, the LIRR will develop a general document noting necessary steps, as well as referencing manuals, reference guides etc... Further, to ensure the continuity of expertise and foster growth, Service Planning maintains a workforce with varying levels of institutional knowledge. Our strategy includes hiring experienced professionals alongside providing thorough on-the-job training for newer staff, facilitated by senior team members. Knowledge sharing and proactive succession planning are integral to this approach.

State Comptroller's Comment – The reference to the Timeline as a “wide range of procedures related to timetable preparation” is an overstatement. The document is a 1-page table with dates when documents are due to Service Planning with limited guidance. For example, there is no information as to what is done to arrive at the number of crews required for the train service, which would be important guidance to have.

Recommendation No. 7

Document the final decision, feedback, and any other information that is due by the Corporate Decision date.

Implementation Status:

The LIRR acknowledges this recommendation, but no new action will be taken. The Corporate Decision date is communicated to stakeholders via e-mail in advance of the corporate decision due date and feedback is incorporated into G.O. – please see *Attachment A*. Additionally, please see *Attachment B* as an example of feedback received by the Corporate Decision Date. For proposed Projects/trackwork within a particular timetable timeframe, reviews are conducted with stakeholders. The outcomes of these reviews are documented according to the Track Outage Planning (TOP) process. The TOP document was provided to the auditors on May 6th, 2024.

Recommendation No. 8

Update the Service Guidelines as planned, and include new constraints to be considered.

Implementation Status:

The LIRR and MTA agrees with this recommendation. It is important to note that the Service Guidelines utilized did not negatively impact the implementation of GCM schedule. Further, as stated in the Service Guidelines, language outlined “are not a guarantee of the level of service described and do not confer legal rights upon customers or others.” Nevertheless, the process of updating the Service Guidelines has resumed, and meetings have been conducted to begin the process.

Recommendation No. 9

Use all available parameters when designing the timetable to better meet the customer demand.

Implementation Status:

The LIRR acknowledges this recommendation, but no new action will be taken, since all available parameters are already used when designing timetables. Since the opening of GCM, and as part of LIRR's on-going process, data analysis is a crucial step to implement necessary changes to meet customer evolving demands. The LIRR has diligently carried out this task and continues to analyze data to adjust service, while also operating within its limitations.

OTHER CLARIFICATIONS

1. Page 2, 1st bullet in 4th paragraph states, “#101 - September 6, 2022 through February 26, 2023” is incorrect. #101 is from May 23, 2022 - February 26, 2023.

State Comptroller's Comment – We revised our report based on MTA-LIRR's response.

2. Page 3, 4th paragraph states, “Additionally, the percentage of riders to vehicle capacity increased, with 28 of the 164 AM Peak trains above the 90% threshold.” In response to trains experiencing seating capacity concerns, the LIRR conducted a daily analysis of ridership trends. Adjustments were then made to the consist sizes of specific trains, as deemed necessary.
3. Page 3, 2nd paragraph under Public Information Sessions states, “According to LIRR officials they adjusted General Order #102 (February 27, 2023 to May 21, 2023) to address the concerns of customers from the “most vocal branch,” Port Washington, which they stated were addressed in Revision 9 within General Order #102. However, no documentation was provided to show how the comments related to the other sampled branches, if they were addressed, or, if no action was taken, why.” This is incorrect, as indicated in the report on Page 5, 1st paragraph, “...service changes is captured in General Notice changes, General Orders, Crew Book revisions, and Equipment Manipulation revisions...”.

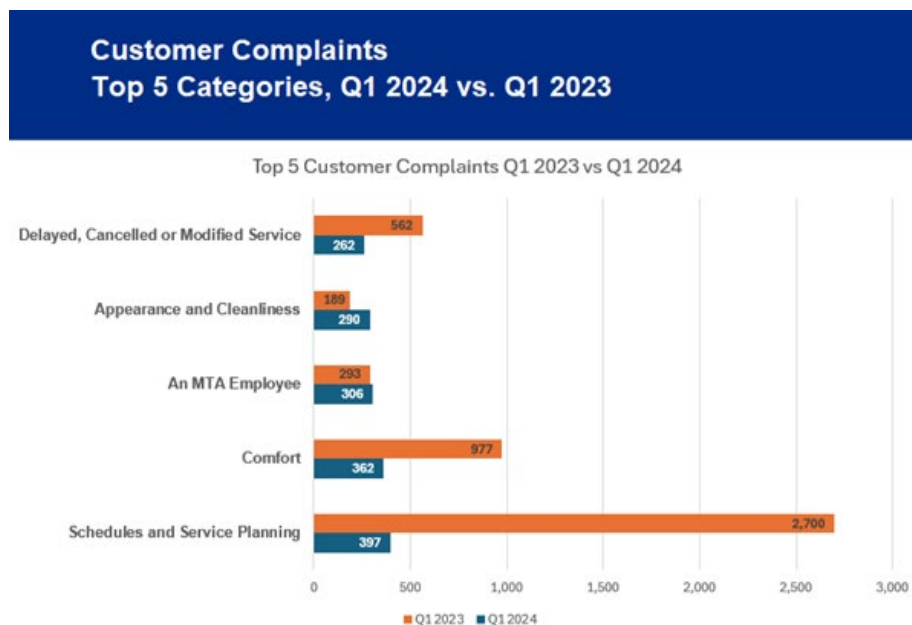
State Comptroller's Comment – LIRR did not provide information as to how the customer comments for the other sampled branches were addressed.

Notably, the Port Washington Branch had a 16% increase in overall satisfaction – up to 76% from November 2023 – thanks to increased customer engagement and scheduled adjustments made last fall.

4. Page 4, 4th paragraph under Customer Engagement states, “However, for one email that contained 207 customer comments from February 8, 2023 through February 13, 2023, no documentation was provided to show actions whether the feedback was reviewed or the action taken to address customer concerns.” It should be noted that the majority of the feedback received did not provide relevant or specific information, or simply expressed general disgruntlement with the upcoming changes, making it challenging to take any implementable actions. Nevertheless, after the distribution of the States first Preliminary Report on June 4, 2024 Service Planning prepared and provided the Auditors with a document addressing 83 out of the 207 pieces of feedback. However, the Auditors deemed the information provided insufficient and it was not accepted by the state.

State Comptroller's Comment – LIRR officials initially did not provide any documentation in response to the 207 pieces of customer feedback for the period from February 8, 2023 through February 13, 2023. When the lack of documentation was raised by the auditors, MTA then provided a document with responses to 83 comments with no support as to where it derived that information from and when it was created and thus was insufficient.

5. Page 4, 5th paragraph under Customer Engagement states, “...we reviewed all 710 pieces of feedback from customers on the five sampled branches, it showed that the top common customer concerns... desire for more service/issues with availability of service, specific service improvement suggestions, and Atlantic service concerns.” The LIRR has made changes in response to customer feedback regarding the implementation of GCM Service. However, it is important to note that while customer comments are considered, they are not the sole factor taken into consideration when making service planning changes. We have seen a significant decrease of approximately 85% in customer complaints related to Schedules and Service Planning in Q1 2024 compared to Q1 2023.



6. Page 5, 2nd paragraph states, “In the absence of clear requirements and direction, there are factors of service planning that may not be consistently applied.” We have requested clarification regarding this statement. In response to our inquiry, OSC stated, “You will find that information in the condition where we explained the process.” Since further clarity was not provided, we interpreted “factors” to refer to a document called Service Guidelines – see response to Recommendation No. 8.
7. Page 5, 1st paragraph under Train Service states, “However, we found that only 153 of the 271 trains were for branch service, representing only a 23% increase in service. The remaining 118 trains were for Brooklyn shuttle service from Atlantic Terminal to Jamaica Station.” This statement by OSC is incorrect.

State Comptroller's Comment – We used the documents LIRR Service Planning provided to support the increased service reported. LIRR did not provide any additional documents to support the new numbers.

The actual number of trains to/from Atlantic Terminal was 155, consisting of 119 Jamaica shuttle trains and 36 through trains. Moreover, OSC's analysis fails to recognize the Jamaica shuttle should be considered part of the overall service increase.

State Comptroller's Comment – The Jamaica shuttle trains do not provide additional service to the LIRR branches. Moreover, this was not evident in the announcement of a 41% increase in service.

8. Page 6, 2nd paragraph states, “The Corporate Decision is the date when all decisions and data are provided by the Maintenance of Equipment, Engineering, Transportation, and Communication, departments.”. It has been repeatedly noted to OSC that the department designated as 'Communication' by OSC is not an official MTA or LIRR department. Additionally, the departments involved do not include Maintenance of Equipment or Transportation. However, the Construction and Development department, along with the track work, plays a significant role in the development of a General Order.
9. Page 6, 3rd paragraph states, “There was also limited documentation of how parameters (infrastructure, ridership data, available equipment, track outages, and information from Corporate Decision) were used to create General Orders.” This is incorrect, equipment requirements are documented in the General Order Cycle Pages, Track Outages/infrastructure are located on the First Draft and Final Draft Summary pages, and historical and projected published ridership data.

State Comptroller's Comment – We maintain our position that the documentation LIRR Service Planning provided was limited as to how the parameters were used.

10. Page 7, 3rd paragraph states, “The new timetable schedules had several impacts on commuters, including changes in departure and destination stations and departure and destination times, the option of a “one seat ride” (ride without a transfer), and reduced train consist (a set of train cars that make up a train, i.e., passenger rail cars)...Shorter trains consists can also cause customers to experience crowding on platforms and on the trains.” With the implementation of GCM Service, the schedules underwent a complete re-write. Therefore, it is important not to compare the pre-GCM schedules with the post-GCM schedules on a station and departure time basis, as the schedules are significantly different. The service guidelines do not differentiate or guarantee a one-seat ride to the customer's final destination. Consist sizes were adjusted after GCM opened based on ridership levels and customer feedback. With improved service levels, it is not necessarily the case that shorter consist results in overcrowded trains and platforms.
11. Page 7, 4th paragraph states, “Service frequency did not meet the level of service...”. Service frequency was not always met due to federally mandated operating rules (i.e. PTC) and infrastructure constraints.
12. Page 7, 2nd paragraph under Consultant's Analysis of Weekday Customer Flows (60:40 ratio) states, “We found that ridership did not always meet the desired 60:40 ratio between Penn Station and GCM...” As indicated in the report, we try to schedule trains as close as possible to align with the 60/40 split, and variations were not solely based on ridership, but also take into account factors such as customer feedback, and track capacity.

13. Page 8, 1st table indicates, “Ratio of Train Service to Penn Station and GCM for Five Branches.” The fundamental principle of the 60/40 service split is its application as a systemwide guideline, not as a strict requirement for each individual branch or station. This guideline was strategically developed based on data from a geo-coded survey estimating that roughly 40% of customers would likely choose Grand Central if the service were available. We have repeatedly conveyed and explained this systemwide basis to the auditors; however, they continue to analyze service levels at the branch level. Service Planning firmly maintains that this branch-specific analysis is an incorrect interpretation of the guideline's intent. Operational factors such as slot availability, service intervals, and equipment constraints necessitate variations at the branch level. The split is designed for the entire system, acknowledging that some branches are inherently aligned with specific terminals, especially during Off-Peak and Weekend service (customers can still transfer at Jamaica). The initial service distribution following GCM's opening was a temporary adjustment to manage initial demand. Subsequently, service levels were adjusted systemwide, achieving the planned 60/40 split in March 2024.
14. Page 9, 1st paragraph states, “We found that service frequency requirements (time between trains) were not always met...”. It is important to note that the Service Guidelines are subject to deviation based on various factors such as track capacity, availability of operating personnel, and other operational resources. These resources include data from Customer Surveys, load-weight data, ticket sales data, as well as field observations of transfers in Jamaica and other stations. Additionally, customer feedback and input from elected officials representing their constituents are also taken into consideration. Given the LIRR's system of interconnected branches and multiple western terminals, even a single change to the schedule of one train can have a significant impact. This can lead to subsequent adjustments in schedules and potential equipment issues. As a result, any modifications made must be thoroughly evaluated to assess their potential ripple effects throughout the entire system. We analyze the impact and carefully consider if the change is beneficial for our customers and operationally feasible. It is essential to understand that some requests cannot be accommodated due to these complex considerations. While a change might benefit a specific individual, it could potentially have adverse effects on thousands of other customers.
15. Page 9, 1st paragraph under Origin and Destination Stations states, “For example, prior to GCM, a Penn Station-bound train (Train# 31) left Babylon at 6:39 am. GCM implementation eliminated the 6:39 offering. Within our sampled 1-hour time period, the next available train from Babylon to Penn Station without a transfer (on-seat ride) was 20 minutes later, at 6:59 am. (Train# 127). In addition, the Wantagh and Freeport Stations were added as departure stations...” Post GCM, customers can take the 6:31 AM (Train #125), which departs Babylon 8 minutes earlier and arrives at Penn Station 12 minutes earlier, saving 4 minutes per day on the morning commute. Alternatively, for an even faster commute, the customer could have taken the 6:48 am train out of Babylon, transferred at Jamaica for the Penn Station train, and arrived at 7:52 am, which is 6 minutes faster than the pre-GCM schedule. Regarding Wantagh and Freeport Stations, it's important to note that they were not simply added or replaced stops. Instead, the schedules were rewritten based on various factors such as ridership trends, studies, and new infrastructure. Specifically, this pertained to the Babylon Branch and

the Massapequa Pocket Track. The pocket track eliminated the crew and equipment turn on the main track which allows for efficient train movement.

16. Page 9, 1st paragraph under Origin and Destination Stations states, “Further, service to Atlantic Terminal was reduced or eliminated.” It should be clarified that direct service to Atlantic Terminal was not eliminated but rather reduced.

State Comptroller’s Comment – The timetables for General Order #101 and General Order #102 show that the direct service to Atlantic Terminal was eliminated on the Ronkonkoma, Port Jefferson, and Long Beach branches.

Platform F was constructed to facilitate the opening of GCM and accommodate additional throughput on other tracks in Jamaica Station. Although this reduced the availability of one-seat rides to Atlantic Terminal, it also led to a notable increase in service intervals to and from Atlantic Terminal. Before the opening of GCM, certain Atlantic Terminal-bound trains would bypass the East New York (ENY) station. Currently, shuttle train service ensures that all stations receive frequent train service.

17. Page 9, 1st bullet under Origin and Destination Stations states, “Ronkonkoma Train #2017 was changed to a flyer to GCM. As a result, the Forest Hills and Kew Gardens stops were removed. There is no service from the two stations to GCM in the Ronkonkoma branch schedule during the AM Peak. Furthermore, there is no service from Ronkonkoma to Forest Hills for the rest of the rush hour.” During the AM Peak hours, there was train service available to GCM that did not originate from Ronkonkoma. Customers wishing to travel from the Ronkonkoma Branch to Forest Hills have both direct opportunities, as well as the option to transfer at Jamaica from any train on the Ronkonkoma Branch. Stations west of Jamaica (Kew Gardens, Forest Hills, and Woodside) are not tied to any particular branch as they fall within the City Terminal Zone and are served by trains from various branches throughout the system.
18. Page 10, 1st bullet states, “As a result, commuters at Mineola can take Train #37 at 7:15 am (22 minutes earlier) that will get to Hunterspoint Ave 36 minutes earlier at 7:47 am.” This is incorrect, Train 37 arrives to Hunterspoint Ave 24 minutes earlier.

State Comptroller’s Comment – We revised our report based on MTA-LIRR’s response.

19. Page 10, 2nd bullet states, “The Long Beach station, prior to GCM, has three eastbound trains during the 1-hour peak period reviewed. Afterwards, the departure time for one train was changed from 7:39 am to 8:02 am (23 minutes) – a material change for riders.” Service Planning does not look at service in hourly snapshots and writes to service guidelines. The LIRR is within the Service Guidelines which suggests a 30-minute service interval as Long Beach is a level 2 station. Following the 7.24 AM train was a 7.54 AM train from Long Beach to GCM. When performing an analysis, the LIRR includes the entire AM and PM Peak periods.
20. Page 15, Exhibit C showcases significant discrepancies between the figures presented in the audit and our internal operational data.

State Comptroller’s Comment – The Exhibit C heading was changed to clarify that this measures intervals between trains—which is service frequency.

Mr. Janno Lieber
April 14, 2025
Page **14** of **14**

We lack the necessary information to understand the basis for these numbers or the calculation methods employed, and therefore cannot validate them. As an illustration, our records do not support the claim of 210 AM Peak trains on the Babylon Branch. If the figures represent total daily trains, the derivation is not evident. Moreover, the Service Guidelines' daypart-specific requirements for train service make an aggregate daily number an irrelevant and potentially misleading metric for assessing compliance.

Sincerely,



Robert Free
President
Long Island Rail Road

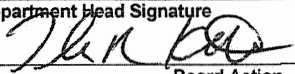
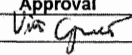

cc: Hector Garcia - LIRR
Tom Kost – LIRR
Charles McKiernan - LIRR
Jack Saunders -LIRR
George Fletcher - LIRR
John Walsh – LIRR
Anthony Kingren – LIRR

Shanifah Rieara - MTA
Chris Papandreou - MTA
Thomas Nespeco - MTA
Danielle Camirand - MTA
Johanna Rosado - MTA
Isabel Ramesar - MTA
Lamond Kears - MTA
Darren Jurgens – MTA Audit Services
Monica Murray – MTA Audit Services

Attachment B

Staff Summary



Subject MAY TIMETABLE CHANGE & TRACKWORK PROGRAMS						Date April 4, 2024			
Departments SR. VICE PRESIDENT – OPERATIONS						Vendor Name			
Department Head Names T. KOST (Acting)						Contract Number			
Department Head Signature 						Contract Manager Signature			
Board Action									
Order	To	Date	Approval	Info	Other	Internal Approval			
1	LI COMM	4/24/24				Order	Approval	Order	Approval
						2 Acting CTO		1	President 

PURPOSE:

This is to inform the Long Island Committee of the MTA Long Island Rail Road's plan to adjust schedules beginning May 20, 2024, through September 2, 2024.

Projects supported during this timetable include Grand Central Madison Contractor Maintenance and Wireless Cellular Installation, Hall Interlocking Expansion, Rail Replacement and Maintenance on the Atlantic Branch, Atlantic Tunnel Lighting, ADA Station Rehabilitation at Babylon, Hollis and Forest Hills Stations, West Side Yard Track Construction, and Valley Stream Station Rehabilitation.

Additionally, track work programs will support ADA Station Reconstruction on the Montauk Branch, Signal Construction and Maintenance between Jamaica and Queens Village, and the Van Wyck Bridge Widening Project.

MAY 20 TIMETABLE CHANGE

Service Improvements

- In response to changing customer travel patterns, one Montauk Branch train from Penn Station that normally operates on Fridays only will also operate on Thursdays for the summer.

Construction Activities

- **Montauk Branch, Babylon Station, ADA Station Rehabilitation** – One of three station tracks in Babylon will be out of service on midday/weekdays to support ADA station rehabilitation at Babylon Station.
 - **Temporary Service Adjustments:** With one of one of three station tracks out of service on middays, some Babylon Branch trains will terminate/originate at Massapequa, with connecting service available to Babylon. Additionally, schedule adjustments will be required on most Babylon/Montauk Branch trains during the midday period.
- **Hempstead Branch, Hollis Station, ADA Station Rehabilitation** – One of four main tracks will be out of service on weekday overnights between Jamaica and Queens Village to support ADA station rehabilitation at Hollis Station.

- **Temporary Service Adjustments:** With one of four main tracks out of service during the weekday overnight period, eastbound and westbound schedule adjustments will be required on the Hempstead, Ronkonkoma, Oyster Bay, and Port Jefferson Branches. Additionally, some westbound trains will not make stops at Elmont-UBS Arena. The ADA Station Rehabilitation project will not work during events at UBS Arena, and regular service intervals will be restored.
- **Atlantic Branch, Valley Stream Station Rehabilitation** – One of two station tracks at Valley Stream will be out of service on weekends to support station rehabilitation.
 - **Temporary Service Adjustments:** With one of two station tracks out of service on weekends, schedule adjustments will be required on the Long Beach and Far Rockaway Branches.

TRACK WORK PROGRAMS

Construction Activities (Short-term trackwork items requiring a special program)

- **Montauk Branch – ADA Station Rehabilitation – St. Albans** – On the weekends of May 4-5 and May 18-19, both main tracks on the Montauk Branch between Jamaica and Valley Stream will be out of service to support the ADA Accessibility Project at St. Albans.
 - **Temporary Service Adjustments:** With both main tracks out of service on the Montauk Branch between Jamaica and Valley Stream, bus service will replace train service to/from St. Albans for a period of 48-hours. Additionally, schedule adjustments will be required on the Babylon, Montauk, Long Beach, West Hempstead, and Far Rockaway Branches.
- **Main Line – Signal Maintenance & Construction** – On Saturday, May 11th, one of four main tracks between Queens Village and Jamaica will be out of service for approximately 30 hours to support signal maintenance and construction.
 - **Temporary Service Adjustments:** With one of four main tracks out of service between Jamaica and Queens Village, bus service will replace westbound train service at Hollis and Queens Village Stations. There will be no westbound service from Elmont-UBS Arena.
- **Van Wyck Bridge Widening Project** – On the weekend of May 18-19, select tracks in Jay Interlocking, which is located just west of Jamaica, will be temporarily taken out of service to support the Van Wyck Bridge Widening Project.
 - **Temporary Service Adjustments:** With limited infrastructure in Jamaica on the weekend of May 18-19, West Hempstead Branch trains will terminate/originate in Jamaica. Additionally, the Brooklyn Shuttle will be reduced from three trains an hour to two trains an hour for a period of 48-hours.

IMPACT ON FUNDING

Funding for these projects is contained in the Long Island Rail Road Operating and MTA Capital Program budget.