FRA’s Increased PTC-related Outreach and Communication with the Industry

From 2017 Through 2020

$483,834 in Civil Penalties

Beginning in 2017, FRA has assessed civil penalties against 26 railroads for failing to meet interim deadlines in their implementation schedules or to submit timely PTC progress reports.

41 Leadership Meetings with All Mandated Railroads

From January to February 2018, FRA met with the executive leadership of each of the 41 railroads subject to the statutory mandate to underscore the importance of the mandate and provide technical assistance.

10 Main PTC System Vendors and Suppliers

In the spring of 2018, FRA sent letters to, and met with, the 10 main PTC system vendors and suppliers. FRA continues to meet and engage with the suppliers and vendors supporting any at-risk railroads.

9 PTC Symposia and Collaboration Sessions

From 2018 through 2020, FRA held three meetings per year with all host railroads subject to the statutory mandate to ensure they understand the statutory and regulatory requirements and to facilitate timely compliance.

Monthly Northeast Corridor Meetings

Beginning July 2019, FRA meets monthly with the executive leadership of Amtrak and the 7 commuter railroads that operate on Amtrak’s Northeast Corridor and/or their own PTC-mandated main lines in the Northeast.

31 Leadership Meetings with 67 Tenant Railroads

During the summer of 2019, FRA met with the Class II, Class III, short line, switching, terminal, and regional tenant railroads that operate on PTC-mandated main lines, based on the current PTC Implementation Plans.

On-site Leadership Meetings in FL, IL, NJ, NM, NY, and TX

During 2019 and 2020, FRA met with host railroads and tenant railroads in Miami, Florida; Chicago, Illinois; and New York. In addition, FRA held on-site meetings in New Jersey and New Mexico in 2020.

Quarterly At-risk Railroad Letters

Throughout 2017, 2018, and 2020, FRA sent quarterly (and in some cases, monthly) letters to any at-risk railroads and the associated state departments of transportation and governors to urge timely implementation.

Monthly At-risk Railroad Meetings

Throughout 2018 and 2020, FRA met with at-risk railroads at least monthly to provide technical assistance about the remaining actions they must take to fully implement an FRA-certified and interoperable PTC system.

17 → 1 Railroads Considered at Risk of Not Meeting the Deadline

Based on railroads’ continued progress, the # of railroads FRA considers at risk of not fully implementing PTC systems by the statutory deadline decreased from 17 railroads in early 2017 to 1 railroad in late 2020.
Progression of FRA’s PTC Technical Assistance in the Field

Early Stages to 2017

- FRA’s PTC Specialists assisted railroads in the early stages with their PTC Development Plans and PTC Implementation Plans. Once the field work began, FRA monitored railroads’ progress.
- FRA’s fundamental improvement was prioritizing in-person assistance to railroads, including on-site meetings and test monitoring.

2018

- Specialists offered on-site support to “at-risk” railroads and ensured they understood the requirements to qualify for an alternative schedule under the statutory mandate, if necessary.
- Specialists held regular status update conference calls with railroads.
- Specialists conducted monthly or quarterly on-site visits to offer real-time interpretation of FRA’s PTC regulations.
- Specialists requested that certain vendors and suppliers be present during field testing to ensure progress, which gave FRA additional insight into some of the widespread challenges.

2019

- During 2019, FRA expedited the approval of test plans and documentation required to conduct interoperability testing and expand revenue service demonstration to additional mandated main lines. This included:
  - Conducting thorough reviews and issuing specialist-level approvals, which helped expedite testing and ensure that all functional requirements were verified.
  - Working closely with railroads to develop written instructions and procedures for testing and configuration management plans.
  - Participating in on-site meetings, white paper reviews, safety case assessments, and where appropriate, issuing conditional approvals, when new or modified PTC system functionality was proposed.
  - Providing interpretations of the regulatory and technical requirements, such as acceptable accuracy for the location of critical features, and minimum requirements for verifying a PTC system’s braking capability.

2020

- In 2020, FRA’s PTC specialists continue to provide as much, if not more, field-level technical support than previous years. However, FRA is providing that support in different and strategically focused ways. Examples of this include:
  - Weekly testing calls with at-risk railroads to discuss issues and obstacles and provide assistance as quickly as possible.
  - Enabling and encouraging railroads to cooperate and share technical information and lessons learned directly with each other and through FRA.
  - Providing more in-depth technical support to short line tenant railroads.
  - Providing technical support for long-term operation and maintenance of PTC systems, including configuration management.
  - Witnessing testing remotely, including video conferences, to ensure fewer people are positioned in the locomotive cabs during testing.
**Review and Decision Timelines for PTC Filings**
These graphics are as of September 2020, and do not include any draft or withdrawn documents or documents currently under review.

### Review to Decision Length of Most Common Filings Dropped Over Time

<table>
<thead>
<tr>
<th>Revised PTC Implementation Plans</th>
<th>PTC Safety Plans</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Review Length (days)</strong></td>
<td><strong>Review Length (days)</strong></td>
</tr>
<tr>
<td>0-100</td>
<td>0-100</td>
</tr>
<tr>
<td>100-200</td>
<td>100-200</td>
</tr>
<tr>
<td>200-300</td>
<td>200-300</td>
</tr>
<tr>
<td>300-400</td>
<td>300-400</td>
</tr>
</tbody>
</table>

#### Field Testing Requests

<table>
<thead>
<tr>
<th>Year Received</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Review Length (days)</strong></td>
<td>67</td>
<td>50</td>
<td>39</td>
<td>6</td>
</tr>
<tr>
<td><strong>Review Length (days)</strong></td>
<td>32</td>
<td>68</td>
<td>36</td>
<td>7</td>
</tr>
</tbody>
</table>

#### RSD Requests

<table>
<thead>
<tr>
<th>Year Received</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Review Length (days)</strong></td>
<td>112</td>
<td>73</td>
<td>52</td>
<td>42</td>
</tr>
<tr>
<td><strong>Review Length (days)</strong></td>
<td>88</td>
<td>85</td>
<td>85</td>
<td>85</td>
</tr>
</tbody>
</table>

### Review to Decision Length Lowered Even as Number of Filings Increased

- **All Review Lengths**
- **Average Review Length**

#### Timeline of Avg. Review Lengths

- **Number of Filings**
- **All Review Lengths**

<table>
<thead>
<tr>
<th>Quarter Received</th>
<th>2017 Q1</th>
<th>2017 Q3</th>
<th>2018 Q1</th>
<th>2018 Q3</th>
<th>2019 Q1</th>
<th>2019 Q3</th>
<th>2020 Q1</th>
<th>2020 Q3</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Avg. Review Length (days)</strong></td>
<td>113</td>
<td>136</td>
<td>141</td>
<td>97</td>
<td>85</td>
<td>85</td>
<td>68</td>
<td>63</td>
</tr>
<tr>
<td><strong>Number of Filings</strong></td>
<td>17</td>
<td>43</td>
<td>47</td>
<td>47</td>
<td>31</td>
<td>17</td>
<td>20</td>
<td>20</td>
</tr>
</tbody>
</table>