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**VIA Email**

April 30, 2021

Mr. Frank O'Connor  
Deputy Director, Office of Economics  
U.S. Surface Transportation Board (STB)  
395 E Street, SW  
Washington, DC 20423-0001

Dear Mr. O'Connor,

The States for Passenger Rail Coalition (SPRC) is an alliance of 23 State and Regional Transportation Officials and Passenger Rail Authorities across the United States. SPRC's mission is to promote the development, implementation, and expansion of Intercity Passenger Rail as part of an integrated national transportation network. Additionally, SPRC members sponsor a combined 29 intercity passenger rail routes serving 296 communities across America.

The purpose of this letter is to extend an offer to assist in the STB's efforts to develop plans to enforce on-time performance (OTP) rules for intercity passenger rail service. In your role as chair of the internal working group, we wish you and your colleagues' success in overseeing the Federal Railroad Administration rule released in November 2020 that establishes metrics and minimum standards.

The STB's role in fulfilling its authority to investigate and adjudicate issues regarding Amtrak's OTP under the new metrics and standards will be a vital component of the revival and expansion of passenger rail in our Nation. Recognizing that STB's efforts will be intensive in order to meet the July 1, 2021, implementation deadline, SPRC would welcome an opportunity to provide our input and feedback as your work proceeds.

Please do not hesitate to contact SPRC's Policy Consultant, Don Hannon, [DonHannon@iCloud.com](mailto:DonHannon@iCloud.com) /phone: (518) 928-2201, or me if we can assist in any way. Once again, best wishes to your team on this critical task.

Best Regards,

Arun Rao, AICP; Chair, States for Passenger Rail Coalition, Inc.  
Passenger Rail Manager, Wisconsin Department of Transportation Railroads and Harbors  
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