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September 14, 2015

The Honorable John Thune
Chairman
Committee on Commerce, Science, and Transportation
United States Senate
SD-511
Washington, DC 20510
By email via Patrick Fuchs at Patrick_Fuchs@commerce.senate.gov

Dear Chairman Thune:

This letter is in response to your request, dated September 4, 2015 regarding the deadline for implementation of Positive Train Control (PTC) systems. This issue has important implications for the rail and transit industry and we appreciate the opportunity to provide input.

Utah Transit Authority (UTA) is in the process of implementing PTC on our commuter rail system (known as "FrontRunner") that runs from Ogden, Utah, through Salt Lake City, and south to Provo, Utah. This project has received our highest priority since the mandate was passed in 2008. Although we continue to make progress, UTA does not anticipate meeting the December 31, 2015 deadline for full PTC implementation. Several challenges have combined to make meeting the December 31, 2015 deadline very difficult. Those challenges include:

- Securing necessary funding to implement a complex system that was not envisioned when we began construction of our commuter rail system;
- Limited support from equipment vendors;
- Lack of experienced contractors to design and install train control systems; and
- Limited time windows to install and implement PTC while continuing to provide passenger service to public transportation users.



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Despite these many issues, our target date for full implementation is July 2017. We are on track to achieve this deadline. The following table illustrates the progress we have made to date on the E-ATC system that will cover most of the FrontRunner trackage:

Table 1: E-ATC

E-ATC PTC Element	Units	Qty Required	Completed to Date	Remaining	% Complete
Locomotives	ea	18	18	0	100%*
Cab Cars	ea	22	22	0	100%*
Wayside Signal Case Modifications	ea	155	50	105	32%
Fiber Optic Backbone Modifications	miles	84	70	14	83%
Fiber Optic Communication Modifications	ea	155	86	69	55%
Back-Office Server	ea	1	0	1	0%

*No Code Proceed software update still required

FrontRunner service is also provided from Ogden to Pleasant View, Utah on a 4.65-mile segment of Union Pacific Railroad track, on which UTA operates as a tenant. Implementing PTC on this section of track is proving especially difficult, because of the interoperability issues involved with running on Union Pacific's trackage. The following table illustrates that there is still significant work to complete before we can implement the I-ETMS system that will be in place on that trackage:

Table 2: I-ETMS

I-ETMS PTC Element	Units	Qty Required	Completed to Date	Remaining	% Complete
Locomotives	ea	2	0	2	0%
Cab Cars	ea	2	0	2	0%
Back-office Server	ea	1	0	1	0%

If Congress does not extend the deadline, our options are limited. Union Pacific might not allow UTA to continue to operate on the Ogden to Pleasant View trackage if the deadline is not extended to July 2017. As for the rest of the FrontRunner system, we must seriously consider shutting down operations entirely on December 31, 2015. That puts us in a very difficult position, since the construction of much of the system was funded in part with grants from the Federal Transit Administration. Under those grants, we are required to provide commuter rail service. So, we are faced with a choice of operating FrontRunner and violating Federal Railroad Administration regulations or shutting down FrontRunner and violating commitments to the Federal Transit Administration.

Shutting down our FrontRunner system would have other devastating impacts. Over 16,000 daily trips would have to find alternative modes to get where they need to go. Most riders would likely get in their cars with attendant impacts to existing congestion, public safety, and Utah's clean air commitments. But our transit dependent and disabled passengers might not have any other options. The impact would extend far beyond FrontRunner passengers. FrontRunner is an integral part of our overall transit system, which spans 87 miles across four counties and dozens of communities, providing connections to bus and light rail service. Without FrontRunner, the entire system becomes far less efficient. A significant segment of our 45 million annual boardings would be relegated to Utah's already congested roadways.

Your letter inquires as to alternative common-sense safety requirements that may be put in place on an interim basis. The FrontRunner system currently includes a robust Automatic Train Control (ATC) cab signal system that meets many of PTC requirements. ATC is a proven technology that improves safety and should be considered an important step towards the completion of our full PTC system. Current testing, training, and ATC controls already create a high degree of safety that will only be augmented with our existing timeline for full PTC implementation.

The deadline should be extended through the end of 2017 to allow freight and passenger railroads the time necessary to fully design, procure, install, and implement this complex new technology.

We appreciate your leadership and the opportunity to discuss our concerns and provide information for your consideration as you address this critical issue. UTA continues to be committed to implementing PTC as quickly and safely as possible. We hope our current progress and improvements demonstrate our good faith efforts toward that goal. It is imperative that full PTC implementation be completed in the most reliable and safe manner possible to achieve the desired results. Your support in working to extend the PTC deadline is appreciated and necessary to the immediate success of the rail and transit industry.

Sincerely,



Jeffrey R. Benson
Interim President/CEO

