



Joe McHugh
Vice President, Government Affairs and Corporate Communications

August 7, 2012

The Honorable Ray LaHood
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

The Honorable Jonathan M. Young
Chairman
National Council on Disability
1331 F Street, N.W., Suite 850
Washington, DC 20004

The Honorable John Mica
Chairman
Committee on Transportation and
Infrastructure
House of Representatives
2165 Rayburn House Office Building
Washington, DC 20515

The Honorable Nick Rahall
Ranking Member
Committee on Transportation and
Infrastructure
House of Representatives
2163 Rayburn House Office Building
Washington, DC 20515

The Honorable Jay Rockefeller
Chairman
Committee on Commerce,
Science, and Transportation
United States Senate
254 Russell Senate Office Building
Washington, DC 20510

The Honorable Kay Bailey Hutchison
Ranking Member
Committee on Commerce,
Science and Transportation
United States Senate
560 Dirksen Senate Office Building
Washington, DC 20510

Dear Secretary LaHood, Chairmen Rockefeller and Mica and Ranking Members Hutchison and Rahall and Chairman Young:

As the Amtrak executive responsible for making the stations we serve compliant with the Americans with Disabilities Act (ADA), I am providing you with this update on our company's progress in this area. This letter focuses on our plans for FY 2013 and includes some of the steps we are taking to increase level boarding and the challenges we see ahead. In our previous report, submitted in May 2012, we detailed the specific platform requirements that changed as a result of a United States Department of Transportation September, 2011 rule and the interpretive guidance issued by the Department of Transportation in March of this year.

This is a very large, multi-year undertaking that will require significant financial resources and staff time. The Amtrak Executive Committee supports the efforts of Gary Talbot, who is the Amtrak ADA Program Director. As such, he coordinates the ADA-related efforts of the company across its several departments.



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Impact of the New DOT Platform Rule

In September, 2011, the DOT amended its regulations to require passenger rail providers such as Amtrak to ensure, at new and altered station platforms, that passengers with disabilities can get on and off any accessible car of the train, and to provide level-entry boarding where those platforms are adjacent to tracks that are used only by passenger rail. Prior to the promulgation of this rule, Amtrak had catalogued the complex pattern of ownership and responsibility for all stations¹, built cost estimates for our stations and developed a program designed to bring platforms and other components of those stations into compliance with the ADA rules and regulations as they then existed. It was immediately apparent that the new platform rule would require us to reassess our plans. We did so, and Amtrak has prepared a new comprehensive plan for compliance work that will guide both the near-term work scheduled for FY 2013, and the longer-term program.

In accordance with the new platform rule, we are required to provide level boarding at all stations where platforms are adjacent to passenger only rail, regardless of ridership volume. We decided that, consistent with the spirit of this new platform rule, Amtrak would strive to provide some form of level boarding at stations that recorded more than 7,500 passenger boardings and alightings per year. In FY 2011, of the approximately 390 stations served by Amtrak for which we have some degree of ADA responsibility, 280 stations posted more than 7,500 boardings and alightings while 110 posted fewer than 7,500 boardings and alightings. It should be noted that Amtrak operates different types of equipment for different services. For example, there are short-distance trains and long-distance trains that have three different boarding heights and some stations where the same platforms serve multiple types of passenger equipment.

Amtrak operates a 21,100 mile system, and 20,000 of those miles of track belong to other companies, principally freight railroads. Our platforms in these locations are owned primarily by the freight railroads but Amtrak typically has the ADA responsibility to ensure they are accessible. The challenge of

¹ Amtrak serves over 500 stations; however, we own only 63 of the station structures. Nevertheless, we have at least partial ADA responsibility for some component (i.e., station structure, platform or parking lot) of approximately 390 stations.



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reconciling the requirements of existing freight traffic with the needs of our passengers makes this a major task. The DOT has issued subsequent guidance on “existing freight operations” that clarifies the requirement and requires a detailed station-by-station evaluation to determine where level boarding is required. At stations where multiple tracks are available to carry freight – or multiple platforms exist for passenger loading – a platform-by-platform and track-by-track analysis and subsequent negotiation with the host railroad will be conducted to determine the proper approach. Finally, FRA approval will be required for certain platform designs before Amtrak can proceed with work.

The complexity of the challenge and the scale of the system have created a requirement for considerable additional analysis which will result in additional time and higher costs than estimated in 2009. Nevertheless, Amtrak is committed to this effort. To reinforce this commitment, on July 2, 2012, Amtrak President and Chief Executive Officer Joseph Boardman wrote to all employees that “as a public transportation provider, Amtrak is required to comply with this legislation by making sure that the equipment, facilities and services used by our passengers are accessible to people with disabilities in accordance with applicable regulations. I consider this to be an extremely important and moral responsibility for this company to embrace and to carry out”.

FY 2012 Accessible Stations Development Program (ASDP)

Amtrak’s revised program includes a complete master schedule for the stations for which Amtrak has some degree of responsibility for accessibility. Design and contract work is generally following the geographic bundling strategy described in previous reports. Projects are bid out for work as groups to allow a more cost-effective approach and quicker completion. A project management firm has been retained to oversee and manage the process.

Amtrak expects to spend approximately \$50 million on our Accessible Stations Development Program (ASDP) in FY 2012. Nearly all of the 110 stations for which Amtrak has some degree of ADA responsibility and that have fewer than 7,500 boardings or alightings annually are currently in the early phases (e.g., survey, assessment, design) of the ASDP, and construction is underway at another nine. We had hoped to complete more stations, but the new platform rule required us to suspend the then-existing program, reassess our overall plan and reorder our priorities and work. The first two contract bundles included nine stations, and the major work elements at those stations will be completed in FY 2012.



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These stations will have low level platforms and will use station-based mobile lifts. The total contract value is approximately \$7.5 million.

Work is also progressing on identifying opportunities to provide level boarding or a solution close to level boarding at stations that have more than 7,500 boardings and alightings annually. Approximately 221 of Amtrak's stations with ridership above 7,500 boardings and alightings annually are served by tracks that carry freight adjacent to the platform. In most of these cases, the freight carriers set the clearance requirements at the stations we serve. In some cases, the mandated clearances for high level platforms would result in gaps of four or more feet between a passenger railcar and the setback station platforms, and this complicates the situation considerably. The FRA has requested that we work with the host railroads to route freight traffic away from platforms, allowing construction of level boarding platforms rather than setback platforms.

For those situations where level boarding is not feasible due to existing freight traffic, for example, Amtrak has convened a team to study and propose alternate designs that will satisfy both the requirements of freight service and the needs of our passengers. Various possibilities such as the use of lightweight bridgeplates that will be easy for crews to deploy quickly or mechanical boarding bridges are under study, and are expected to form part of an eventual solution set. We are also examining the possibility of prefabricated and easily deployable platforms and ramps in some locations. We expect to make good progress on determining the viability of this approach during FY 2013.

FY 2013 Accessible Stations Development Program

While the changes stemming from the new platform rule have necessitated some reevaluation and some corresponding shifts in our programs and work plans, Amtrak remains committed to the goal stated in our recent Strategic Plan, of expediting ongoing programs designed to make Amtrak service accessible for all individuals. We have worked hard to develop a program that will respond to the needs of passengers with disabilities and ensure that Amtrak complies with the ADA and the applicable Federal regulations. By the close of FY 2013, we hope to have construction work substantially completed at 19 stations and construction contracts awarded at an additional 25 stations, six of which will provide (or already provide) level boarding. Among the stations slated for contract award are the Sanford, Florida and Lorton, Virginia stations which serve more than a quarter of a million *Auto Train* passengers annually. When complete, these facilities will provide all *Auto Train* passengers with level boarding platforms at 15 inch



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above top of rail (ATR). We will also commence design at 21 stations, five of which provide (or already provide) level boarding. All of this activity is in addition to the survey, assessment and design work already underway at stations throughout the country. In addition, we will be implementing those "special projects" identified on the attached document, including the installation of additional elevators at Washington Union Station to provide access to tracks 27 and 28. This coming year will be a critical one for us, as it will be the year in which we develop the experience and set the pace for coming years, while establishing a benchmark of useful work and proven solutions.

This is going to be a challenging year, and as we move forward we understand that the tasks we face are going to require considerable technical ingenuity, support from the freight railroads and other third parties, and financial support. In spite of these challenges, our program is progressing and we expect to increase our productivity as more stations move out of the design process and into the procurement and construction phases in the coming year.

The attached supplementary material will provide further details of our planned \$80 million program for FY 2013. Amtrak is committed to that program, as we have both a moral responsibility and obligation to do so.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe McHugh". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

Joe McHugh
Vice President

Government Affairs and Corporate Communications

Enclosures

FY13 ASDP Update

Projected Station Design and Construction

Start of Design		
Count	Station	State
1	Wilmington*	DE
2	Burlington	IA
3	Sandpoint	ID
4	Lafayette	LA
5	Lake Charles	LA
6	Baltimore*	MD
7	BWI Marshall Airport*	MD
8	New Carrollton*	MD
9	Claremont	NH
10	Port Henry	NY
11	Rouses Point	NY
12	Westport	NY
13	Beaumont	TX
14	Del Rio	TX
15	Longview	TX
16	San Antonio**	TX
17	Helper	UT
18	Provo	UT
19	Bellows Falls	VT
20	Castleton	VT
21	Windsor	VT
Total Start of Design		21

FY 13 Work Summary:	
Category	Count
Substantial Completion*	19
Contracts Awarded*	35
Start of Design	21
*Overlap	(10)
Total number of stations with any type of activity or work	65

Contracts Awarded		
Count	Station	State
1	Anniston	AL
2	Williams Junction	AZ
3	Winslow	AZ
4	Yuma	AZ
5	Barstow	CA
6	Ontario	CA
7	Palm Springs	CA
8	Pomona	CA
9	Victorville	CA
10	Jacksonville*	FL
11	Okeechobee	FL
12	Sanford**	FL
13	Tampa*	FL
14	Gainesville	GA
15	Savannah*	GA
16	Gilman	IL
17	Dyer	IN
18	Michigan City	IN
19	Rensselaer	IN
20	Fort Ticonderoga	NY
21	Port Kent	NY
22	Whitehall	NY
23	Alliance	OH
24	Bryan	OH
25	Elyria	OH
26	Lancaster*	PA
27	Camden	SC
28	Denmark	SC
29	Lorton**	VA
30	Staunton	VA
31	Randolph	VT
32	St. Albans	VT
33	Waterbury	VT
34	Prince	WV
35	White Sulphur Springs	WV
Total Contracts Awarded		35

Contracts Substantial Completion		
Count	Station	State
1	Auburn	CA
2	Berkeley	CA
3	Guadalupe	CA
4	Lompoc-Surf	CA
5	Needles	CA
6	Redding	CA
7	San Luis Obispo	CA
8	Stockton (San Joaquin St.)	CA
9	Turlock-Denair	CA
10	Michigan City	IN
11	Rensselaer	IN
12	Port Kent	NY
13	Whitehall	NY
14	Alliance	OH
15	Elyria	OH
16	Staunton	VA
17	Randolph	VT
18	Waterbury	VT
19	White Sulphur Springs	WV
Total Substantial Completion		19

Legend	
(bold)	Denotes Level Boarding
*	High Level Boarding Platform (48 inch ATR)
**	Low Level Boarding Platform (15 inch ATR)

FY13 Special Project Highlights

- Train Car to Platform Gap “Elimination/Mitigation” Project
 - Both passenger only and shared use setback platforms
 - Design requirement specification developed
 - Contractor to be selected and contract awarded for design and prototype of solution(s)
- Washington Union Station Engineering Feasibility Study
 - Rehabilitation of track 21 and rebuild of platform to 15 inch ATR
 - Level boarding platforms for tracks 15/16 and tracks 16/17
 - Both platforms built to 48 inch ATR
- Washington Union Station elevator design
 - Track 27/28 platform, currently has no elevator
- Passenger Information and Display System (PIDS)
 - National program to be developed
 - ASDP Initiatives (5 stations)
- Wilmington Station Elevator Study
 - Engineering feasibility study for redundant elevator