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PUBLIC  
TRANSPORTATION  
ASSOCIATION**

March 30, 2021

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**PRESIDENT AND CEO**

Paul P. Skoutelas

The Honorable Robert L. Sumwalt  
Chairman  
National Transportation Safety Board  
490 L'Enfant Plaza, SW  
Washington, D.C. 20594

Dear Chairman Sumwalt:

On behalf of the 29 commuter railroad agencies of the American Public Transportation Association (APTA), we respectfully request that the National Transportation Safety Board (NTSB) remove from its "Most Wanted" list of safety recommendations the requirement that commuter railroads fully implement Positive Train Control (PTC). After commuter rail agencies invested more than \$4 billion to implement PTC, all commuter railroads successfully implemented PTC by the statutory deadline of December 31, 2020.

Industry-wide implementation of PTC has been a massive undertaking, achieved only through dedication and innovation by these operators along with PTC equipment providers, consultants, and the Federal Railroad Administration. Technological systems needed to be developed, customized, and installed to meet the unique operating requirements of each and every rail operator while ensuring that the PTC system was interoperable with other passenger and freight operators that share the tracks with commuter rail operators. In addition to the \$4 billion implementation cost, commuter rail operators will spend more than \$100 million each year to maintain and operate the PTC system.

Riding commuter rail is 18 times safer than driving an auto, and the commuter railroad's monumental achievement of PTC certification will make commuter rail service even safer. Accordingly, we request that the NTSB remove full implementation of PTC from its Most Wanted list of recommendations.

If you have questions regarding this request or commuter rail safety generally, please contact Ward McCarragher, Vice President, Government Affairs and Advocacy, at [wmccarragher@apta.com](mailto:wmccarragher@apta.com).

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The Honorable Robert L. Sumwalt

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Thank you for your consideration and all of your efforts on behalf of transportation safety.

Sincerely,



Paul P. Skoutelas  
President and CEO

cc: The Honorable Bruce Landsberg, Vice Chairman

The Honorable Jennifer Homendy, Member

The Honorable Michael E. Graham, Member

The Honorable Thomas B. Chapman, Member