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March 17, 2017

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Richard A. White

Department of Transportation
Docket Operations
M-30, West Building Ground Floor, Room W12-140
1200 New Jersey Avenue S.E.
Washington, DC 20590

RE: FTA- 2016-0041

Dear Docket Clerk:

On behalf of the more than 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comments on the Federal Transit Administration's (FTA) Proposed General Directive 17-1 (GD 17-1), Stop Signal Overruns on Rail Fixed Guideway Public Transportation Systems, published on January 17, 2017 at 82 FR 4964.

About APTA

APTA is a non-profit international trade association of more than 1,500 public and private member organizations, including public transit systems; high-speed intercity passenger rail agencies; planning, design, construction and finance firms; product and service providers; academic institutions; and state associations and departments of transportation.

General Comments

APTA has surveyed its member organizations seeking comments in response to the proposed general directive. In general, APTA members understand and support any efforts to improve safety for passengers and employees. There are major areas of concern, however, that are summarized below:

1. Per FTA, GD 17-1 is based largely on the submissions received from State Safety Oversight Agencies (SSOAs) in response to Safety Advisory (SA) 16-1 regarding stop signal overruns. Will FTA make any SA 16-1 information available to SSOAs or transit agencies, even if in aggregated format so as not to disclose identifying information?

2. FTA indicates there is a lack of standardization regarding how transit agencies define, report, and track stop signal overruns. The variety of industry signal system types and differences in definitions prevents FTA from conducting an in-depth, industrywide analysis. If signal systems throughout the industry remain diverse, what is FTA's intent with this Directive regarding standardization? FTA said that it could not do much with the Safety Advisory reports from SA 16-1 because each report was so different from one another. It seems FTA runs the risk of collecting again different information from various transit agencies because FTA has not set common definitions and/or standards to follow. Ultimately, if FTA clarifies its goal(s) and objectives that would improve the industry's ability to respond to GD 17-1. Overall, as part of the final GD 17-1, FTA needs to establish a common language, terminologies and definitions among transit agencies.

3. Most stop signal overruns are "nonconsequential" under the definition put forth in GD 17-1 because it results in no contact, injury, or property damage. Does FTA want this evaluation and development of corrective actions to apply to "consequential" stop signal overruns only?

4. The definition of "stop signal overrun" in GD 17-1 is "a revenue or nonrevenue rail transit vehicle passing any signal displaying a visual aspect that indicates to an operator that a train does not have authority to proceed". Does this apply to maintenance-of-way vehicles? If so, does it apply to maintenance vehicles operated by a contractor? (i.e., is FTA using the definition of "rail transit vehicle" from 659 or 674?)

5. What are the considerations for security sensitive information (SSI) that may be involved in the signal system safety risk evaluation and corrective action plans? Will FTA establish a secure means of submitting information, or will FTA accept summary information only that is not considered SSI?

6. There is a statement on page 2 that says SSOAs do not actively investigate these events (Stop Signal Overruns). FTA needs to provide direction regarding what constitutes "actively investigating." In addition, a clear definition of stop signal overrun would also be helpful.

7. FTA must provide a sample template to encourage consistency in the reporting.

8. We disagree with the concept that a "close call" or "near miss" is a nonconsequential event.

9. Will FTA make grants funds available to assist transit agencies with funding the design and implementation of an Automatic Train Protection technology? Overall, compliance with this proposal will represent a significant impact on limited resources. The availability of dedicated federal funds will facilitate adoption.

10. Developing a risk evaluation of potential consequences of hazards relating to stop signal overruns after the final GD 17-1 proposal needs more time. We feel that the proposed 90 days following the issuance of the final GD 17-1 to perform a hazard analysis of all stop overrun scenarios within a system is not sufficient given the requested evaluation measures. We propose that 180 days would be achievable.

11. Page 8 states that transit agencies do not need to study each individual signal, however, page 9 seems to indicate that transit agencies need to look at each signal approach and beyond the stop signal. Please clarify the scope as to what is required? Can transit agencies group similar signal configurations together to minimize the number of locations required?

12. Is there a differentiation between street running versus corridor or Automatic Block Signaling versus traffic signal control?

13. The proposed 150 days after final GD17-1 for transit agencies to submit a Corrective Action Plan to their SSOA is insufficient. We recommend instead a one year time frame to complete this.

14. How far back does an agency need to go in conducting its systematic analysis of stop signal overruns?

We appreciate the opportunity to assist FTA in this important endeavor. For additional information, please contact Linda Ford, APTA's Chief Counsel, at (202) 496-4808 or lford@apta.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard A. White". The signature is fluid and cursive, with the first name being the most prominent.

Richard A. White
Acting President & CEO

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