1. APTA supports the implementation of Positive Train Control (PTC), a national safety priority, on all commuter and intercity passenger rail lines.

2. APTA supports PTC Interoperability as per the federal requirement.

3. APTA strongly supports direct federal funding to commuter and intercity passenger railroads to cover not less than 80% of their implementation costs. Funding needs to be appropriated to reimburse agencies to support the implementation of PTC.

4. APTA supports providing the Secretary of Transportation with the authority to extend the PTC implementation deadline for individual agencies if the Secretary determines that:
   • Full implementation will likely be infeasible due to circumstances beyond the control of the agency, including funding availability, spectrum acquisition, resource and technology availability, and interoperability standards;
   • The agency has demonstrated good faith in its positive train control implementation;
   • The agency has presented a revised Positive Train Control Implementation Plan indicating how it will fully implement positive train control as soon as feasible.
   • The agency has submitted a request for extension prior to the December 31, 2015 deadline.

5. APTA strongly supports legislation that would direct the FCC to provide radio spectrum, and other measures as necessary, without cost, for PTC implementation for commuter and intercity passenger rail.

6. APTA supports the FRA’s position in regards to Alternative Safety Technology Recommendation in that alternative risk technologies be considered, in lieu of a PTC system on specified line segments under the premise that the alternative technology provides equal or greater safety benefits as provided by PTC as determined by FRA.

7. Develop Open Standards - The FRA should promulgate interface and communication standards permitting interoperability of PTC products within the system hardware architecture. The intent is to provide open communication messaging and transmission standards between different suppliers of products to increase competition among providers.