

June 25, 2020

Dear fellow RPA members and passenger train advocates:

Amtrak has announced that all currently-daily long-distance trains (except the Lorton, VA – Sanford, FL *Auto Train*) will experience reductions in frequency due to the COVID-19 pandemic. Effective July 6, 2020, the New York-Miami *Silver Meteor* will operate only four days per week, and the New-York-Miami *Silver Star* will operate only three days per week. All other daily long-distance trains are to be reduced to three-days-per-week operation October 1, 2020.

Historically speaking, reductions in frequencies have been a commonplace “solution” when Amtrak finds itself short of money, equipment, or both. But history also shows that reducing the frequency rarely – if ever – actually saves money, especially considering the resulting loss in revenue and the general chaos created for travelers who need to build a trip around multiple less-than-daily trains. Usually, the result is that these travelers simply choose another mode of transportation.

Amtrak has not officially announced the day of operation of the trains that will begin operating three days per week in October, but a source at Amtrak has provided the probable days of operation. As information, the current schedule and days of operation starting in October are indicated below.

Since the Amtrak announcement, numerous entities such as RPA and other passenger train advocacy groups have voiced their opposition to the Amtrak service reductions. Some of the reasons to oppose less-than-daily service are:

1. Loss of market share due to less access to service;
2. Loss of revenue from fewer patrons and fewer passengers connecting between trains because multiple less-than-daily trains create connections which are extremely cumbersome (such as overnight stays). Also, if less-than-daily trains DO happen to connect at a place like Chicago, Amtrak will see vastly increased expense with regard to misconnecting passengers if inbound trains are late because the next available train will always be two or three days away.
3. The inability to properly gauge when daily service can be reinstated after a cure or vaccine for COVID-19 is widely distributed because tri-weekly service suppresses demand due to its undesirability.
4. Less mobility access at many of the communities served by these long-distance trains which are often the only public transportation.
5. Loss of jobs during a time of high COVID-19-related unemployment. Those Amtrak employees who are “laid off” may indeed succeed in finding alternate employment, which will then make reinstatement of daily service on these routes all the more difficult due to a smaller pool of qualified individuals.

While these reasons – and others – are all valid concerns, I believe RPA should focus more on the operations aspect of long-distance trains and how reducing their frequency will save little

money and, in some cases, could actually increase Amtrak's operating costs. Basically, it boils down to the inefficiencies of limited economies of scale – something which is exacerbated by frequency reductions.

What follows are examinations of costs to be considered for the pending Tri-Weekly operation, using the *Empire Builder* as an example:

## The Empire Builder

7/27	7/27 current		Train number		8/28 current	8/28
Tri-Weekly	Daily		Frequency of Operation		Daily	Tri-Weekly
Read Down	Read down				Read up	Read up
SuTuTh	215 PM	Dp	Chicago, IL (CT) T E O	Ar	401 PM	WeFrMo
SuTuTh	239 PM	Dp	Glenview, IL	Ar	318 PM	WeFrMo
SuTuTh	315 PM	Dp	Sturtevant, WI (Racine)	Dp	237 PM	WeFrMo
SuTuTh	331 PM	Dp	Milwaukee Airport, WI	Dp	224 PM	WeFrMo
SuTuTh	358 PM	Dp	Milwaukee, WI	Ar	215 PM	WeFrMo
SuTuTh	503 PM	Dp	Columbus, WI	Dp	1257 PM	WeFrMo
SuTuTh	535 PM	Dp	Portage, WI	Dp	1227 PM	WeFrMo
SuTuTh	552 PM	Dp	Wisconsin Dells, WI	Dp	1208 PM	WeFrMo
SuTuTh	631 PM	Dp	Tomah, WI	Dp	1126 AM	WeFrMo
SuTuTh	714 PM	Dp	La Crosse, WI	Dp	1047 AM	WeFrMo
SuTuTh	747 PM	Dp	Winona, MN T E	Ar	1011 AM	WeFrMo
SuTuTh	853 PM	Dp	Red Wing, MN	Dp	854 AM	WeFrMo
SuTuTh	1009 PM	Ar	St. Paul/Minneapolis, MN - SPUD	Dp	800 AM	WeFrMo
SuTuTh	1020 PM	Dp	St. Paul/Minneapolis, MN - SPUD	Ar	743 AM	WeFrMo
MoWeFr	1224 AM	Dp	St. Cloud, MN T E	Dp	519 AM	WeFrMo
MoWeFr	126 AM	Dp	Staples, MN	Dp	414 AM	WeFrMo
MoWeFr	222 AM	Dp	Detroit Lakes, MN	Dp	315 AM	WeFrMo
MoWeFr	324 AM	Dp	Fargo, ND-Moorhead, MN	Dp	218 AM	WeFrMo
MoWeFr	441 AM	Dp	Grand Forks, ND	Dp	102 AM	WeFrMo
MoWeFr	602 AM	Dp	Devils Lake, ND	Dp	1137 PM	TuThSu
MoWeFr	656 AM	Dp	Rugby, ND	Dp	1043 PM	TuThSu
MoWeFr	829 AM	Ar	Minot, ND T E	Dp	947 PM	TuThSu
MoWeFr	906 AM	Dp	Minot, ND T E	Ar	927 PM	TuThSu
MoWeFr	957 AM	Dp	Stanley, ND	Dp	801 PM	TuThSu
MoWeFr	1107 AM	Dp	Williston, ND (CT)	Dp	659 PM	TuThSu
MoWeFr	1141 AM	Dp	Wolf Point, MT (MT)	Dp	423 PM	TuThSu
MoWeFr	1226 PM	Dp	Glasgow, MT	Dp	337 PM	TuThSu
MoWeFr	125 PM	Dp	Malta, MT	Dp	242 PM	TuThSu
MoWeFr	239 PM	Ar	Havre, MT	Dp	122 PM	TuThSu
MoWeFr	304 PM	Dp	Havre, MT	Ar	102 PM	TuThSu
MoWeFr	522 PM	Dp	Shelby, MT T E	Dp	1133 AM	TuThSu
MoWeFr	551 PM	Dp	Cut Bank, MT	Dp	1040 AM	TuThSu
MoWeFr	628 PM	Dp	Browning, MT (seasonal)	Dp	1005 AM	TuThSu
MoWeFr	645 PM	Dp	East Glacier Park, MT (seasonal)	Dp	949 AM	TuThSu
MoWeFr	741 PM	Dp	Essex, MT	Dp	850 AM	TuThSu

MoWeFr	823 PM	Dp	West Glacier Park, MT	Dp	811 AM	TuThSu
MoWeFr	856 PM	Ar	Whitefish, MT E	Dp	741 AM	TuThSu
MoWeFr	916 PM	Dp	Whitefish, MT E	Ar	721 AM	TuThSu
MoWeFr	1059 PM	Dp	Libby, MT (MT)	Dp	521 AM	TuThSu
MoWeFr	1149 PM	Dp	Sandpoint, ID (PT)	Dp	230 AM	TuThSu
TuThSa	140 AM	Ar	Spokane, WA T E	Dp	125 AM	TuThSu
	27		Train Number		28	
TuThSa	245 AM	Dp	Spokane, WA T E	Ar	1213 AM	TuThSu
TuThSa	535 AM	Dp	Pasco-Richland-Kennewick, WA E	Dp	857 PM	MoWeSa
TuThSa	730 AM	Dp	Wishram, WA	Dp	655 PM	MoWeSa
TuThSa	804 AM	Dp	Bingen-White Salmon, WA/Hood River, OR	Dp	621 PM	MoWeSa
TuThSa	918 AM	Dp	Vancouver, WA	Dp	507 PM	MoWeSa
TuThSa	1010 AM	Ar	Portland, OR (PT) T E O	Dp	445 PM	MoWeSa
	7		Train Number		8	
TuThSa	215 AM	Dp	Spokane, WA T E	Ar	1240 AM	TuThSu
TuThSa	422 AM	Dp	Ephrata, WA	Dp	942 PM	MoWeSa
TuThSa	535 AM	Dp	Wenatchee, WA E	Dp	842 PM	MoWeSa
TuThSa	608 AM	Dp	Leavenworth, WA	Dp	800 PM	MoWeSa
TuThSa	838 AM	Dp	Everett, WA	Dp	539 PM	MoWeSa
TuThSa	910 AM	Dp	Edmonds, WA	Dp	507 PM	MoWeSa
TuThSa	1025 AM	Ar	Seattle, WA (PT) T E O	Dp	440 PM	MoWeSa

Above: Though not specifically yet announced, this is the current schedule along with the expected days of operation beginning in October.

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## Operating and on-board personnel:

Crew change points indicated in pale green. Example:

MoWeSa	215 PM	Dp	Chicago, IL (CT) T E O	Ar	355 PM	WeFrSu
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**T**=Train crew change location

**E**=Engine crew change location

**O**=On board service crew change location

This is a summary of crew rotation to compare daily versus tri-weekly operation. Layover times are based on departure times from terminals (not on duty times, for simplicity; normally, crews are on duty 45 minutes prior to train arrival or expected arrival).

**Train Crews:** (The train crew can be 1 to 3 people, so the comparison is just a generic “crew,” assuming that the number of people per train would be constant under daily or tri-weekly operation.)

From Seattle, train 8:
Daily Operation: Arrive Spokane 1240 AM, layover 25 hours, 35 minutes to protect train 7 the following day.
Tri-Weekly Operation: Arrive Spokane 1240 AM Tuesday arrival lays over 49 hours, 35 minutes to protect train 7 Thursday.

Thursday arrival lays over 49 hours, 35 minutes to protect train 7 Saturday.  
Sunday arrival lays over 49 hours, 35 minutes to protect train 7 Tuesday.

From Portland, train 28:

Daily Operation: Arrive Spokane 1213 AM, layover 26 hours, 32 minutes to protect train 27 the following day.

Tri-Weekly Operation: Arrive Spokane 1213 AM  
Tuesday arrival lays over 50 hours, 32 minutes to protect train 27 Thursday.  
Thursday arrival lays over 50 hours, 32 minutes to protect train 27 Saturday.  
Sunday arrival lays over 50 hours, 32 minutes to protect train 27 Tuesday.

From Shelby train 7/27:

Daily Operation: Arrive Spokane 140 AM, layover 23 hours, 45 minutes to protect train 8/28 the following day.

Tri-Weekly Operation: Arrive Spokane 140 AM  
Tuesday arrival lays over 47 hours, 45 minutes to protect train 8/28 Thursday.  
Thursday arrival lays over 71 hours, 45 minutes to protect train 8/28 Sunday.  
Sunday arrival lays over 71 hours, 45 minutes to protect train 8/28 Tuesday.

From Shelby train 8/28:

Daily Operation: Arrive Minot 927 PM, layover 11 hours, 39 minutes to protect train 7/27 the following day.

Tri-Weekly Operation: Arrive Minot 927 PM.  
Tuesday arrival lays over 11 hours, 39 minutes to protect train 7/27 Wednesday.  
Thursday arrival lays over 11 hours, 39 minutes to protect train 7/27 Friday.  
Sunday arrival lays over 11 hours, 39 minutes to protect train 7/27 Monday  
No change in layover from daily operation.

From St. Cloud train 7/27:

Daily Operation: Arrive Minot 829 AM.  
Layover 13 hours, 18 minutes to protect train 8/28 that same day.

Tri-Weekly Operation: Arrive Minot 829 AM.  
Monday arrival lays over 37 hours, 18 minutes to protect train 8/28 Tuesday.  
Wednesday arrival lays over 37 hours, 18 minutes to protect train 8/28 Thursday.  
Friday arrival lays over 61 hours, 18 minutes to protect train 8/28 Sunday.

From St. Cloud train 8/28:

Daily Operation: Arrive Winona 1011 AM, protects train 7/27 that same evening at 747 PM with 4-or-more hour release. (12 hours to work round trip St. Cloud to Winona, excluding rest in Winona).

Tri-Weekly Operation: Arrive Winona 1011 AM.  
Monday arrival lays over 33 hours, 36 minutes to protect train 7/27 Tuesday.  
Wednesday arrival lays over 33 hours, 46 minutes to protect train 7/27 Thursday.  
Friday arrival lays over 57 hours, 46 minutes to protect train 7/27 Sunday.

From Chicago train 7/27:

Daily Operation: Arrive Winona 747 PM Layover 14 hours, 24 minutes to protect train 8/28 the following morning.
Tri-Weekly Operation: Arrive 747 PM. Sunday arrival lays over 14 hours, 24 minutes to protect train 8/28 the following morning. Tuesday arrival lays over 14 hours, 24 minutes to protect train 8/28 the following morning. Thursday arrival lays over 14 hours, 24 minutes to protect train 8/28 the following morning. Same rotation as daily operation.

**Extra days of layover with tri-weekly schedule without deadheading: Trainmen**

Train	Home terminal	Away terminal	Extra days per week
8	Seattle	Spokane	3
28	Portland	Spokane	3
7/27	Shelby	Spokane	5
8/27	Shelby	Minot	0
7/27	St. Cloud	Minot	4
8/28	St. Cloud	Winona	4
7/27	Chicago	Winona	0
<b>TOTAL</b>			<b>19</b>

The train has seven crew districts as indicated above. A daily operation is 7 days per week, or 49 crew starts per week from the home terminal and 49 from the away-from-home terminal for a total of 98 total crew starts. A tri-weekly operation would be 42 crew starts (7 districts times 3 days per week times two for starts at both home and away-from-home terminals). But the crews spend an additional 19 nights at a hotel (and get paid for each day there, which is in effect another crew start), which increases the tri-weekly operation to 61 crew starts per week. So, while tri-weekly operation reduces the number of trains operated by 57%, the number of crew starts (including layover days) is reduced by only 37 total or 38%

**Engine Crews:** (The engine crew can be 1 or 2 people, so the comparison is just a generic “crew, assuming that the number of people per train would be constant under daily or tri-weekly operation.)

Through an agreement with its **engineers**, Amtrak can operate trains with only one person (instead of two) on runs less than 6 hours. To facilitate this, Amtrak has inserted crew change points for engineers between Shelby and Spokane (at Whitefish), Spokane and Seattle (at Wenatchee), and Spokane and Portland (at Pasco). This is how engineer runs would be affected by this tri-weekly schedule:

From Seattle, train 8:
Daily Operation: Arrive Wenatchee 842 PM, layover 8 hours, 53 minutes to protect train 7 the following day, taking short rest (4 or more hours) as necessary.
Tri-Weekly Operation: Arrive Wenatchee 842 PM. Monday arrival lays over 56 hours, 53 minutes to protect train 7 Thursday. Thursday arrival lays over 56 hours, 53 minutes to protect train 7 Saturday. Saturday arrival lays over 56 hours, 53 minutes to protect train 7 Tuesday.

From Portland, train 28:
Daily Operation: Arrive Pasco 857 PM, layover 8 hours, 38 minutes to protect train 27 the following day, taking short rest (4 or more hours) as necessary.
Tri-Weekly Operation: Arrive Pasco 857 PM. Monday arrival lays over 56 hours, 38 minutes to protect train 27 Thursday. Thursday arrival lays over 56 hours, 38 minutes to protect train 27 Saturday. Saturday arrival lays over 56 hours, 38 minutes to protect train 27 Tuesday.

From Spokane train 7:
Daily Operation: Arrive Wenatchee 535 AM, layover 15 hours, 7 minutes to protect train 8 that same evening.
Tri-Weekly Operation: Arrive Wenatchee 535 AM. Tuesday arrival lays over 39 hours, 7 minutes to protect train 8 Wednesday. Thursday arrival lays over 63 hours, 7 minutes to protect train 8 Saturday. Saturday arrival lays over 15 hours, 7 minutes to protect train 8 that same evening.

From Spokane train 27:
Daily Operation: Arrive Pasco 535 AM, layover 15 hours, 22 minutes to protect train 28 that same evening.
Tri-Weekly Operation: Arrive Pasco 535 AM. Tuesday arrival lays over 39 hours, 22 minutes to protect train 28 Wednesday. Thursday arrival lays over 63 hours, 22 minutes to protect train 28 Saturday. Saturday arrival lays over 15 hours, 22 minutes to protect train 28 that same evening.

From Spokane train 8/28:
Daily Operation: Arrive Whitefish 721 AM, layover 13 hours, 55 minutes to protect train 7/27 that same evening.
Tri-Weekly Operation: Arrive Whitefish 721 AM. Tuesday arrival lays over 37 hours, 55 minutes to protect train 7/27 Wednesday. Thursday arrival lays over 37 hours, 55 minutes to protect train 7/27 Saturday. Sunday arrival lays over 37 hours, 55 minutes to protect train 7/27 Monday.

From Shelby train 7/27:
Daily Operation: Arrive Whitefish 856 PM, layover 10 hours, 45 minutes to protect train 8/28 the following morning.
Tri-Weekly Operation: Arrive Whitefish 856 PM. Monday arrival lays over 10 hours, 45 minutes to protect train 8/28 Tuesday. Wednesday arrival lays over 10 hours, 45 minutes to protect train 8/28 Thursday. Friday arrival lays over 34 hours, 45 minutes to protect train 8/28 Sunday.

**Extra days of layover with tri-weekly schedule without deadheading: Engineer**

Train	Home terminal	Away terminal	Extra days per week
8	Seattle	Wenatchee	6
28	Portland	Pasco	6
7	Spokane	Wenatchee	3

<b>27</b>	<b>Spokane</b>	<b>Pasco</b>	<b>3</b>
<b>8/28</b>	<b>Spokane</b>	<b>Whitefish</b>	<b>3</b>
<b>7/27</b>	<b>Shelby</b>	<b>Whitefish</b>	<b>1</b>
<b>8/27</b>	<b>Shelby</b>	<b>Minot</b>	<b>0</b>
<b>7/27</b>	<b>St. Cloud</b>	<b>Minot</b>	<b>4</b>
<b>8/28</b>	<b>St. Cloud</b>	<b>Winona</b>	<b>4</b>
<b>7/27</b>	<b>Chicago</b>	<b>Winona</b>	<b>0</b>
<b>TOTAL</b>			<b>30</b>

Engineers have ten crew districts as indicated above. A daily operation is 7 days per week, or 70 crew starts per week from the home terminal and 70 from the away-from-home terminal for a total of 140 total crew starts. A tri-weekly operation would be 60 crew starts (10 districts times 3 days per week times two for starts at both home and away-from-home terminals). But the crews spend an additional 30 nights at a hotel (and get paid for each day there, which is in effect another crew start), which increases the tri-weekly operation to 90 crew starts per week. So, while tri-weekly operation reduces the number of trains operated by 57%, the number of crew starts (including layover days) is reduced by only 50 total or 36%.

**Synopsis of train and engine crew rotation:** The reduction in number of crew starts is much less than the reduction in number of trains per week to the point that overall “savings” would be minimal. Any “savings” would of course be offset by loss of revenue which naturally happens with a reduction in service, as well as loss of revenue from missed connections which is exacerbated when multiple trains operate less than daily. Moreover, the scenarios above for train and engine crews laying over extra days at away-from-home terminals would likely be overshadowed by “quality-of-life” issues where Amtrak would be forced to deadhead crews back to the home terminal to eliminate stays away from home of two or three days and then deadheading crews back to the away-from-home terminal to protect the next train. While this reduces the “crew start” of a day’s lodging at the away-from-home location, it dramatically increases costs: The crews get paid for deadheading, and the cost of transportation can easily eclipse the wages of the crew, depending on distance and mode of transport. With regard to the *Empire Builder* specifically, engineer layover times at Wenatchee and Pasco from Seattle and Portland respectively and train crew layover at Spokane from Shelby are especially problematic. In addition to the potential cost and work/life balance issues associated with rotations such as these, the ability to deadhead crews become safety issues during winter operation where traversing multiple mountain passes by highway can be considered hazardous. In the past, due to service interruptions or simply just late operations during winter, Amtrak has had to resort to flying (by charter) crews from the Shelby crew base to Minot due to poor or closed road conditions. Such trips run into the tens of thousands of dollars, and will only be more commonplace if deadheading becomes part of a regular crew rotation due to tri-weekly operation.

Excluding consideration for an undetermined amount of revenue loss for less-than-daily operation versus daily operation, it’s very likely that the increased cost of deadheading crews over multiple crew districts could actually exceed the cost of daily operation. As indicated above, if no deadheading is part of the tri-weekly crew rotation plan, it is interesting to note that while the number of trains per week is reduced by 57%, the actual savings in crew starts falls

way short. In other words, the fewer the days of operation, the less efficient the crew rotation. And, if Amtrak would consider even running the train(s) four-days-per-week instead of three, crew layover times would be cut significantly (and never be over the current layover time plus 48 hours).

**On Board Service** crews work the entire length of the run. For the Seattle section of the train, the personnel are based in Seattle; for the Portland section of the train, the personnel are based in Chicago. Those on the Seattle section would depart home terminal of Seattle Monday, Wednesday, and Saturday and arrive Chicago Wednesday, Friday and Monday. With daily operation, they spend the night and depart the following day after spending 22 hours, 20 minutes in Chicago. Under tri-weekly scenario:

The crew arriving Chicago Wednesday goes out the next day, laying over 22 hours, 20 minutes.

*The crew arriving Chicago Friday goes out Sunday, laying over 46 hours, 20 minutes.*

The crew arriving Chicago Monday goes out Tuesday, laying over 22 hours, 20 minutes.

Those on the Portland section would depart the home terminal of Chicago Sunday, Tuesday, and Thursday and arrive Portland Tuesday, Thursday, and Saturday. With daily operation, they spend the night and depart the following day after spending 30 hours, 35 minutes in Portland.

Under tri-weekly scenario:

The crew arriving Portland Tuesday goes out Wednesday, laying over 30 hours, 35 minutes.

*The crew arriving Portland Thursday goes out Saturday, laying over 54 hours, 35 minutes.*

*The crew arriving Portland Saturday goes out Monday, laying over 54 hours, 35 minutes.*

On Board service crews work for an entire round trip. The Tri-Weekly scenario actually provides relatively little additional layover time at endpoints (1 night in Chicago for the Seattle crews, and 2 nights in Portland for the Chicago crews). How Amtrak pays these people relative to train and engine crews and whether the tri-weekly operation would affect the cost is unknown and depends on how jobs are bulletined, but regardless, this would likely achieve a modicum of savings with regard to wages.

## **Equipment:**

Currently, Amtrak uses five train sets to operate the *Empire Builder*. With the tri-weekly schedule as indicated above, the rotation can be protected with three sets of equipment versus five, or a 40% reduction in equipment versus a 57% reduction in frequency.

One good point about the proposed tri-weekly operation is that there is no same-day turnaround of equipment in Seattle and Portland as is the case with daily operation now. This would in theory improve on-time performance when the westward trains are late into the destination terminals. In some cases, equipment lays over at the west end of run more than two days.

## **Stations and other facilities and staffing:**

The primary reason Amtrak long-distance trains are expensive to operate is they require much infrastructure for one train per day or less – no economy of scale. Reducing the frequency of long-distance trains will not reduce the need to maintain this infrastructure nor the people who make it go. All stations will remain intact with employees or caretakers being paid.



Amtrak does have the “opportunity” to eliminate Customer Service Representative positions with the Tri-Weekly operation. Wherever there are two shifts (one for the westward train and one for the eastward), the relief job can be eliminated leaving just two 5-day-per-week positions, each encompassing the three days per week that the train on that shift operates. Examples are Whitefish, Minot, and St. Paul. Fargo is a single-shift anomaly where both the eastward and westward trains arrive on the same days, so staffing could be accomplished with one five-day-per-week shift. But for most staffed stations - such as Milwaukee, La Crosse, Williston, Spokane, and Pasco – staffing would have to remain the same because trains – even tri-weekly ones – arrive over the course of more than five days, requiring a second position to the five-day-per-week position.

Station personnel is a good example how reducing train frequency does not always reduce staffing. Beyond that, it is yet unknown if Amtrak will reduce staffing at all, but its news release to employees suggests that cuts will be made. The question from RPA and others should be how Amtrak plans to reinstate laid off staff or hire new staff (if necessary) when service is to return to daily. Given Amtrak’s scarce resources in its management team, there is one school of thought that Amtrak may simply take the easiest course: Simply continue the trains on a less-than-daily basis, even if a cure or vaccine is found to rectify the pandemic situation. This would be the death knell for Amtrak long-distance trains as the recurring loss of revenue will make the losses per train (by Amtrak’s method of accounting) skyrocket.

The *Empire Builder* is inspected (as required by law) at Minot and Spokane. Same questions apply here: Will staff be reduced, and if so, will it be reinstated for resumption of daily service?

How will Amtrak handle staffing at commissaries in Chicago and Seattle (and other locations)? How will staffing be affected at locations where multiple less-than-daily trains converge and potentially connect? Will Amtrak attempt to maximize connections to retain revenue generated or minimize connections to reduce misconnecting passengers and staffing? Example: If the *Lake Shore Limited*, *Capitol Limited*, *Cardinal*, and *City of New Orleans* ALL arrive in Chicago on the same days and also on those same days the *Empire Builder*, *California Zephyr*, *Southwest Chief*, and *Texas Eagle* depart, any connecting business should be retained. But there is a huge cost in misconnects (no next train for two or three days) and staffing (basically the staffing currently in place despite that every other day the staff has nothing to do because long distance trains are not running). OR will Amtrak elect to have half its long-distance trains arrive at the Chicago hub every other day so that staffing (ticketing, baggage handling, commissary employees, equipment maintenance) can be reduced to bare minimum?

In summary, RPA needs to demand that Amtrak have oversight with regard to its COVID-19 service reductions, especially given the stated desires by the previous Amtrak administration and current White House administration that long-distance trains should be eliminated. These wholesale reductions in frequency cannot be a shortcut to eliminate these services. We must be cognizant of ALL costs associated with passenger train operations and identify those which will be minimally changed regardless of service frequency. Amtrak must be more transparent. And one last thing to consider with regard to running almost all long-distance trains less-than-daily: This is creating a very complex situation operationally for all Amtrak assets, from people to

locomotives to rolling stock. As someone who has managed train crews, locomotives and their required maintenance issues, and railroad cars for nearly 40 years on a Class I railroad, I can attest to a huge but largely unquantified cost: The manpower to manage a network with fewer connections and fewer options. Operating three-sevenths of the number of trains in a week does not require three-sevenths of the oversight and planning to effectively manage them and their associated assets. Often (and in this case), it is more time-consuming.

Beyond the obvious downsides to running Amtrak long-distance trains less-than-daily, RPA needs to get the word out about the costs of NOT operating the trains daily - and how, when all aspects of the operation are considered – Amtrak will not end up saving a sufficient amount of money to make the whole exercise worthwhile. (And yes, I have considered this to be a ploy by Amtrak to receive the additional funding as to not need to implement such a Draconian plan.)

Thank you for your time.

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