



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

February 9, 2024

Mr. Phillip Eng
General Manager
Massachusetts Bay Transportation Authority
10 Park Plaza
Boston, MA 02116

Subject: Response to Closeout Request for FTA-TRA-22-007 (Maintenance-of-Way Reporting to Executive Leadership)

Dear Mr. Eng:

On December 21, 2023, the Massachusetts Bay Transportation Authority (MBTA) submitted a Corrective Action Plan (CAP) closeout request for FTA-TRA-22-007 (Maintenance-of-Way Reporting to Executive Leadership). The MBTA developed this CAP as part of its response to interim findings issued in Special Directive (SD) 22-4: Track Maintenance from the Safety Management Inspection (SMI) initiated by the Federal Transit Administration (FTA) in April 2022.

Closeout Approval for FTA-TRA-22-007 (Maintenance-of-Way Reporting to Executive Leadership)

MBTA's CAP for FTA-TRA-22-007 includes seven action items, approved by FTA on August 10, 2022, to address the following SD 22-4 finding and required action:

- **Finding 7:** MBTA's Maintenance-of-way (MOW) department is not providing prioritized and actionable information to Executive Leadership regarding the condition of MBTA's assets and infrastructure.
- **Required Action (FTA-TRA-22-007):** MBTA must develop and implement a process and reporting procedure that accurately communicates the number, severity, and significance of MOW defects to Executive Leadership.

To implement this CAP, between August 10, 2022, and December 21, 2023, MBTA undertook the following CAP action items and submitted documentation regarding their completion:

- developed leading track condition key performance indicators (KPIs);
- developed a process for collecting track condition data and ensuring transparency;

- created transparent reporting, including a publicly-available Speed Restriction Report dashboard;
- integrated track condition data into the maintenance planning process;
- formalized the track condition reporting and data validation process;
- established and executed weekly distribution of data dashboards to Executive Leadership; and
- completed CAP verification.

FTA carefully evaluated the submitted documentation and reviewed submissions with MBTA during biweekly meetings on SD 22-4 between August 2022 and December 2023. FTA's verification focused on:

- reviewing MBTA's Engineering & Maintenance (E&M) Working Group progress on and approach to evaluating the current state of track condition data sources, dashboards, and metrics and improved communication with Executive Leadership;
- reviewing MBTA's analysis of its track condition data pipeline;
- reviewing MBTA's approach for and progress towards creating a comprehensive Track Defects Dashboard;
- confirming MBTA's improved track condition data accuracy and process improvement through the Track Defects Dashboard and Track Condition Report;
- confirming the new procedure for collecting and distributing the data has been implemented across the Authority and verified by Quality Management;
- confirming communication of the Track Condition Report to Executive Leadership; and
- confirming internal MBTA verification of the CAP.

Based on review of these submissions and the results of verification activity, FTA finds that these completed action items satisfy the requirements of CAP FTA-TRA-22-007 and this CAP may now be closed.


FTA will monitor MBTA's continued activity to provide this critical data to MBTA leadership through weekly submissions of the Track Conditions Report under FTA-TRA-22-008 (Special Maintenance Repair Plan).

Prior to closing SD 22-4, FTA will conduct final verification regarding MBTA's implementation of the updated procedure for reporting track conditions to Executive Leadership.

Conclusion

This CAP closure represents a tremendous amount of work, and FTA greatly appreciates your efforts. Please contact our SMI Coordinator, Christian Hernandez, by phone at (213) 552-3494 or by email at Christian.Hernandez@dot.gov with any questions.

Sincerely,



Joe DeLorenzo
Associate Administrator and
Chief Safety Officer
Office of Transit Safety and Oversight

cc: Peter Butler, Regional Administrator, FTA Region 1
Ryan Coholan, Chief Operating Officer, MBTA
Doug Connett, Chief of Infrastructure, MBTA
Tim Lesniak, Chief Safety Officer, MBTA
Meredith Sandberg, Chief of Quality, Compliance, and Oversight, MBTA
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Jamie Van Nostrand, Chair, Massachusetts Department of Public Utilities (DPU)
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