



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

December 3, 2024

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

Subject: Response to Closeout Request for FTA-VSC-22-002 (Training on Movement of Rail Vehicles with Known or Suspected Brake or Propulsion Defects)

Dear Mr. Eng:

On April 5, 2024, the Massachusetts Bay Transportation Authority (MBTA) submitted a Corrective Action Plan (CAP) closeout request for FTA-VSC-22-002 (Training on Movement of Rail Vehicles with Known or Suspected Brake or Propulsion Defects). The MBTA developed this CAP as part of its response to findings issued in Special Directive (SD) 22-5: Vehicle Securement from the Safety Management Inspection (SMI) initiated by the Federal Transit Administration (FTA) in April 2022.

Closeout Approval for FTA-VSC-22-002 (Training on Movement of Rail Vehicles with Known or Suspected Brake or Propulsion Defects)

MBTA's CAP for **FTA-VSC-22-002** includes 13 action items, approved by FTA on August 26, 2022, to address the following SD 22-5 finding and required action:

- **Finding 1:** MBTA does not adequately train personnel on the policies and procedures to safely move and secure rail cars with known or suspected defective brakes or propulsion equipment.
- **Required Action (FTA-VSC-22-002):** MBTA must develop training and train personnel on the policies and procedures to safely move rail vehicles with known or suspected defective brakes or propulsion equipment. Personnel is inclusive of all employees, contractors, oversight, or other individuals who access the rail system and facilities.

To implement this CAP, between July 25, 2022¹, and April 5, 2024, MBTA undertook the following actions and submitted documentation regarding their completion:

¹ MBTA provided documentation of actions the agency took prior to FTA's approval of the CAP that demonstrated the agency's work to address the finding and required action.

- Issued Special Orders (SO):
 - SO 22-148, Directive for Uncoupling Procedures for all Heavy Rail Trains and Vehicles.
 - SO 22-150, Rule Reminder for LR57 Positive Coupling;
 - SO 22-154, Procedure for Light Rail Vehicle Pre-trip Inspections;
 - SO 23-213, Procedure for all Heavy Rail Vehicle Yard Moves and Moving Heavy Rail Vehicles into and out of Car Houses with Blue Flag Protection HR 95 Rule Addendum;
 - SO 23-214, LR74 Moving Light Rail Vehicles into and out of the Carhouse & LR75 Blue Flag Protection for all Carhouse Tracks Rule Addendum;
 - SO 23-153, Procedure for Heavy Rail Vehicle Pre-trip Inspections,
- Issued a manual on the safe movement of rail vehicles in a yard and into/out of carhouses and a procedure for using blue flag/blue signal while inspecting, testing, repairing, and servicing rail transit vehicles; and
- Developed and implemented training on the policies and procedures for safely moving rail vehicles with known or suspected defective brakes or propulsion equipment.

FTA carefully evaluated the submitted documentation and reviewed submissions with MBTA during bi-weekly meetings between August 2022 and November 2024. FTA's review focused on:

- The content and issuance of the listed SOs, manual, and procedure and the incorporation of the SOs created before the publication of the updated Rules for Operations Employees, dated August 2023; and
- The creation and provision of training as listed above.
- FTA also conducted onsite verification activities from August 2022 to October 2024 at carhouses across the MBTA to verify compliance with the SOs, manual, and training.

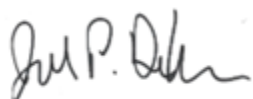
Based on review of these submissions and the results of verification activity, FTA finds that these actions adequately satisfy the requirements of CAP FTA-VSC-22-002 and this CAP may now be closed.

Prior to closing SD 22-5, FTA may conduct a final verification of MBTA's actions to address FTA-VSC-22-002.

Conclusion

This CAP closure represents a tremendous amount of work and FTA greatly appreciates your efforts. Please contact our Safety Management Inspection Coordinator, Christian Hernandez, at christian.hernandez@dot.gov or (213) 552-3494.

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
Tim Lesniak, Chief Safety Officer, MBTA
Meredith Sandberg, Chief of Quality, Compliance, and Oversight, MBTA
Pat Lavin, Chief Safety Officer, Massachusetts Department of Transportation
Jamie Van Nostrand, Chair, Massachusetts Department of Public Utilities (DPU)
Robert Hanson, Rail Safety Director, DPU