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February 13, 2019

Mr. Paul Wiedefeld

General Manager

Washington Metropolitan Area Transit Authority

600 Fifth Street, NW

Washington, D.C. 20001

Dear Mr. Wiedefeld,

Please accept this letter on behalf of the Washington Suburban Transit Commission (WSTC) in support of the continuance of the Washington Metropolitan Area Transit Authority's (WMATA) Metrorail system's current service hours of operation, as established in WMATA Board of Directors Resolution 2016-52, amended in Board Resolution 2017-26, and reauthorized via Board Resolution 2018-18. The WSTC is a seven-member bi-county commission created by in 1965 by an act of the Maryland General Assembly. The Commission serves as the liaison between WMATA and the State of Maryland, and coordinates with the transportation departments of Montgomery and Prince George's counties (the Washington Suburban Transit District). Four of the WSTC's seven members serve as the Maryland members of the WMATA Board of Directors.

The reduction in late-night rail and implementation of supplemental late-night bus service was implemented in order to provide WMATA the additional track hours required to initiate a long-term preventative maintenance strategy. While late-night rail hours of operation were cut back, the system remains open until 1:00 AM on weekends and 11:30 PM on weekdays. This is not dissimilar to other major cities that operate a two-track heavy rail system.

At a time when the rail system was under close scrutiny for safety concerns, including a significant number of Federal Transit Administration (FTA) and National Transportation Safety Board (NTSB) corrective action plans (CAPs), the reduction in service hours provided WMATA roadway maintenance crews with additional working hours necessary to make progress toward resolving these issues. The resultant progress is quantifiable: track incidents are down 86 percent (1<sup>st</sup> quarter FY2019 vs. 1<sup>st</sup> quarter FY2017), track fires have been reduced by 20 percent, and passenger offloading at less than half of the monthly target. At the same time, on-time rail performance achieved a system high of 90 percent on-time in January 2019 and customer satisfaction continues to improve.

More importantly, over the last three years, WMATA has been able to successfully close 158 FTA and NTSB CAPs, with an additional 69 CAPs completed and pending FTA or NTSB approval. This progress could be put in jeopardy if the current service hours under Board Resolution 2018-18 were to expire and revert to the original, pre-2016 Resolution schedule (closing at midnight Sunday through Thursday and 3:00 AM on weekends). In a January 2019 letter, the FTA has stated that a number of closed CAPs were certified on the assumption of a specific level of maintenance hours as per the current schedule. A change in WMATA's rail system service hours, resulting in fewer maintenance hours, would prompt the FTA to revisit its closed findings on a number of closed CAPs as well as potentially disqualify additional pending CAPs. In addition, the FTA letter states that, as a result of this change, it would need to redirect internal resources to provide additional safety oversight to WMATA's rail system; resources that are currently tasked with the final certification of the Washington Metrorail Safety Commission (WMSC) by the federally-mandated April 15, 2019 deadline.

**Failure to meet this FTA timeline could result in significant financial losses; not just for WMATA, but for the entire region due to restriction of federal grant funding tied to the successful transfer of oversight responsibilities from FTA to WMSC.** Specifically, in Maryland, Purple Line construction would be delayed if federal funds are lost, and Montgomery County's Ride-On, Prince George's County's The Bus, and MDOT MTA's MARC services would also be adversely impacted by the loss or delay in receiving federal funds.

A return to pre-2016 hours of service would also create an additional hole in WMATA's FY2020 budget. WMATA's General Manager has projected that almost \$45 million more would be needed from area jurisdictions to counter lost revenues caused by the mid-day track maintenance needed to replace the lost overnight track work and the extra expense of late-night operations. All to accommodate the small number of additional riders projected to use these late-night trains. That's on top of the \$82 million subsidy increase over FY2019 already requested by the General Manager.

WMATA's plan to *Keep Metro Safe, Reliable, and Affordable* should remain true to itself and begin with "safe." The Washington Suburban Transit Commission supports the Authority in its efforts to restore the system to a state of good repair and operation in order to protect its investment and, more importantly, its riders. Great progress has been made but there is still much to do in terms of rail system safety. For now, let us continue to make safety our top priority.

Mr. Paul Wiedefeld  
Page 3

Sincerely,



Clarence Crawford  
Chair, WSTC



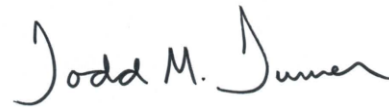
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Commissioner, WSTC  
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Maryland Transportation Secretary