

National Transportation Safety Board

Office of Railroad, Pipeline and Hazardous Materials

Washington, DC 20594



RRD22LR008

OPERATIONS

Group Chair's Factual Report

October 18, 2022

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A. ACCIDENT

Type: MBTA Passenger Fatality
Date and Time: April 10, 2022, at 12:30 a.m. EDT
Location: Boston, Massachusetts
Carrier: MBTA
Train: Red line No. 1034

B. OPERATIONS GROUP

Group Chair / IIC Zach Zagata
NTSB Office of Railroad, Pipeline and Hazardous Materials

Party Coordinator Ronald Ester
Massachusetts Bay Transportation Authority

Party Coordinator Ivana Limlengco
Massachusetts Department of Public Utilities

Party Coordinator George Good
Federal Transit Administration

Party Coordinator Roudy Jean
The Boston Carmen's Union

C. SUMMARY

On April 10, 2022, at about 12:30 a.m. local time, a Massachusetts Bay Transportation Authority (MBTA) passenger was fatally injured after a train door closed on their upper arm/shoulder at the Red Line Broadway Station in Boston, Massachusetts. A review of surveillance video indicated that, as the train was departing the station, the passenger attempted to exit the train through the closing doors. The passenger was able to create enough space to get most of their body outside the train, however, their right arm remained trapped by the door. As a result, the passenger was pulled down the platform onto the right of way.

D. DETAILS OF THE INVESTIGATION

Massachusetts Bay Transportation Authority

The MBTA, more commonly known as the T, is one of the oldest public transit systems in the United States. It's also the largest transit system in Massachusetts. As a division of the Massachusetts Department of Transportation (MassDOT), the MBTA provides subway, bus, commuter rail, ferry, and paratransit service to eastern Massachusetts and parts of Rhode Island. The subway lines consist of the Red, Orange, Blue, and Green lines. They provide connections to and from Boston and surrounding cities, including Cambridge, Newton, Revere, and Quincy.



Figure 1: Map of MBTA transit and bus map.

INTERVIEWS CONDUCTED ON-SCENE

A summary of the interviews is provided below. Please see the docket for a complete transcript of the interviews.

1) MBTA Operator, MBTA

The interview was conducted at the MBTA office located at 10 Park Plaza in Boston, Massachusetts on Monday, April 11, 2022. The operator started working for

MBTA in 2018. The trip on which the incident occurred was her last of the shift. She started at Ashmont Station on the Red Line. During the trip, she went northbound to Harvard Station, which was the northernmost point of the Red Line, due to a diversion in place between Alewife and Harvard Station over the weekend (April 9 & 10th).

During the interview, she provided an overview of her day leading up to event, including the arrival and departure at the Broadway Station. The operator stated the train dumped approximately 25 feet outside the northbound Broadway Station after departing the station. When asked what it means when a train is dumped, she said the train lost air pressure and it takes a while to rebuild air pressure before being able to move the train.

She told investigators she successfully recharged the air and proceeded from Broadway Station northbound to South Station where she was held for two minutes by Operation Control Center (OCC) for a schedule adjustment. The operator then proceeded to the Downtown Crossing Station, where OCC instructed the train to standby and was instructed by OCC to unload the train and she was relieved. After speaking with an Official, she learned there was a fatality at Broadway station. Following the incident, she was sent to the MBTA clinic for post incident testing. The train was impounded and sent light (empty) to Cabot Carhouse.

2) Heavy Rail Instructor, MBTA

The interview was conducted at the MBTA office located at 10 Park Plaza in Boston, Massachusetts on Tuesday, April 12, 2022. The interviewee was not involved in the incident and was interviewed to gain a better understanding of the operations and training provided. The instructor started working for MBTA on June 9, 2008.

The instructor provided an overview of the arrival and departure procedures. During the discussions, the instructor further discussed how a new operator is trained on the procedure for entering a station. He stated that, when entering a station, operators are trained to operate at a speed at which they can maintain control of the train. The instructor told investigators that operators are taught how to stop the train when properly berthed at the 6-car marker. While berthing the train, operators are able to utilize platform mirrors, Single person train operation (SPTO) cameras, and line of sight out of the cab window to determine when the platform is clear and when it is safe move the train to the next station. He told investigators that, after making the determination, the operator closes the doors with controls located in the operating cab and all six pilot lights must be extinguished before they pull their head back into the cab of the train. The instructor stated that if the train dumps, the operator can build up the air pressure which can take 90-120 seconds and then proceed. He said operators are supposed to notify OCC over the radio that the train loses its air so OCC can log it.

3) Senior Operator, MBTA

The interview was conducted at the MBTA office located at 10 Park Plaza in Boston, Massachusetts on Tuesday, April 12, 2022. The interviewee was not involved in the incident and was interviewed to gain a better understanding of the operations.

The senior operator started working for MBTA as a bus driver approximately 23 years ago. In that time, he has worked as both a train attendant, and an operator.

He provided an overview of the arrival and departure procedures that was consistent with the one that the trainer had discussed. During the interview, he described a similar experience when an intoxicated passenger got their bag stuck in the door at the Broadway Station approximately 3 to 5 years ago. He told investigators that during his similar event, the pilot lights all extinguished, and the automatic door starting signal rang. He stated that shortly after proceeding out of station a passenger notified him of the incident with the emergency intercom. He was able to quickly stop the train. The operator felt that the majority of SPTO cameras are dirty, broken, and damaged from environmental factors. He said that the video is delayed by a number of seconds, and they have blind spots. The senior operator told investigators that the sensitive edges on the train doors don't always work. He stated that the issues have been discussed with the union and MBTA management, however, he felt little action has been taken. When asked what the number was to report unsafe conditions, he stated he was unsure.

Security Camera Footage

Video Surveillance was viewed at MBTA Transit Police headquarters. The video showed the incident train pulling into the northbound platform at Broadway Station at 12:29am. After the Red line train berthed, the operator is seen sticking their head out of the crew cab window and the doors on the train open. During this time the pilot lights were illuminated, however, investigators could not see the pilot light on the second car. A number of passengers were seen exiting the car and approximately 3 or 4 passengers were observed entering the train cars. Shortly later the doors closed, and operator pulled their head back into the crew cab with the pilot lights still illuminated. Just prior to the lights extinguishing, a leg with a black shoe is seen exiting a train door, then a passenger's body came into on the platform with an arm still remaining inside the train. As the train departed the station, the passenger was observed running alongside the train with their arm pinched in the doorway. During this time the pilot light on the door was not illuminated. As the train departed the station, another passenger on the platform was observed running next to the passenger and attempting to pull the other passenger from the doorway. The security video indicated that, the passenger fell at the end of the platform and landed between the subway wall and the train. Following the accident, the train end cab

lights were seen illuminated as the train stopped approximately 50-80 feet outside of the station.

Sight Distance/ Partial Reenactment

On April 12, 2022, the investigative team traveled on an exemplar Red line train (same 1500 Series) from JFK to Broadway station to conduct a reenactment/sight distance analysis. MBTA Transit Police cleared and closed the station to prevent observations. During the sight distance analysis/ partial reenactment, investigators conducted line-of-sight observations from the operator's cab window to recreate the view of operator at the platform during a station stop. A member of the investigative team stood with their foot out of the car door and reenacted the passenger's positioning as they exited the E doorway. An investigative team member wearing black shoes placed their foot just beyond the entrance of the E doorway on the yellow strip. It was approximately 105 feet from the operator's cab window to the E doorway. The line of sight from the operator's cab window to the E doorway was not obstructed and the door involved was not on a curve. During the site distance test, another investigator walked 19 feet away towards the rear of the train before they came into view on the SPTO monitor, therefore, revealing a 19-foot blind spot. As a result, of the testing it was determined that the SPTO monitor did not capture the passenger exiting the train at the E doorway.

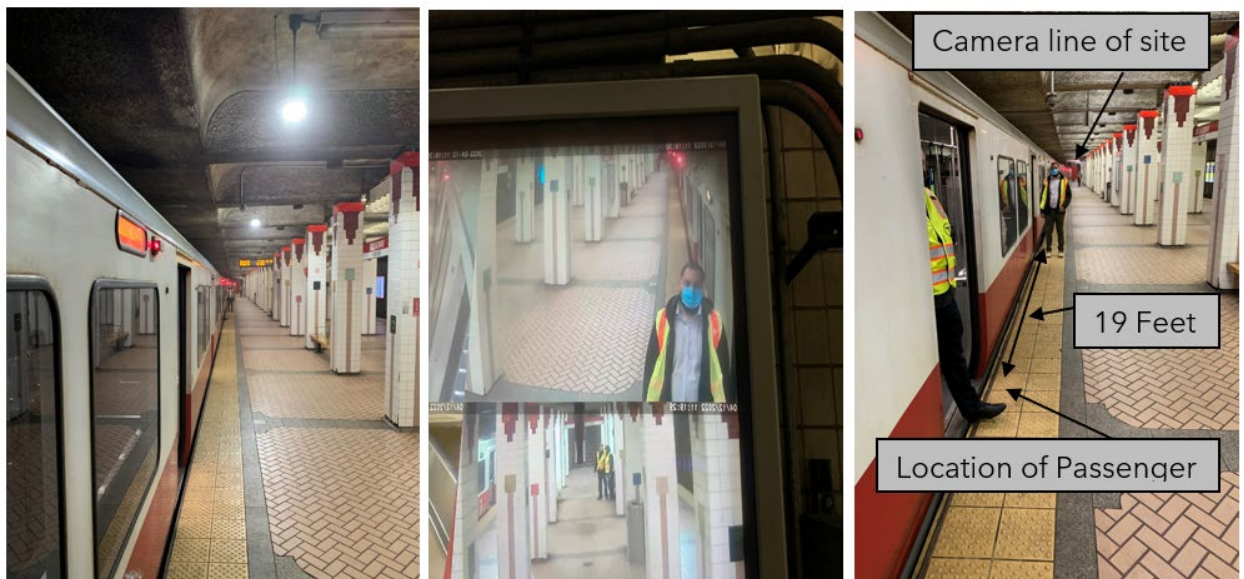


Figure 2: Photos taken during the site distance test conducted at the Broadway station. Note: The photo on the left depicts the view from the operators cab with train stopped at the 6-car spot. The photo in middle shows the images displayed on the SPTO monitor. The image on the right shows the blind spot identified.

Applicable Rules

MBTA Rules for Operations Employees

HR17 - Operation of Doors

G. Single person train operation (SPTO) door operating procedures:

- 1. Motorpersons must know the number of cars in his/her train-consist and the markers that aid in safe door operations.*
- 2. All door marker observations must be made from a standing position by leaning out beyond the side of the car.*
- 3. At no time shall the doors be operated while in the seated position.*

Note: The Motorperson shall rotate the Motorperson's seat out of the way if the positioning of the seat is a hindrance to standing.

- 4. As soon as the Motorperson stops at the designated car marker and knows by careful observation that the train doors are fully in the station by checking the green rear car marker, the doors in his/her charge should be opened.*
- 5. Should the Motorperson observe that the doors of the train are not safely positioned on the station platform, he/she must not open any doors of the train. Public address (PA) announcements will be made to the customers, informing them that the train must be moved into the station before the doors will be opened. Once the train doors are safely positioned on the station platform or properly guarded, the doors may be opened.*
- 6. When any part of the train overshoots the station, the Motorperson will immediately notify the OCC Dispatcher and follow HR11- Backing Trains at Stations. If Supervisory Personnel or a competent employee is available, he/she will ensure that the Right of Way (ROW) behind the train is clear and signal the Motorperson by either ringing three (3) bells from the rear cab or by swinging the hand or flashlight in a circle over the head.*
- 7. After receiving the proper signal, the Motorperson will sound three (3) blasts of the horn/whistle to warn anyone that the train is about to be backed up. He/she must also make two (2) public address (PA) announcements for affected customers.*
- 8. A Motorperson will be watchful to know that car doors open properly by observing that the door pilot lights are lit at every station and if for any reasons*

any door does not open, customers must be given ample opportunity to leave through another door.

9. A Motorperson must be aware of cars with a half door leaf cut-out and allow extra time for all customers to board/alight. Motorpersons must be especially cognizant in this situation of customers with disabilities on the vehicle or platform who may be particularly impacted by cut-out door leaves—e.g., cut-out door leaves will entirely prevent customers who use a wheeled mobility device from boarding/alighting the train at affected doors.

10. The Motorperson must take extreme caution not to close the doors on customers with apparent disabilities, including customers who are blind or have low vision or who use a wheeled mobility device, in case these customers require additional time or assistance to board/alight the vehicle.

11. A Motorperson should know by careful observation that no person is entering or leaving a car by any door, before closing it. Observations must be made from a standing position by leaning out beyond the side of the car to see that no one is in a position to be struck by closing doors.

12. A Motorperson must keep their hand on the door operating toggle or cover the open button, ready to instantly reverse the doors, if necessary.

13. Motorpersons must never rely on sensitive door edges or door sensing devices to protect our customers.

14. After closing the doors of the train in the prescribed manner, the Motorperson must ensure that the toggles are in the fully closed position.

15. The Motorperson must remain standing at their duty positions until all doors are closed, all pilot lights are extinguished and all customers are clear of the doors. Should the train move before it is safe to, the Motorperson must immediately stop the train.

16. Once all doors on a train are closed, they must not be re-opened except when a train is held at a station. Supervisory personnel may order the doors re-opened after personally notifying the Motorperson what is to be done. After the doors are re-opened, the proper automatic starting signal/door closed indicator light must be re-checked by the Motorperson.

17. Train doors must not be closed from station platforms except when the train is going out of service and into yard/storage areas. In all cases, employees must be alert to prevent the operation of doors at any point by unauthorized persons.

18. The Motorperson is the only person allowed to operate the doors of that train. The exception to this rule is when the train becomes disabled or when supervisory personnel are assigned to that train in the performance of his/her duties.

19. Station/platform personnel assigned to a station platform for the assistance of door closure will be easily identified by their required personal protection equipment (PPE). Platform personnel will give the proper flashlight signals (listed below) to the Motorperson.

(a) Up and down - close the doors.

(b) To and fro (across the body) - leave train doors open or if in the act of closing the doors, re-open and wait for a close signal.

(c) Circle above the head - right of way (ROW) behind the train is clear to back up.

HR18 - VIDEO MONITORS, CAMERAS & MIRRORS

Note: In stations where view is impeded due to the curvature of a station platform or other obstruction, video monitors, cameras, and mirrors are installed to provide safe visibility for the operation of doors.

A. Video monitors provide a view of the platform to the Motorperson when the configuration of a station makes it difficult to observe customers boarding specific cars of a train from an obstructed area (i.e., stairway, concourse, etc.).

B. If a video monitor is not operational, immediately contact the OCC Dispatcher to request personnel to assist with the closing of train doors at the affected station. The train must not leave the station until a qualified employee can confirm visually obstructed threshold(s) free of any customers in lieu of the video monitor.

C. Motorpersons can only close the doors after he/she confirms the designated signal from a qualified employee assigned to assist with the closing of doors.

D. Any employee assigned to a station for a defective video monitor must not leave that location unless properly relieved or directed to do so by the OCC Dispatcher. The OCC Dispatcher will be required to contact the nearest station Official to check on the condition of this video monitor to ensure that this monitor has electrical power and that the unit is in the "on" position.

Note: Train Starters offices on each of the Heavy Rail lines have been provided keys to open video monitor enclosures, so that responding Officials can diagnose any issues associated with the monitors.

E. If a monitor cannot be restarted, the responding Officials must notify the MBTA Security Department at 617-222-6222 and provide the necessary details to repair video monitors. If any of the camera views on video monitors are not operating properly, this must also be reported.

F. Video cameras relay multiple angle views of the station platform to video monitors so as to assist the Motorperson with the safe closing of doors. If the video camera becomes misaligned at any time, supervisory personnel must contact the MBTA Security Department to request a camera re-alignment. If a camera can be realigned in the field, supervisory personnel must realign the camera.

G. In stations where single person train operation (SPTO) is in effect, mirrors have been installed as an additional means for the Motorperson to observe the doors. These mirrors are an aid only and in no way lessen the responsibility of proper door operation.

H. In the event that two-person train operation (TPTO) is in effect, mirrors have been installed to provide safe visibility for door operations when view is impeded due to station curvature. If the mirror is not operational, for whatever reason, the lead car Motorperson will assist the Motorperson assigned to door operations in order to close the doors. The OCC Dispatcher should be informed as to the problem so that corrective action may be taken.

I. If a mirror becomes misaligned at any time, an Official must realign the mirror using the alignment tool.

J. If a mirror becomes misaligned and cannot be adjusted, the Maintenance Control Center (MCC) and the OCC Dispatcher must be notified.

K. Motorpersons of first revenue service trains must check and ensure that all cameras and video monitors are turned on and working properly. Motorpersons must also check mirror alignment at each station when properly berthed. Any defects observed must be reported to the OCC dispatcher.

PERSONNEL INFORMATION

The operator was hired by MBTA on October 1, 2018.

A review of the operator's training records indicated that she completed her last re-instruction on November 8, 2021.

A review of the operator's discipline history indicated that the operator had been disciplined. On December 30, 2019, the operator received 3 days discipline for an incident that involved a door failure. On July 17, 2020, and December 24, 2020, the operator received written warnings for issues related to the MBTA attendance policy. The last disciplinary action was related to a failure to stop for a double red signal on October 17, 2021, and the operator received 10 days discipline.

A review of the operator's work history from 03/09/22 to 04/09/22 indicated that the operator had worked a total of 16 times in the 32 days prior to the accident, with 4 consecutive days prior to the accident.

Toxicology Testing

The Federal Transit Administration (FTA) drug and testing regulations require that safety sensitive employees involved in a public transportation vehicle accident involving the loss of human life submit tests for alcohol misuse and prohibited drug use as soon as practicable following the accident. Title 49 Code of Federal Regulations (CFR) Part 655 requires the testing of any other safety sensitive employee whose performance could have contributed to the accident, as determined by the employer at the scene using the best information available at the time of the decision.

In accordance with Title 49 CFR Part 655, post-accident toxicology testing for alcohol and other drugs was performed. The results were negative for all tested-for substances.

External Oversight

Federal Transit Administration

The FTA is required to implement and maintain a national public transportation safety program to monitor the safety of all public transportation systems that receive federal funding. The safety program includes:

- 1) The National Public Transportation Safety Plan, detailing safety performance criteria and minimum transit safety standards;
- 2) The Safety Certification Training Program, a safety training regime for personnel who conduct transit safety audits;
- 3) The Public Transportation Agency Safety Plan, a requirement for each transit agency to detail what it will do to ensure the safety of its system; and

4) The State Safety Oversight Program, which establishes independent state-based rail transit safety oversight agencies, with enforcement authority to compel the rail public transit agency to complete necessary safety actions.

Following the accident at Broadway Station, on April 13, 2022, FTA notified MBTA that FTA would be immediately assuming an increased safety oversight role of the MBTA system and FTA's Transit Safety Oversight (TSO) would be conducting a Safety Management Inspection (SMI) of transit operations and maintenance programs. The SMI also assessed the effectiveness and role played by the Massachusetts Department of Public Utilities (DPU).

To address interim findings and subsequent safety concerns uncovered during FTA's SMI, the FTA issued a series of special directives on June 15, 2022, to the MBTA and the DPU, the state agency responsible for safety oversight of the MBTA's rail transit operations.

Special Directive 22-4 mandated that MBTA take nine required actions in three distinct categories related to maintenance of way (MOW). These required actions addressed deficiencies in personal protective equipment (PPE) and right of way (ROW) safety; to correct defective track conditions; and to address management practices that negatively impact track repair.

Special Directive 22-5 mandated that MBTA undertake three required actions within its system to address the pattern of safety incidents and interim safety findings concerning unintended and uncontrolled train movements by disabled trains in maintenance facilities and rail yards.

Special Directive 22-6 mandated that MBTA take seven required actions within its system to address the pattern of safety incidents and interim safety findings related to actions within the Operations Control Center at MBTA.

Special Directive 22-7 mandated that MBTA undertake three required actions within its system to address the pattern of safety incidents and interim safety findings concerning lapsed training certifications of safety-sensitive rail personnel.

Special Directive 22-8 required the Massachusetts Department of Public Utilities (DPU) to oversee the implementation of the four Special Directives issued to the Massachusetts Bay Transportation Authority (MBTA) that addressed immediate safety issues based on interim findings made during FTA's ongoing Safety Management Inspection (SMI) of the MBTA. This Special Directive required the DPU to take actions to oversee MBTA's corrective actions to address the pattern of safety incidents and interim safety findings concerning deferred track maintenance, uncontrolled train

movements, management of the Operations Control Center, and lapsed training certifications of safety-sensitive rail personnel at the MBTA.

FTA issued the directives as part of its oversight role. FTA's Public Transportation Safety Program regulation lays out the agency's authority and process for overseeing and supporting transit safety, including issuing special directives. FTA may take enforcement action for any violation of this Special Directive or the terms of any written plan adopted pursuant to this Special Directive in accordance with FTA's authorities under 49 U.S.C. § 5329.

Massachusetts Department of Public Utilities - State Safety Oversight

Under FTA's State Safety Oversight Rule, the DPU was certified in 2018 as the State Safety Oversight Agency (SSO) charged with providing Federally required safety oversight of the MBTA rail transit system. The DPU's rail oversight team is the federally designated state safety oversight agency over the MBTA, designated by the FTA. The Transportation Oversight Division annually reviews, tests, and approves the Agency Safety Plan created by the MBTA, along with monitoring of the MBTA's compliance with the Division's System Safety Program Standard. The division also performs random inspections of MBTA light and heavy rail subway cars and operation facilities which include all carhouses. Division staff review and participate in internal safety audits to further enhance compliance and safety plans. The division also conducts external safety audits which are designed to monitor compliance with program requirements. The rail oversight team consisted of three compliance officers, one auditor, and three Public Utilities Engineers at the time of the event.

Internal Oversight

Safety Rules Compliance Program Manual

The purpose of the Safety Rules Compliance Program Manual (SRCPM) is to ensure safety-related operating and maintenance rules at the MBTA are monitored for compliance. It further seeks to promote safety culture ideals characterized in the MBTA Safety Plan and provide a resourceful catalogue of updated procedures and forms to MBTA personnel. The manual doubles as a guide for defining programs, performing inspections, handling forms, disciplinary protocol, and use of recordkeeping, rules & methods for unannounced operational testing, special instructions/orders/bulletins, training, and reporting.

The SRCPM aims to clarify, collaborate, and enhance the MBTA's Safety Rules Compliance Program (SRCP), which includes activities performed on, over, under, within or adjacent to property belonging to MBTA. These activities include but are not limited to; audits, inspections, tests, observations, coaching, reinstruction, revision of SOPs, recordkeeping, and practical drift identification.

The SRCP was established for the following reasons:

- To serve as reinforcement for established rules and procedures through coaching and mentoring employees in rules compliance.
- To establish a "baseline" of documentation that tracks an individual employee's compliance with operating rules absent of an accident investigation.
- Allows management, training staff and supervisory personnel to assess trends and incorporate this information into established training Programs.
- Allows an individual employee the opportunity for additional training/instruction if an issue with compliance is identified (before an accident/incident occurs).
- To develop and implement new audits based on need and analysis of trends.
- To establish a process for determining what type of audits and frequency of audits are conducted on a monthly, quarterly, yearly basis.

The operator was tested on the following elements within the SRCPM:

Element 14.1-Rules Compliance:

Rapid Transit Lines (RTL) Door Observation

Element/Characteristics and Method of Verification:

This observation verifies that train crews follow the rules and proper procedures for compliance with Subway Operations rules.

- *The Rules Compliance Staff stands in a platform location where you can observe all aspects of door operations and boarding procedures.*
- *In order to perform the test, the Rules Compliance Staff must have the required PPE and/or equipment needed to perform the RCP Observation at the scheduled starting time.*
- *Examples of PPE and/or equipment needed: testing compliance form; Fitness for Duty form; statement form; pen; working portable radio, etc.*

Testing and Observations:

The Rules Compliance Staff observes all aspects of door operations looking for the following violations:

- *Employee sitting and/or without his/her head out of the cab window when opening/closing doors*
- *Employee not confirming all pilot lights are lit when servicing the station and/or extinguish before departing the station*
- *Customer hit by the doors when boarding and alighting the train*
- *Test Rules Compliance Staff have no latitude in recording rules violations. What is observed is what is recorded.*
- *Written in ink, fully complete the form for the observation. Write data in neatly and do not abbreviate the vehicle's direction or the words Yes/ No in the Compliant columns.*
- *If any violation is observed, the employee must be re-instructed prior to leaving the station and checked for Fitness for Duty. If it is not possible to re-instruct and check the employee before train departs, notify the OCC Dispatcher to attempt to stop the train and have the nearest Supervisory Employee perform the task.*
- *If due to a violation a re-instruction statement or fitness for duty form is required by the Test Rules Compliance Staff or another employee (see above bullet), it must be attached to the RCP Observation Form when submitted to the Area's Supervisory Staff and/or Superintendent.*
- *Test Rules Compliance Staff must personally ensure that the original form is received by the Area's Supervisory Staff and/or Superintendent.*

- *If other rule violations are observed, the Test Rules Compliance Staff must immediately take action to stop or otherwise appropriately address the violation. The other violation should be documented and followed up on as required by rules and procedures. Do not document on this Inspection Form.*

- *Original forms are to be kept at the Area Superintendent's office.*

Comments/Corrective Action:

- *If any violation is observed, the employee must be re-instructed and checked for Fitness for Duty by Supervisory Personnel.*

From August 20, 2019, through February 11, 2022, the operator had been observed during testing on 38 occasions for compliance with Rules Compliance Procedure (RCP)-006. The operator had been found to comply all 38 times with the rules and procedures observed.

Passenger Emergency Intercom (PEI)

Element/Characteristics and Method of Verification:

This observation verifies that Heavy Rail Motorperson (s) and Light Rail Motorperson(s) follow the rules and proper procedures for compliance with Subway Operations and Light Rail Rulebooks and or Special Orders.

- *One Rules Compliance Staff will enter any passenger service area and activate the PEI.*

Testing and Observations:

The Rules Compliance Staff observes train operations looking for the following violation: - Motorperson responds timely and professional addressing the needs of the customer.

- *Test Rules Compliance Staff have no latitude in recording rules violations. What is observed is what is recorded.*

- *Written in ink, fully complete the form for the observation. Write data in neatly and do not abbreviate the words Yes/ No in the Compliant columns.*

- *If any violation is observed, the employee(s) must be re-instructed immediately and checked "fit for duty" before allowing the move to continue.*

- *Test Rules Compliance Staff must personally ensure that the original form is received by the Area's Supervisory Staff and/or Superintendent.*
- *If other rule violations are observed, the Rules Compliance Staff must immediately take action to stop or otherwise appropriately address the violation. The other violation should be documented and followed up on as required by rules and procedures. Do not document on this Inspection Form.*
- *Original forms are to be kept at the Area Superintendent's office.*

Comments/Corrective Action:

- *If the employee is observed not answering the PEI the employee must be re-instructed and checked for Fitness for Duty by Supervisory Personnel.*
- *If the PEI is non-functional the Rules Compliance Staff must immediately report the OCC Dispatcher and Superintendents Office.*
- *The car must be taken out of service if the PEI is non-functional.*

From August 15, 2019, through March 20, 2022, the operator had been observed during testing on 11 occasions. The operator had been found to comply all 11 times with the rules and procedures observed.

RTL Train Crews' Cab Observation

Element/Characteristics and Method of Verification:

This observation verifies that train crews follow the rules and proper procedures for compliance with Subway Operations rules.

- *The Rules Compliance Staff stands in a platform location (4/6 Car Marker/Rear Car Marker area) where you can observe the Motorperson's Cab for compliance with Subway Operations rules.*
- *In order to perform the test, the Rules Compliance Staff must have the required PPE and/or equipment needed to perform the RCP Observation at the scheduled starting time.*
- *Examples of PPE and/or equipment needed: testing compliance form; Fitness for Duty form; statement form; pen; working portable radio, etc.*

Testing and Observations:

The Rules Compliance Staff observes the Train Crews' Cab looking for the following violations: – Unauthorized Personnel in Cab – Unauthorized Reading Material in Cab –

Prohibited Electronic Devices in Cab – Handbrake not properly set when cab left unattended – Master controller/Cineston handle fouled

- *Test Rules Compliance Staff have no latitude in recording rules violations. What is observed is what is recorded.*
- *Written in ink, fully complete the form for the observation. Write data in neatly and do not abbreviate the vehicle's direction or the words Yes/ No in the Compliant columns.*
- *If any violation is observed, the employee must be re-instructed prior to leaving the station and checked for Fitness for Duty.*
- *If it is not possible to re-instruct and check the employee before train departs, notify the OCC Dispatcher to attempt to stop the train and have the nearest supervisory employee perform the task.*
- *If due to a violation a re-instruction statement or fitness for duty form is required by the Test Rules Compliance Staff or another employee (see above bullet), it must be attached to the RCP Observation Form when submitted to the Area's Supervisory Staff and/or Superintendent.*
- *Test Rules Compliance Staff must personally ensure that the original form is received by the Area's Supervisory Staff and/or Superintendent.*
- *If other rule violations are observed, the Test Rules Compliance Staff must immediately take action to stop or otherwise appropriately address the violation. The other violation should be documented and followed up on as required by rules and procedures. Do not document on this Inspection Form.*
- *Original forms are to be kept at the Area Superintendent's office.*

Comments/Corrective Action:

- *If any violation is observed, the employee must be re-instructed and checked for Fitness for Duty by Supervisory Personnel.*

From October 19, 2018, through November 24, 2022, the operator had been observed during testing on 8 occasions for compliance with RCP-008. The operator had been found to comply all 8 times with the rules and procedures observed.

Public Address Announcement (PA)

Element/Characteristics and Method of Verification:

This observation verifies that all Heavy Rail and Light Rail Motorpersons follow the rules and proper procedures for compliance with Subway Operations and Light Rail Rulebooks and or Special Orders.

- *One Rules Compliance Staff will enter any passenger service vehicle and listen for Public Address Announcements.*

Testing and Observations:

The Rules Compliance Staff observes train operations looking for the following violation:

- *Motorperson / Automation is making proper station announcements both departing and arriving at stations.*
- *Motorpersons are also announcing service interruptions (if applicable) and transfer points*

- *Test Rules Compliance Staff have no latitude in recording rules violations. What is observed is what is recorded.*
- *Written in ink, fully complete the form for the observation. Data must be neatly written with no abbreviate words in Yes/ No columns.*
- *If any violation is observed, the employee(s) must be re-instructed immediately and checked for Fitness for Duty.*
- *Test Rules Compliance Staff must personally ensure that the original form is received by the Area's Supervisory Staff and/or Superintendent.*
- *If other rule violations are observed, the Rules Compliance Staff must immediately take action to stop or otherwise appropriately address the violation. The other violation should be documented and followed up on as required by rules and procedures. Do not document on this Inspection Form.*
- *Original forms are to be kept at the Area Superintendent's office.*

Comments/Corrective Action:

- *If the employee is observed not making public address announcements the employee must be re-instructed and checked for Fitness for Duty by Supervisory Personnel.*
- *If the PA is non-functional, the Rules Compliance Staff must immediately report the OCC Dispatcher and Superintendent's Office.*
- *Manual announcements must be made anytime automated announcements are non-functional.*

From August 15, 2019, through January 28, 2022, the operator had been observed during testing on 11 occasions for compliance with RCP-032. The operator had been found to comply all 11 times with the rules and procedures observed.

Submitted by:

Zach Zagata
Operations Group Chair / IIC