



U.S. Department  
of Transportation

**Federal Transit  
Administration**

Headquarters

1200 New Jersey Avenue, SE  
Washington, DC 20590

**SENT VIA EMAIL**

April 25, 2024

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

**Subject: Response to Closeout Request for FTA-VSC-22-001 (Yard Movements 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-22-001 (Yard Movements 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: Track Maintenance from the Safety Management Inspection (SMI) initiated by the Federal Transit Administration (FTA) in April 2022.

**Closeout Approval for FTA-VSC-22-001 (Yard Movements of Rail Vehicles with Known or Suspected Brake or Propulsion Defects)**

MBTA's CAP for FTA-VSC-22-001, as approved by FTA on August 26, 2022, included 18 action items. A supplemental CAP, FTA-VSC-23-001, approved by FTA on May 5, 2023, addressed one FTA-VSC-22-001 action item and elements of another FTA-VSC-22-001 action item. As of the date of the May 5, 2023, supplemental CAP approval letter, MBTA's CAP for FTA-VSC-22-001 included 17 action items to address the following SD 22-5 finding and required action:

- **Finding 1:** MBTA does not have or use specific procedures for yard movements of rail vehicles with known or suspected defective brakes or propulsion equipment.
- **Required Action (FTA-VSC-22-001):** MBTA must develop and implement specific written procedures for yard movements of rail vehicles with known or suspected defective brakes or propulsion equipment.

To implement this CAP, between June 6, 2022<sup>1</sup>, and April 5, 2024, MBTA undertook the following actions (and submitted documentation regarding their completion):

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<sup>1</sup> 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.

- investigated incidents related to the finding and required action of this CAP;
- discussed MBTA expectations for moving vehicles based on vehicle condition with frontline workers;
- issued Safety Directive 22-03, Train Movement Into and Out of Maintenance Facilities, and Safety Directive 22-04, Train/Vehicle Uncoupling;
- 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, and developed training;
  - SO 22-154, Procedure for Light Rail Vehicle Pre-trip Inspections, and developed training;
  - 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, and developed training;
  - SO 23-214, LR74 Moving Light Rail Vehicles into and out of the Carhouse & LR75 Blue Flag Protection for all Carhouse Tracks Rule Addendum, and developed training;
  - SO 23-153, Procedure for Heavy Rail Vehicle Pre-trip Inspections, and developed training;
- created a pin hitch procedure and back-up procedures for yard coupling when pin hitching is not successful, including procuring necessary equipment, training workers, and executing vehicle modifications;
- created line-specific rerail checklists;
- created heavy rail and light rail forms: Safety Inspection/Carhouse Circle Check for Vehicle Movement in Yards and for Pre-trip Inspections;
- developed a labor model, budget, and hiring plan to support additional carhouse and yard workload; and
- updated the Rulebook to reflect requirements for movement within yard limits and into/out of carhouses.

FTA carefully evaluated the submitted documentation and reviewed submissions with MBTA during bi-weekly meetings on SD 22-5 between August 2022 and April 2024. FTA's review focused on:

- the content and issuance of the listed SOs and incorporation of the SOs created before the publication of the updated Rules for Operations Employees, dated August 2023;
- the creation and implementation of a pin hitch procedure and back-up procedures;
- the creation and provision of training as listed above; and
- the creation and implementation of checklists and forms as listed above.

FTA also conducted multiple on-site verifications to verify implementation of the items listed above. To complete this activity, FTA:

- confirmed distribution of, training on, and implementation of listed SOs; and
- reviewed Safety Inspection/Carhouse Circle Check for Vehicle Movement in Yards and Pre-Trip Inspection form records.

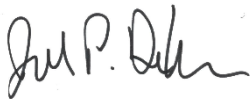
**Based on review of these submissions and the results of verification activity, FTA finds that these completed action items adequately satisfy the requirements of CAP FTA-VSC-22-001 and this CAP may now be closed.**

Prior to closing SD 22-5, FTA may conduct final verification MBTA's execution of the practices listed above.

### **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](mailto: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  
Natasha Vance, Deputy 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