U.S. Department of Transportation
Federal Transit Administration

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

April 24, 2025

Ms. Meredith Biggica
Deputy Secretary for Multimodal Transportation
Pennsylvania Department of Transportation
Keystone Building
400 North St., Fifth Floor
Harrisburg, PA 17120

Subject: Response to Closure Request for FTA-24-5-007-3 (Oversight of SEPTA Document Management, Management of Change, and Configuration Control Procedures)

Dear Ms. Biggica,

On March 4, 2025, the Pennsylvania Department of Transportation (PennDOT) submitted a request to close required action FTA-24-5-007-3, which is associated with Finding 7 of Special Directive 24-5: "PennDOT Must Do More to Require the Southeastern Pennsylvania Transportation Authority's (SEPTA) Rail Equipment Engineering and Maintenance Department (REE&M) to Control Safety-Critical Documents."

Required action FTA-24-5-007-3 requires PennDOT to direct SEPTA REE&M to complete and issue its revision to SEPTA's document management, management of change, and configuration control procedures and submit the revised procedures to FTA for review, approval, and implementation monitoring.

Response to Closure Request

While FTA appreciates PennDOT's efforts in requiring SEPTA to complete and issue the revised procedures, we are unable to close this required action at this time based on PennDOT's submissions. Our review of the submitted Configuration Change Management Standard (rev. 3, February 2025) and Rail Equipment Engineering (REE) Procedure for Initiating (and Revising) Engineering Change Notices (rev. 7, February 25, 2025) identified deficiencies in both documents that must be addressed before FTA can approve the documents and conduct implementation monitoring.

Actions Required to Address FTA-24-5-007-3 (Oversight of SEPTA Document Management, Management of Change, and Configuration Control Procedures)

To fully address FTA-24-5-007-3, PennDOT must ensure that SEPTA corrects the following deficiencies.

Specific to the Configuration Change Management Standard (the Standard):

- **Document Management**
  - **Review Cycle:** The Standard states a one-year review cycle but does not specify the start of the cycle/next review date (pg. 4). The revision history implies that no reviews were conducted between 2014 and 2025, an eleven-year gap.
  - **Management Approval (pg. 5):** The Standard includes a signature page for document approvals, but no signatures are present (pg. 5). Note that the version submitted to FTA by PennDOT was not a draft and was provided to FTA as completed.

- **Acronyms and Definitions**
  - **Missing Acronyms:** The Standard does not introduce all acronyms used in the document and some acronyms that are introduced in the document are not included in the acronyms section (pg. 6).
  - **Missing Definitions:** The definitions section does not include a definition for "Engineering Change Notice" (mentioned on pg. 7) and some acronyms introduced in the acronyms section are not included in the associated definitions section and vice versa (pg. 6-7).

- **Class Change System**
  - **Threshold for Class 2 Changes:** The Standard establishes clear criteria for Class 1 Changes and states that Class 2 Changes are all other changes that do not meet the criteria for a Class 1 Change (pg. 7). Section 5.1.2 specifies that these changes are documented per departmental protocols; however, there is no clear criteria as to what departmental changes elevate to a Class 2 change and require documentation per Section 5.1.2 (pg. 21).
  - **Clarity of Class Change Categories:** The purpose of the two class system is unclear in the Standard.

Specific to REE 3.0 (the SOP):

- **Review Cycle:** The procedure does not establish a document review cycle.

- **Rule References:** The SOP does not include a reference section and does not indicate how it correlates and complies with the Configuration Change Management Standard.

- **Safety Risk Management:** Section 2.3.13 states that a System Safety Officer serves on the Engineering Review Board to review Engineering Change Notices to identify potential hazards, determine whether a safety risk assessment is necessary, and, if so, conduct the safety risk assessment to establish safety risk ratings and mitigations (pg. 7). The SOP does not specify how the safety risk assessment will be conducted. Furthermore, the SOP does not indicate that an engineer with appropriate subject matter expertise will support the safety risk assessment.

- **Sufficiency:** The SOP does not cover all key processes involved in a comprehensive and detailed procedure for managing engineering changes from initiation though implementation and verification. As also demonstrated in the Section 11 (Appendix B) process flowchart, the SOP begins once the agency determines an Engineering Change Notice is necessary (pg. 19).

  The SOP and flowchart do not describe key activities that occur prior to developing an Engineering Change Notice, such as:
  - **Submitting engineering change requests,** that is, a process for initiating a request for a system change or modification including identification of the problem, scope, and criticality.
  - **Engineering review of the engineering change request,** that is, a process for reviewing the request to assess efficacy, feasibility, resource requirements, and associated safety concerns.
  - **Involvement of a Change Review Board,** that is, a process for reviewing the initial change request (not Engineering Change Notices) to determine merit for advancing the request.

  The SOP and Flow Chart also do not describe key activities that occur after developing an Engineering Change Notice, such as:
  - **Issuance of the Engineering Change Notice,** that is, a process for issuing a Notice, including design, testing, distribution, training, manual updates, and implementation.
  - **Monitoring and assessing the change,** that is, a process for establishing performance measures and practices to (1) verify the change is functioning as intended and (2) identify any unintended impacts of the change and, if either (1) or (2) are not satisfied, determine what must be done to revise or update the engineering change.

- **Consistency with Configuration Change Management Standard:** The SOP is inconsistent with the Standard on what constitutes as Class 1 Change. Section 5.1.1 of the Standard includes vehicle couplers, vehicle current collection devices, and infrastructure specific items as Class 1 changes (Standard pgs. 16-17), while Section 2.3.7 of the SOP does not include those items as Class 1 changes (SOP pgs. 4-5). Furthermore, Section 5.2 of the Standard covers practices for field modifications (Standard pg. 21), while the SOP does not include practices for field modifications.

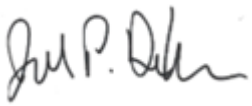
Conclusion

PennDOT must submit a revised Standard and SOP, supporting documents as relevant, and PennDOT's certification of its review of the same within 60 business days of the date of this letter. PennDOT must ensure that the Standard and SOP fully address these deficiencies. If SEPTA has addressed any of these deficiencies outside of the Standard and SOP, that must be formally documented, referenced in the Standard or SOP as relevant, and submitted for approval. Please ensure that this submission must include a detailed explanation of how each issue has been resolved.

If you have any questions, please contact Special Directive coordinator Syed Ahmed at (202) 603-6765 or syed.ahmed@dot.gov.

We appreciate your continued cooperation and commitment to safety oversight.

Sincerely,



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

cc: Elizabeth Bonini, Director, State Safety Oversight Office, PennDOT
J.M. McLaughlin, State Safety Oversight Regional Manager, PennDOT
Terry Garcia Crews, Regional Administrator, FTA Region 3
David Burns, General Engineer, FTA Region 3