



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

September 28, 2022

Mr. Steve Poftak
General Manager
Massachusetts Bay Transportation Authority
10 Park Plaza
Boston, MA 02116

Subject: Daily and Weekly Submittals for Special Directive 22-6

Dear Mr. Poftak,

Thank you and your team for complying with the Federal Transit Administration's (FTA) daily and weekly reporting requirements for Special Directive 22-6: Operations Control Center (OCC).

As required, the MBTA began submitting OCC staffing and certification reports regularly on Friday, June 24, 2022. Special Directive 22-6 required the MBTA to submit these reports for six (6) weeks, through Friday, August 5, 2022, and until FTA finds that the MBTA has satisfactorily demonstrated resolution of the issues tracked with these submittals. FTA's correspondence to MBTA on Wednesday, August 3, 2022 required MBTA to continue to submit these reports for Special Directive 22-6 through Friday, September 30, 2022.

This letter provides direction regarding the continuation of these requirements.

Reporting Requirements for Special Directive 22-6: OCC

FTA will continue to require MBTA to submit the weekly work schedules and training certification reports for OCC personnel and the daily "as performed" OCC work schedules through September 30. After that point, weekly work schedules and training certification reports for OCC personnel and the daily "as performed" OCC work schedules will no longer be required.

Instead, beginning November 5, the MBTA must submit a monthly report that identifies any OCC workers who worked out of certification, who exceeded the new hours of service requirements specified in Special order #22-116, or who worked dual dispatching and supervisory roles during the same shift.

These reports will be due on November 5, 2022 (for October 2022), December 5, 2022 (for November 2022), January 5, 2023 (for December 2022) and February 5, 2023 (for January 2023). During this period, FTA and the Massachusetts Department of Public Utilities (DPU) will continue to monitor OCC staffing, records, timecards, and implementation of OCC-SOP 103.0, Standard Operating Procedure for Managing the Limitation of Work Hours and Certification Compliance for OCC Dispatchers, which was adopted by the MBTA in response to Special Directive 22-6.

If the MBTA's monthly submittals continue to demonstrate compliance with certification and hours of service requirements and ensure distinct roles for dispatchers and supervisors during shifts, then FTA may end reporting requirements for Special Directive 22-6 with the monthly report submitted on February 5, 2023. FTA will provide further direction on reporting requirements prior to January 31, 2023.

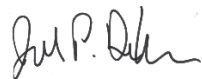
FTA will continue to monitor the OCC's compliance with certifications, hours of service requirements, and distinction of roles for as long as Special Directive 22-6 remains open.

Additionally, FTA will require the MBTA to submit the current OCC staffing plan for each role within the OCC two days prior to each SD 22-6 bi-weekly meeting until February 5, 2023. FTA will provide further direction on reporting requirements for the OCC staffing plan prior to January 31, 2023.

Conclusion

We appreciate your efforts to enhance MBTA's safety performance, and we look forward to working with you and your team as the MBTA addresses these findings and required actions. Please contact our SMI Coordinator, Erin Powell, by phone at (202) 771-8016 or by email at Erin.Powell@dot.gov with any questions.

Sincerely,



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

cc: Peter Butler, Regional Administrator, FTA Region 1
Jeffrey Gonville, Deputy General Manager, MBTA
Ron Ester, Chief Safety Officer, MBTA
Erik Stoothoff, Chief Operations Officer, MBTA
Dave Carney, Chief of Transit Services, MBTA
Elizabeth Cellucci, Director, Transportation Oversight Division, Massachusetts Department of Public Utilities