



U.S. Department
of Transportation
**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

July 17, 2024

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

Subject: Approval – Due Date Relief for Special Directive 22-12, Corrective Action Plans FTA-22-12-MBTA-CAT4-4 and FTA-22-12-MBTA-CAT4-5

Dear Mr. Eng,

On July 3, 2024¹, the Federal Transit Administration (FTA) received a request from the Massachusetts Bay Transportation Authority (MBTA) to extend the due dates for action items 13, 14, and 15 in Corrective Action Plan (CAP) FTA-22-12-MBTA-CAT4-4 and for action items 13 and 14 in CAP FTA-22-12-MBTA-CAT4-5, previously submitted by MBTA and approved by FTA in response to Special Directive 22-12.

FTA-22-12-MBTA-CAT-4-4 Request for Relief

In its request for relief, MBTA cited the impact of the need to develop training initiatives to address ongoing and unanticipated changes in its Roadway Worker Program to address requirements from FTA and the Massachusetts Department of Public Utilities. It also stated that the Massachusetts Department of Transportation’s decision to end support of the shared Cornerstone learning management system (LMS) has delayed their ability to the LMS to support its work to address this CAP as MBTA transitions to managing the LMS on its own.

MBTA has proposed the following due dates for these action items:

Action Item #	Description	Due Date*	Proposed Due Date
13	Training Plan Development	7/1/2024	12/20/2024
14	Develop and document process for updating training plans	7/1/2024	12/20/2024
15	Key Performance Indicator Metrics	7/1/2024	12/20/2024

* FTA previously approved a two-month extension request for action items 13 and 15 and a six

¹ Letter dated June 18, 2024, and received by FTA on July 3, 2024.

month extension for action item 14 in CAP FTA-22- 12-MBTA-CAT4-4 in correspondence dated November 6, 2023.

FTA-22-12-MBTA-CAT-4-5 Request for Relief

In its request for relief, MBTA cited its work to implement mobile access to a central database of documents, which will continue through calendar year 2025. It also references the impact of the approved relief request for Special Directive 22-12 CAP FTA-22-12-MBTA-CAT-4-3, which extends the timeline to implement the Enterprise Document Management System. Consequently, MBTA requests relief for action items relating to the establishment of mobile access and the process for program adjustments and review. MBTA confirms that it will continue to gather reference documentation to support full build-out of the document management system and will provide interim updates.

MBTA has proposed the following due dates for these action items:

Action Item #	Description	Due Date	Proposed Due Date
13	Establish mobile access to central repository documents	6/30/2024	6/1/2025
14	Establish process for maintenance and training program adjustments and wholesale review	7/31/2024*	6/1/2025

** FTA previously approved a one-month extension request for action item 14 in CAP FTA-22- 12-MBTA-CAT4-5 in correspondence dated November 6, 2023.*

Approval of Due Date Relief for FTA-22-12-MBTA-CAT-4-4 Action Items 13, 14, and 15 and for FTA-22-12-MBTA-CAT-4-5 Action Items 13 and 14

FTA approves the request to amend the due dates for these items as listed in the tables above.

Should you have any questions or require additional clarification, please do not hesitate to contact our Safety Management Inspection Coordinator, Christian Hernandez, at 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
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