



U.S. Department  
of Transportation

**Federal Transit  
Administration**

Headquarters

1200 New Jersey Avenue, SE  
Washington, DC 20590

**SENT VIA EMAIL**

March 26, 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-24-5-002 (Oversight of SEPTA's Safety Management Systems Implementation)**

Dear Ms. Biggica,

On March 4, 2025, the Pennsylvania Department of Transportation (PennDOT) submitted a request to close required action FTA-24-5-002, which is associated with Finding 2 of Special Directive 24-5: "PennDOT Must Expand Activities to Address [the Southeastern Transportation Pennsylvania Transit Authority's (SEPTA)] Lagging Safety Management System (SMS) Implementation."

Required action FTA-24-5-002 states that: "PennDOT must require SEPTA to develop a detailed and expedited milestone schedule for its SMS implementation plan, including new resources to support its SMS program as specified in Special Directive 24-2, and oversee its implementation. PennDOT must submit the SMS implementation plan with assigned resources and monthly status reports to FTA for review, approval, and implementation monitoring."

**Response to Closure Request**

While we appreciate PennDOT's efforts in requiring SEPTA to develop a detailed milestone schedule and submitting SEPTA's approved SMS Implementation Plan, we are unable to close this required action based on PennDOT's submissions to date. The required action associated with FTA-24-5-002 requires not only the development and submission of the plan but also ongoing implementation monitoring by PennDOT. The required action explicitly requires PennDOT—not SEPTA—to oversee implementation of the SMS Implementation Plan and provide FTA with regular status reports on the oversight activities conducted to monitor SEPTA's implementation progress.

This required action will remain open until SEPTA has successfully implemented its SMS Implementation Plan, with documented evidence of PennDOT's continuous oversight throughout

the process. Although we have received your oversight plan dated March 4, 2025, PennDOT still must submit ongoing monthly reports documenting the oversight activities performed, including specific findings related to SEPTA's progress.

PennDOT may resubmit its closure request when all the following conditions have been met:

- SEPTA has completed all milestones outlined in its SMS Implementation Plan.
- PennDOT has demonstrated consistent and comprehensive oversight of SEPTA's implementation through detailed monthly status reports.
- PennDOT has verified that SEPTA's SMS meets all requirements specified in 49 CFR part 673.

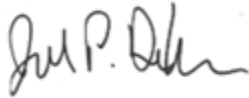
## Conclusion

We appreciate PennDOT's ongoing commitment to enhancing transit safety oversight and look forward to receiving the required monthly status reports.

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