



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-24-5-006 (Oversight of SEPTA's AED Inspection and Service Program)

Dear Ms. Biggica,

On February 21, 2025, the Pennsylvania Department of Transportation (PennDOT) submitted a request to close required action FTA-24-5-006, which is associated with Finding 6 of Special Directive 24-5: "Required Actions to Strengthen Safety Oversight of the Southeastern Pennsylvania Transportation Authority's [(SEPTA)] Rail Transit System."

Required action FTA-24-5-006 requires PennDOT to "direct SEPTA to assess the current condition of its [Automated External Defibrillators (AED)] inspection and service program and make any changes or require corrective actions as needed to ensure compliance with Pennsylvania statutes and SEPTA's Agency Safety Plan [(ASP)]. PennDOT must submit the assessment (and corrective actions if applicable) to FTA for review, approval, and implementation monitoring."

Response to Closure Request

After reviewing PennDOT's assessment of SEPTA's AED inspection and the associated actions, we are unable to close this required action at this time. This is based on the results of onsite verification activities conducted in March 2025. The results of those activities and the resulting actions needed by PennDOT are outlined below.

Actions Required to Address FTA-24-5-006 (Oversight of SEPTA's AED Inspection and Service Program)

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To fully address FTA-24-5-006, PennDOT must ensure SEPTA corrects all of its inoperable AED cabinet alarms under the SSOA's jurisdiction. As specified in SEPTA ASP Section 15.1.1.16, "Each unit is stored in an alarmed, wall-mounted cabinet. The audible alarm has sufficient volume relative to background station and/or shop noise (typically 70-75 dB) to immediately alert those within the area." Additionally, one corrective action plan (CAP) SEPTA wrote and PennDOT approved (CAP 5140) states that: "AED units stored at facilities are installed with an audible alarm cabinet." However, while onsite in March 2025, FTA observed AED units in the Walnut-Locust Station manager's office, Southern Depot, and Elmwood Depot that did not sound the alarm when the units were opened. Furthermore, during this onsite field activity, a SEPTA transit worker closely involved with the AED program incorrectly stated that cabinet alarms are not required. These deficiencies must be addressed.

Additionally, for your awareness, while onsite in March 2025 at a facility not under PennDOT rail transit safety oversight jurisdiction (Suburban Station), FTA also observed an AED unit that was missing accessory components such as adult pads, masks, and scissors. Although this unit is not under PennDOT's safety oversight jurisdiction, the unit is maintained under the same contract that governs the rest of SEPTA's AED program. PennDOT may wish to pay particular attention to AED accessory components when conducting its routine oversight activities for AEDs under its jurisdiction.

Conclusion

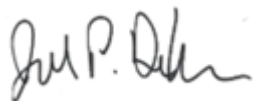
PennDOT's actions to oversee SEPTA's AED Inspection and Service Program did not ensure AEDs across the agency were compliant with SEPTA's own requirements.

PennDOT must submit documentation that confirms operability of all SEPTA's AED cabinet alarms under the SSOA's jurisdiction within 90 business days of the date of this letter. This submission must include a detailed explanation how the issues above were resolved and whether PennDOT found any other deficient AEDs. This submission must also describe the oversight PennDOT is currently performing, or planning to perform, to verify that SEPTA's AED program is compliant with the ASP (Section 15.1.1.16) and State requirements.

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

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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