



U.S. Department
of Transportation

**Federal Transit
Administration**

Headquarters

1200 New Jersey Avenue, SE
Washington, DC 20590

SENT VIA EMAIL

May 13, 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-24-5-007-2 (Oversight of SEPTA REE&M Safety-Critical Document Control)

Dear Ms. Biggica,

On March 4, 2025, the Pennsylvania Department of Transportation (PennDOT) submitted a request to close required action FTA-24-5-007-2, which is associated with Finding 7 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-24-5-007-2 states that:

“... PennDOT must review [SEPTA’s Rail Equipment Engineering and Maintenance Department’s (REE&M)] method for distributing [Standard Operating Procedures (SOP)] as Notices on bulletin boards and direct SEPTA REE&M to formalize existing SOPs or procedures into a more trackable and comprehensive media available to the transit workers. PennDOT must submit the revised practices and supporting documentation to FTA for review, approval, and implementation monitoring.”

Response to Closure Request

While we appreciate PennDOT’s efforts in requiring and overseeing SEPTA’s development, revision, and implementation an updated process for distributing SOPs, we are unable to close this required action based on the results of onsite verification activities conducted in January and March 2025. In fact, as described below, PennDOT must take additional oversight actions to address deficiencies we documented.

Actions Required to Address FTA-24-5-007-2 (Oversight of SEPTA REE&M Safety-Critical Document Control)

During onsite verification activities FTA conducted in January and March 2025, FTA observed multiple field locations, such as Elmwood and Woodland Shops, where the SOP was not being followed as written. Violations of the SOP included other departmental policies and notices posted on REE&M bulletin boards instead of only the SOP (violates SOP Section 4.3.2), missing content (violates SOP Section 4.3.3), obscured SOPs (violates Section 4.1.3), and documents posted over other documents (violates SOP 03-0003 Section 3.3). To fully address FTA-24-5-007-2, PennDOT must ensure SEPTA implements SEPTA SOP 03-003, the SOP that governs distribution of REE&M SOPs.

Required action FTA-24-5-007-2 will remain open until PennDOT ensures SEPTA maintains compliance with SOP 03-0003 across all applicable REE&M facilities and documented evidence demonstrates PennDOT's continuous oversight throughout the process.

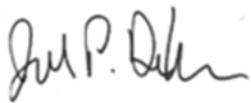
PennDOT may resubmit its closure request when both of the following conditions have been met:

- PennDOT has demonstrated consistent and comprehensive oversight of SEPTA's compliance with SOP 03-0003.
- FTA verification activities confirm implementation of SOP 03-0003.

If you have any questions, please contact Special Directive Coordinator Syed Ahmed at 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: Ms. Elizabeth Bonini, Director, State Safety Oversight Office, PennDOT
Mr. J.M. McLaughlin, State Safety Oversight Regional Manager, PennDOT
Ms. Terry Garcia Crews, Regional Administrator, FTA Region 3
Mr. Tony Tarone, Deputy Regional Administrator, FTA Region 3
Mr. Jonathan Wohlhagen, General Engineer, FTA Region 3