

UNITED STATES DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

[Special Directive No. 25-2, Notice No. 1]

Special Directive Under 49 U.S.C. § 5329 and 49 CFR Part 670 to the Pennsylvania Department of Transportation to Strengthen State Safety Oversight of the Southeastern Pennsylvania Transportation Authority's Overhead Catenary System Inspection and Maintenance Program

AGENCY: Federal Transit Administration (FTA), U.S. Department of Transportation (DOT).

SUMMARY: FTA issues Special Directive 25-2 to require the Pennsylvania Department of Transportation (PennDOT) to take actions to address critical safety deficiencies in its safety oversight of the Southeastern Pennsylvania Transportation Authority's (SEPTA) overhead catenary system (OCS), which are necessary for PennDOT to provide adequate safety oversight of SEPTA's OCS consistent with the prevention of substantial risk of death or personal injury. FTA has determined the issuance of this Special Directive is necessary to avoid or mitigate the risk presented by PennDOT's oversight deficiencies through immediate compliance.

This Special Directive identifies two findings related to PennDOT's oversight of SEPTA's OCS program. To address these findings, FTA directs PennDOT to complete eight required actions, including: strengthening and deploying technical resources; evaluating SEPTA's forthcoming OCS Inspection and Maintenance (I&M) Program; overseeing SEPTA's interim and formal OCS inspection activities; conducting onsite inspections and verifications; and providing monthly oversight reports to FTA.

FOR FURTHER INFORMATION CONTACT: For program matters, Mr. Joseph DeLorenzo, Associate Administrator for Transit Safety and Oversight and Chief Safety Officer, telephone 202-366-1783 or joseph.delorenzo@dot.gov; for legal matters, Mr. Alexander Lipow, Attorney Advisor, FTA, telephone 202-366-4011 or alexander.lipow@dot.gov.

SUPPLEMENTARY INFORMATION:

Background

FTA administers a national public transportation safety program to advance safe and reliable transit service throughout the United States. FTA conducts safety investigations, assesses transit agency safety management practices, monitors State Safety Oversight (SSO) programs, and issues Special Directives when, among other things, FTA identifies unsafe conditions or practices that present a substantial risk of death or personal injury.

PennDOT's SSO Division is the State Safety Oversight Agency (SSOA) designated by the Commonwealth of Pennsylvania as responsible for overseeing rail transit safety in Pennsylvania. PennDOT's SSOA was certified by FTA in April 2018 in accordance with 49 U.S.C. § 5329 and 49 CFR Part 674. PennDOT receives FTA grant funds to carry out its SSO program in accordance with Federal regulations. PennDOT serves as the designated SSOA for SEPTA.

Since late September 2025, SEPTA has experienced a series of serious OCS-related safety events that highlight weaknesses in SEPTA's ability to identify and manage safety risk related to infrastructure condition. On September 25, 2025, a pantograph separation on the Media-Sharon Hill (D1/D2) Line caused OCS components to penetrate a trolley roof, injuring 11 passengers. This event is under National Transportation Safety Board (NTSB) investigation. On October 14, 2025, a dewirement and hardware failure on the Subway-Surface Line stalled four trains, requiring approximately 155 passengers to be evacuated under emergency conditions. On October 15, 2025, a second pantograph-related event occurred on the D1/D2 Line, again requiring passenger evacuation. On October 22, 2025, a broken OCS clip caused de-energization of the Subway-Surface Line and evacuation of about 300 passengers. On November 4, 2025, a T5 line trolley experienced a trolley pole failure related to the OCS, which resulted in a small fire on the pole rope, requiring four passengers to be evacuated.

FTA investigation into these failures found substantial deficiencies in SEPTA's OCS inspection, maintenance, documentation, and risk management practices. On October 31, 2025, FTA issued a letter to SEPTA requiring SEPTA to conduct an immediate inspection of its entire trolley OCS network, promptly repair critical and major defects, implement interim safety mitigations, and document inspection results using qualified personnel and calibrated tools. FTA issued Special Directive 25-1 to SEPTA on November 25, 2025, which supersedes the October 31 letter and directs SEPTA to correct defects with its OCS, develop a formal OCS inspection and maintenance program, and implement necessary safety controls. SEPTA must submit the relevant documentation to both FTA and PennDOT.

FTA's review of PennDOT's oversight activities during the same period shows PennDOT was aware SEPTA lacked an OCS inspection and maintenance program but did not require corrective action. Furthermore, despite heightened Federal scrutiny from FTA and NTSB, PennDOT has not participated consistently in OCS investigations or onsite verification activities and does not maintain a structured process for evaluating engineered changes to SEPTA's traction power or OCS systems.

FTA also identified significant weaknesses in PennDOT's response to SEPTA's post-event activities following the September 25, 2025 OCS failure and the subsequent October 15, 2025 pantograph entanglement event. PennDOT did not oversee or review SEPTA's decision to suspend OCS service and rail transit operations after the September 25 event, nor did PennDOT evaluate or approve SEPTA's decision to restart service. Instead, PennDOT informed FTA that, because SEPTA voluntarily suspended service, the decision to resume service rested solely with SEPTA.

Although the October 15 event exhibited multiple similarities to the September 25 failure and occurred just 72 hours after SEPTA had returned the OCS to service after the September 25 event, PennDOT did not deploy to the scene of the October 15 event and did not inquire further into the event beyond minimum FTA reporting criteria. During meetings with FTA, PennDOT was unaware of a critical communication breakdown documented by SEPTA in its initial event summary and follow-up report from October 17, 2025.

While 49 CFR Part 674 does not require an SSOA to respond in person to every reported safety event, § 674.35(b) requires the SSOA to ensure the sufficiency and thoroughness of all investigations—whether conducted by the SSOA or the rail transit agency. Additionally, § 674.37(b) requires the SSOA to review and approve any immediate or emergency corrective actions a rail transit agency takes to ensure immediate safety. Decisions to suspend or resume service following a major safety event clearly fall within this category. PennDOT’s lack of engagement during SEPTA’s post-event actions prevented PennDOT from ensuring SEPTA’s investigation, interim mitigations, and return-to-service readiness were sufficient to protect the public and workforce.

Consistent with PennDOT’s statutory role in conducting independent oversight of SEPTA, and because SEPTA’s deficiencies require technical review and proactive oversight, FTA is issuing this Special Directive to ensure that PennDOT has the proper resources and performs the necessary oversight.

Finding 1. PennDOT Has Not Effectively Deployed Technical Capacity to Oversee SEPTA’s OCS Inspection and Maintenance Program

FTA finds that, although PennDOT maintains a Technical Training Program (TTP) as required by 49 CFR Parts 672 and 674, and although PennDOT indicates it employs or contracts personnel who meet 49 CFR §672.21(e)(3)(iii)(M) competency requirements in “[t]raction power (substations, overhead catenary system, and third rail system), load dispatching, inspection and maintenance programs, schedules and records,” these resources have not been effectively deployed to oversee SEPTA’s OCS inspection and maintenance practices. Despite notionally controlling qualified technical staff, PennDOT has not used these personnel in a manner sufficient to independently identify safety risk, evaluate the effectiveness of SEPTA’s inspection and maintenance activities, or detect the systemic deficiencies later identified by FTA.

Prior to FTA’s intervention following the September 25, 2025 pantograph separation and contact wire penetration event, PennDOT had not directed corrective actions, issued program-level findings, or undertaken targeted oversight activities related to SEPTA’s OCS inspection and maintenance program. The subsequent major OCS-related safety events on October 14 and October 15—both of which shared significant similarities with the September 25 failure—did not prompt PennDOT to initiate an investigation, direct timely corrective action, or begin enhanced monitoring of SEPTA’s OCS conditions or maintenance practices. PennDOT did not actively follow up on these events despite clear indicators of recurring OCS component failures and underlying maintenance deficiencies.

FTA’s review indicates PennDOT did not deploy its technically qualified staff or contractors to participate in SEPTA’s OCS inspections, conduct onsite evaluations, review defect data, or assess SEPTA’s engineering-based maintenance practices prior to FTA’s engagement. As a result, PennDOT was not positioned to identify limitations in SEPTA’s inspection methods, measurement practices, calibration controls, defect classifications, or documentation standards. Nor did PennDOT detect the absence of engineering tolerances, acceptance criteria, or a formal OCS inspection and maintenance program—issues that FTA later determined to be significant contributors to SEPTA’s recurring OCS failures.

Given PennDOT's responsibility to provide independent safety oversight and ensure hazards are identified, investigated, assessed, and mitigated, FTA finds that PennDOT has not maintained the level of active, onsite oversight necessary to ensure SEPTA's development and implementation of its OCS I&M Program comply with Federal requirements. PennDOT must strengthen its deployment of technical resources and actively apply its TTP-qualified staff to oversee SEPTA's OCS program effectively.

SEPTA's current OCS maintenance practices, as documented in Special Directive 25-1, lack engineering tolerances, defined acceptance criteria, calibration standards, documented inspection frequencies, and monitoring tools necessary for a fully developed, engineering-based maintenance program. Under Special Directive 25-1, SEPTA is required to:

- Develop a comprehensive OCS I&M Program with documented engineering tolerances, inspection frequencies, measurement requirements, acceptance criteria, calibration standards, component-specific inspection procedures, and integrate into its Safety Management System by January 28, 2026 (Required Action FTA-25-1-002-3);
- Fully implement the new program—including new inspections, monitoring tools, quality assurance and quality control (QA/QC) processes, and safety assurance elements—by April 28, 2026 (Required Action FTA-25-1-002-4); and
- Submit twice-monthly reports to FTA and PennDOT documenting program development, inspections, defect findings, and critical conditions (Required Action FTA-25-1-002-5).

PennDOT must independently verify not only that SEPTA meets each requirement in Special Directive 25-1, but also that the resulting program is technically adequate and implemented in a way that effectively mitigates OCS safety risk. PennDOT must subject SEPTA's OCS inspection and maintenance program to an independent engineering review prior to FTA approval. This review must ensure the technical adequacy of the program and confirm that it addresses the systemwide safety risk identified through FTA's investigation and specified in Special Directive 25-1. PennDOT must independently evaluate whether SEPTA's maintenance practices, engineering standards, and system modifications are technically sound, risk-based, and sufficient to ensure safe operations.

In addition, PennDOT must independently verify whether SEPTA's program includes appropriate engineering thresholds for wire wear, wire height, tensioning, frog and crossing condition, insulator specifications, component replacement criteria, and monitoring of pantograph-to-wire interaction. PennDOT must also assess whether SEPTA's proposed procedures provide clear instructions for inspections, defect classification, repair verification, return-to-service determinations, and environmental or operational stress evaluations.

FTA also finds PennDOT currently lacks a defined process for reviewing engineered changes to SEPTA's OCS and traction power systems before SEPTA implements such changes. SEPTA stated that its recent engineering modifications—including alterations to contact wire and hardware, changes in tensioning systems, and replacement of OCS components—can introduce

safety risk if not supported by appropriate analysis or technical review and led to adverse conditions contributing to the five safety events described above. Further, at the time of these five events, PennDOT was unaware of these critical changes to key components of SEPTA's OCS. As SEPTA develops and begins implementing its formal OCS program, system modifications, component replacements, and engineering updates will occur frequently and must be subject to PennDOT's independent technical review.

Accordingly, PennDOT must evaluate all engineered changes to SEPTA's OCS and traction power systems before implementation. PennDOT must submit its independent engineering assessment of SEPTA's full OCS I&M Program to FTA within 30 days of receiving the submission from SEPTA.

FTA finds that PennDOT has not maintained an active onsite presence during SEPTA's OCS inspections, defect verifications, or program-level maintenance activities, and has not consistently reviewed SEPTA's inspection methods, documentation, or safety assurance processes. As a result, PennDOT did not identify deficiencies in SEPTA's inspection procedures, defect classifications, measurement practices, or technical standards prior to FTA's involvement—deficiencies that Special Directive 25-1 now requires SEPTA to correct.

Given that development and implementation of a formal engineering-based OCS I&M Program involves new inspection procedures, new tolerances and measurements, new calibration controls, new monitoring tools, and new QA/QC requirements, PennDOT must conduct active onsite oversight to ensure these elements are appropriately developed and consistently applied in practice. PennDOT must also verify that SEPTA is meeting its monthly reporting obligations, that reported progress is accurate, that defect corrections are complete and technically sound, and that the new program is functioning effectively once implemented.

Finding 2. PennDOT Did Not Conduct Independent Investigation of Repeat OCS Safety Events and Did Not Review, Approve, and Oversee Emergency Corrective Actions

As specified in PennDOT's September 2025 Program Standard, PennDOT may authorize SEPTA to conduct an event investigation on its behalf, or PennDOT may elect to conduct an independent event investigation or conduct supplemental investigation activities separate from those undertaken by SEPTA. In the Program Standard, PennDOT clarifies it may conduct its own investigation "if there is a problem with investigation independence, if the RTA is unable to conduct an investigation on PennDOT SSOA's behalf, or for any other reason as deemed appropriate by PennDOT SSOA." To conduct its own investigation, PennDOT will notify SEPTA in writing to SEPTA's Chief Safety Officer and Accountable Executive as soon as possible. However, PennDOT's typical process is to authorize SEPTA to conduct the investigation on its behalf and to participate in some investigation activities, and PennDOT will work with SEPTA to review and approve the final investigation report. PennDOT also may occasionally conduct joint investigations with SEPTA.

During FTA's investigations into SEPTA's five OCS events in September through November 2025, and the subsequent review of SEPTA's urgent inspection and follow-on submissions, FTA finds PennDOT's own investigation process relied heavily on SEPTA's investigation activities

and did not provide engaged and independent oversight as required by 49 CFR Part 674. PennDOT did not respond onsite to the October 15 safety event and did not consistently deploy resources with expertise in traction power and OCS inspection and maintenance to ensure the sufficiency of investigation findings. PennDOT also did not review, approve, and oversee immediate actions that SEPTA took in response to the OCS safety events, and PennDOT allowed SEPTA to make determinations regarding the safety of its return-to-service without oversight review and approval pursuant to 49 CFR § 674.37.

PennDOT has clarified it will not issue independent reports for these five OCS events but instead will review and approve SEPTA's reports. FTA reminds PennDOT that, under 49 CFR § 674.35(b), PennDOT is ultimately responsible for the sufficiency and thoroughness of all investigations, whether conducted by SEPTA or itself. FTA is concerned PennDOT's response fails to acknowledge and address the serious deficiencies with SEPTA's OCS I&M Program that led to recurring safety events.

Given the serious safety risk associated with recent OCS events, FTA finds PennDOT failed to identify issues with repeat OCS safety concerns; failed to escalate investigative activities; failed to actively engage in oversight to ensure SEPTA's investigations effectively identified probable and contributing factors; failed to ensure SEPTA implemented appropriate mitigations; and failed to review, approve, and oversee emergency corrective action taken to address immediate safety concerns. Furthermore, in the absence of prompt, effective oversight action, PennDOT also failed to require urgent action to address OCS deficiencies, including OCS inspection and maintenance.

To address these deficiencies, PennDOT must submit regular oversight reports to FTA to ensure transparency, allow FTA to monitor PennDOT's execution of its oversight responsibilities, and confirm PennDOT is conducting the required level of independent oversight of SEPTA's OCS inspection, maintenance, defect correction, and program development activities outlined in Special Directive 25-1.

Because PennDOT's oversight responsibilities include verifying SEPTA's defect classifications, confirming corrective actions, evaluating engineering analyses, participating in onsite inspections, and overseeing development and implementation of SEPTA's formal OCS I&M Program, FTA requires regular reporting to determine whether PennDOT is performing these activities consistently and with sufficient technical rigor. Monthly reporting is necessary for FTA to track PennDOT's progress, evaluate the adequacy of its oversight actions, and determine whether PennDOT is identifying and addressing safety deficiencies through its independent oversight of SEPTA.

The OCS safety issues identified in Special Directive 25-1, including repeated component failures and the absence of engineering-based maintenance standards, require active, continuous oversight by PennDOT. Without structured monthly reporting, FTA would lack visibility into PennDOT's onsite activities, findings, and follow-up actions and would be unable to assess whether PennDOT is providing the necessary level of independent safety oversight. Therefore, PennDOT must submit monthly reports documenting its oversight activities, observations, determinations, and corrective action follow-ups so that FTA can monitor PennDOT's

performance and ensure that PennDOT is fulfilling its statutory role as SEPTA's SSOA.

DIRECTIVE AND REQUIRED ACTIONS:

In accordance with 49 U.S.C. § 5329 and 49 CFR part 670, FTA directs PennDOT to take the following actions:

Findings		Tracking #	Required Actions
Finding 1	PennDOT Has Not Effectively Deployed Technical Capacity to Oversee SEPTA's OCS Inspection and Maintenance Program	FTA-25-2-001-1	PennDOT must demonstrate (and obtain, if necessary) sufficient traction power and OCS engineering expertise to oversee SEPTA's OCS program. This expertise must be sufficient to independently evaluate SEPTA's OCS inspection standards, inspection results, engineering tolerances, repair practices, and program development activities. PennDOT must notify FTA of the personnel or contractors fulfilling this role and provide documentation of their qualifications by December 2, 2025. PennDOT must also notify FTA within five business days of any personnel or contractor changes while this Special Directive is open, including any increase or decrease in hours dedicated to overseeing SEPTA's OCS program.
		FTA-25-2-001-2	By February 27, 2026, PennDOT must conduct an independent engineering review of the full program and submit its written assessment to FTA for review and approval. This review must evaluate whether SEPTA's proposed program is complete, technically adequate, and consistent with the elements required under Special Directive 25-1. PennDOT must independently verify whether SEPTA's program includes appropriate engineering thresholds for wire wear, wire height, tensioning, frog and crossing condition, insulator specifications, component replacement criteria, and monitoring of pantograph-to-wire interaction. PennDOT must also assess whether SEPTA's proposed procedures provide clear instructions for inspections, defect

Findings	Tracking #	Required Actions
		classification, repair verification, return-to-service determinations, and environmental or operational stress evaluations. The assessment must include PennDOT's findings, recommendations, identification of any deficiencies, and determinations regarding the program's ability to address known safety risks in SEPTA's OCS and traction power system. This assessment must be completed prior to FTA's approval of SEPTA's OCS I&M program and prior to SEPTA implementing any engineered change to the OCS or traction power systems.
	FTA-25-2-001-3	By December 29, 2025, PennDOT must formalize its approach to being notified of, receiving, and evaluating all engineered changes proposed by SEPTA to its OCS and traction power systems and submit its formalized approach to FTA for review, approval, and implementation monitoring. This process must require SEPTA to provide timely notice and submit sufficient engineering documentation for PennDOT to conduct an informed review. PennDOT's evaluations must competently assess the technical impacts, safety implications, and system integration considerations of any engineered change. These evaluations must be completed prior to SEPTA implementing any engineered change to the OCS or traction power systems. PennDOT must apply this process consistently as SEPTA develops and implements its formal OCS Inspection and Maintenance Program and any associated system modifications. PennDOT must notify FTA within 5 calendar days of engineered changes proposed by SEPTA to its OCS and traction power systems.

Findings	Tracking #	Required Actions
		FTA-25-2-001-4 PennDOT must conduct active, ongoing oversight of SEPTA's development of the formal OCS I&M Program required under Special Directive 25-1. PennDOT must: • Review SEPTA's December 1, 2025 action plan outlining the step-by-step activities SEPTA will undertake to develop the program; • Verify that SEPTA is developing all required program elements, including engineering tolerances, inspection frequencies, measurement requirements, acceptance criteria, calibration standards, component-specific inspection procedures, monitoring tools, documentation controls, QA/QC processes, and integration into SEPTA's Safety Management System; • Monitor SEPTA's progress toward completing the full OCS I&M Program by January 28, 2026; and • Submit for FTA review documentation of PennDOT's oversight activities and evaluations to support FTA's determination of program adequacy. PennDOT must notify FTA within three business days of any deficiencies it identifies while overseeing SEPTA's I&M Program development and must direct SEPTA to address such deficiencies. PennDOT must submit documentation to FTA of its instructions to SEPTA, SEPTA's response, and the PennDOT-approved corrective action.
		FTA-25-2-001-5 PennDOT must actively oversee SEPTA's implementation of the formal OCS I&M Program to ensure the Program is applied consistently and effectively once adopted. PennDOT must: • Participate onsite in SEPTA's OCS field

Findings	Tracking #	Required Actions
		inspections, defect verifications, and return-to-service assessments; • Verify that SEPTA is implementing all procedures, tolerances, measurements, acceptance criteria, calibration standards, monitoring tools, and QA/QC processes included in the adopted OCS I&M Program; • Evaluate SEPTA's interim inspections and determine whether defect classifications, mitigations, and corrective actions are technically adequate and supported by engineering criteria; • Review SEPTA's monthly Special Directive 25-1 reports to confirm accuracy, completeness, and alignment with observed conditions and program implementation status; and • Document all onsite activities, observations, and determinations as part of PennDOT's monthly Special Directive 25-2 oversight report to FTA. PennDOT must identify any areas where SEPTA is not implementing the OCS I&M Program as required and must direct SEPTA to take corrective action. PennDOT must submit documentation to FTA of its instructions to SEPTA, SEPTA's response, and the PennDOT-approved corrective action.
	FTA-25-2-001-6	PennDOT or its agents must maintain a regular, documented onsite presence during SEPTA's OCS inspections, maintenance activities, defect corrections, and verification work. PennDOT must participate in field activities with sufficient frequency to independently verify: • The accuracy of SEPTA's inspection results; • The completeness and quality of defect repairs;

Findings		Tracking #	Required Actions
			• The effectiveness of interim mitigations; • The proper application of inspection and measurement procedures; and • Whether SEPTA's implementation of the program is reducing OCS safety risk. PennDOT onsite participation must be substantive, continuous throughout the development and implementation periods, and sufficient to support independent evaluations of SEPTA's compliance with Special Directive 25-1. PennDOT must submit documentation of its oversight activities along with the monthly report required in Required Action FTA-25-2-004.
Finding 2	PennDOT Did Not Conduct Independent Investigation of Repeat OCS Safety Events and Did Not Review, Approve, and Oversee Emergency Corrective Action	FTA-25-2-002-1	By December 2, 2026, PennDOT must submit all calendar year 2025 SEPTA OCS safety event investigation records and reports to FTA, inclusive of SEPTA records and reports in PennDOT's possession and PennDOT records and reports of its own investigations and independent reviews. Beginning immediately upon the issuance of this Special Directive, PennDOT must submit all future SEPTA OCS safety event investigation records and reports to FTA within two calendar days of PennDOT receipt or generation and ensure that: • Repeat OCS safety concerns are identified; • Investigations identify probable and contributing factors to be mitigated; and • Emergency corrective actions taken to address immediate safety concerns are thoroughly reviewed, approved, and overseen.
		FTA-25-2-002-2	Beginning January 5, 2026 and on the first business day of each month through January 3, 2028 (subject to extension by FTA), PennDOT must submit to FTA a written oversight report summarizing PennDOT's independent oversight of SEPTA's OCS

Findings	Tracking #	Required Actions
		inspection, maintenance, defect correction, and program development activities under Special Directive 25-1. Each monthly report must include: • Oversight Actions Conducted: A summary of PennDOT's oversight activities during the reporting period, including reviews, audits, technical evaluations, and onsite engagement and a summary of hours dedicated to this oversight (ex.: hours spent on field inspections of OCS components in a specific area, hours spent reviewing OCS inspection procedure updates, etc.). • Onsite Inspections and Observations: Documentation of PennDOT's onsite participation in SEPTA's OCS inspections, defect verifications, investigations, and field activities. • Verification of SEPTA's Implementation of Special Directive 25-1: Assessments of whether SEPTA is meeting required deadlines, implementing the formal OCS I&M Program, applying inspection procedures correctly, and maintaining calibration, measurement, and documentation standards. • Findings and Deficiencies: Identification of any deficiencies observed in SEPTA's inspection or maintenance activities, program development, engineering analyses, or reporting. • Corrective Actions Directed and Follow-Up: A description of corrective actions PennDOT required SEPTA to take, and PennDOT's verification of whether those actions have been completed. • Status of PennDOT's Technical Capacity: Updates on PennDOT's traction power/OCS engineering resources, including staffing, training, contracting, or changes in technical capability.

Findings		Tracking #	Required Actions
			PennDOT must submit these reports in a manner and format acceptable to FTA. FTA may require PennDOT to take additional oversight actions or provide supplemental reporting if deficiencies, gaps, or inconsistencies are identified in PennDOT's oversight activities or reporting.

FTA will receive submissions from both PennDOT and SEPTA and monitor PennDOT's progress in resolving each finding and required action. FTA will conduct scheduled meetings with PennDOT to review its progress until such time as FTA determines that these meetings are no longer needed or may be conducted with less frequency. FTA also will conduct onsite inspections and assessments to confirm implementation of required actions. This Special Directive does not supersede or otherwise change other Special Directives that FTA has issued to PennDOT or SEPTA.

PETITIONS FOR RELIEF OR RECONSIDERATION

As set forth in 49 CFR § 670.27(d), PennDOT has 30 calendar days from the date of this Special Directive to petition for reconsideration with the FTA Administrator. The petition must be in writing, must be signed by PennDOT's Accountable Executive, and must include a brief explanation of why PennDOT believes the Special Directive should not apply or why compliance is not possible, is not practicable, is unreasonable, or is not in the public interest. The petition may include relevant information regarding the factual basis upon which the Special Directive was issued; information in response to any alleged violation or in mitigation thereof; recommended alternative means of compliance for consideration; and any other information SEPTA deems appropriate.

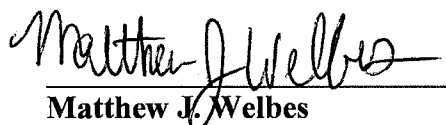
Unless explicitly stayed or modified by the Administrator, this Special Directive remains in effect pending review of any petition.

Within 90 days of receiving a petition, the Administrator will provide a written response. Relief may be granted only where PennDOT clearly articulates alternative actions that will provide, in the Administrator's judgment, a level of safety equivalent to compliance with this Special Directive, or where PennDOT identifies legal or material facts not in evidence at the time the Special Directive was issued.

ENFORCEMENT

FTA may take enforcement action for any violation of this Special Directive or of the terms of any written plan adopted pursuant to this Special Directive, in accordance with FTA's authorities under 49 U.S.C. § 5329. Enforcement actions include, but are not limited to, directing PennDOT to use Federal financial assistance to correct safety deficiencies.

Issued on: November 25, 2025

A handwritten signature in black ink, reading "Matthew J. Welbes". The signature is written in a cursive style with a horizontal line underneath the name.

Matthew J. Welbes
Executive Director
Federal Transit Administration
U.S. Department of Transportation