



Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Monica Tibbitts-Nutt, Secretary & CEO
Phillip Eng, General Manager & CEO



Honorable Mark Montigny
Chair, Senate Committee on Post Audit and Oversight
State House, Room 312C
Boston, MA 02133

May 2, 2025

Dear Chair Montigny,

The Massachusetts Bay Transportation Authority (MBTA) and its Commuter Rail operating partner Keolis Commuter Services (Keolis) are in receipt of your April 24, 2025 letter and request for information regarding the delivery of service on the Fall River/New Bedford commuter rail lines since its March 24, 2025 opening. Pursuant to Section 63 of Chapter 3 of the Massachusetts General Laws, and based upon discussions with Keolis, please see below for responses to the questions posed in Attachment A of your letter.

While the majority of South Coast Rail trips have occurred as planned and on time, we know that there have been several instances in which shuttle service had to replace train service. This is entirely unacceptable, and we have made that clear to Keolis. Keolis provided assurances to the MBTA prior to the start of service that a sufficient number of trained operators would be available, and that Keolis would provide the level of service our riders deserve. Keolis has fallen short on that promise, and the MBTA intends to hold Keolis accountable.

1. *How many conductors and locomotive engineers were trained and fully qualified to safely operate on the Fall River/New Bedford line on March 24, 2025?*

Response:

Locomotive Engineers	Managers of Locomotive Engineers	Conductors	Managers (who are also certified conductors)
42	3	41	3

2. *How many conductors and locomotive engineers are currently being trained to safely operate on the Fall River/New Bedford line as of April 23, 2025?*

Response:

Locomotive Engineers	Managers of Locomotive Engineers	Conductors	Managers of Conductors
2	1	17	3

3. *On what date did the above-mentioned staff start their current training and when is said training expected to be completed?*

Response:

“Qualification” is a federal safety requirement where Conductors and Locomotive Engineers demonstrate that they have sufficient knowledge of the physical characteristics of the territory to safely operate a train. The process for qualifying Conductors and Locomotive Engineers is ongoing and began on January 6, 2025.

It takes a different amount of time to earn qualifications for different parts of the Commuter Rail network. To operate a train that serves the Fall River/ New Bedford line a Conductor must have qualifications for several territories. The shortest amount of time it could take a Conductor to qualify is approximately two and a half weeks, and for some it could take up to two and a half months depending on their existing qualifications.

Below please find a table reflecting the status of the 17 Conductors who are currently in the process of qualifying as of April 28, 2025.

Employee	Start Date	Projected Completion Date
Conductor 1 *	1/30/2025	5/5/2025
Conductor 2	3/3/2025	4/30/2025
Conductor 3	3/3/2025	5/20/2025
Conductor 4	3/24/2025	6/5/2025
Conductor 5	4/7/2025	5/28/2025
Conductor 6	4/7/2025	6/20/2025
Conductor 7	4/7/2025	6/20/2025
Conductor 8	4/7/2025	6/20/2025
Conductor 9	4/15/2025	6/3/2025
Conductor 10	4/15/2025	4/30/2025
Conductor 11	4/15/2025	5/2/2025
Conductor 12	4/15/2025	4/30/2025
Conductor 13	4/21/2025	5/5/2025
Conductor 14	4/23/2025	5/7/2025
Conductor 15	4/23/2025	5/7/2025
Conductor 16	4/25/2025	5/7/2025
Conductor 17	4/25/2025	5/12/2025

*qualifying for entire South Side

Employee	Start Date	Projected Completion Date
Engineer 1	4/28/2025	5/14/2025
Engineer 2	4/28/2025	5/14/2025

4. *How many conductors and locomotive engineers are required to safely operate weekend service on the Fall River/New Bedford line pursuant to the publicly-posted schedule entitled "Spring/Summer Schedule Effective March 24, 2025"?*

Response:

The Fall River/ New Bedford Line weekend service requires 11 qualified Conductors and 11 qualified Locomotive Engineers for each Saturday and Sunday.

5. *How many conductors and locomotive engineers who are trained and fully qualified to safely operate on the Fall River/New Bedford line were scheduled to operate weekend service on the following dates:*
- *Saturday, March 29, 2025*
 - *Sunday, March 30, 2025*
 - *Saturday, April 5, 2025*
 - *Sunday, April 6, 2025*
 - *Saturday, April 12, 2025*
 - *Sunday, April 13, 2025*
 - *Saturday, April 19, 2025*

Response:

Every Fall River/New Bedford trip has an assigned Conductor. Due to the union job bidding and selection process, some of these Conductors who hold jobs on the Fall River / New Bedford line are not yet qualified and the job is "functionally vacant" until they complete their qualifications.

To cover these or any other vacancies (including vacation or illness), Keolis relies on a pre-designated list of Conductors who cover that work. Once those Conductors are assigned, the service relies on qualified Conductors willing to take overtime shifts to cover any remaining work. Conductors taking overtime shifts can work partial shifts per their availability. Keolis may direct crews who are assigned to other work to cover these roles. (Some train crews are assigned to support routine maintenance work.) The number of crew members available to be pulled off of existing work is highly variable weekend to weekend.

Relying on overtime to cover weekend work is standard practice in the railroad industry and a common practice across the Commuter Rail. As part of the preparation for South Coast Rail, Keolis understood that it would take a considerable amount of time to qualify Conductors for Fall River/New Bedford trips, and that weekend coverage in particular would be difficult. That was why Keolis

focused on qualifying Conductors to be part of a buffer pool who could work overtime on the weekends until the process of qualifying the Conductors who are on the Fall River/ New Bedford Line was completed.

Below is a table showing, for the weekend days referenced, how many Conductors worked as scheduled, how many conductors were pulled from other work, how many Conductors were available to work overtime, and how many did, and how many trains were cancelled due to a lack of qualified crew.

Date	Conductors Working as Scheduled	Conductors who were pulled from other work	Buffer Pool (Conductors who could work overtime)	Conductors who worked overtime (including partial shifts)	# of Fall River/ New Bedford Trains Not Operated
Saturday 3/29	5	4	14	2 (1 partial shift, 1 full shift)	0
Sunday 3/30	4	3	14	4 (4 partial shifts)	2
Saturday 4/5	3	4	11	6 (4 partial shifts, 2 full shifts)	1
Sunday 4/6	4	4	13	5 (2 partial shifts, 3 full shifts)	0
Saturday 4/12	2	6	<u>12</u>	5 (5 partial shifts)	0
Sunday 4/13	3	4	17	2 (2 partial shifts)	9
*Saturday 4/19	1	4	12	5	9
*Sunday 4/20	3	4	11	9 (2 partial shifts, 7 full shifts)	10

*Saturday and Sunday 4/19 and 4/20 Keolis and the MBTA announced that 10 trips each day would be replaced with shuttle bus service. On Saturday April 19th we were able to run one of the 10 trips for a total of 9 trips replaced with shuttle buses.

Date	Engineers Working as Scheduled	Engineers who were pulled from other work	Buffer Pool (Engineers who could work overtime)	Engineers who worked overtime	# of Fall River/ New Bedford Trains Not Operated**
Saturday 3/29	6	5	18	0	0
Sunday 3/30	5	5	19	1	2
Saturday 4/5	6	5	17	0	1
Sunday 4/6	6	4	21	1	0
Saturday 4/12	7	2	19	2	0
Sunday 4/13	6	5	18	0	9
*Saturday 4/19	6	5	18	0	9
*Sunday 4/20	7	3	16	1	10

*Saturday and Sunday 4/19 and 4/20 Keolis and the MBTA announced that 10 trips each day would be replaced with shuttle bus service. On Saturday April 19th we were able to run one of the 10 trips for a total of 9 trips replaced with shuttle buses.

**None of the Fall River/New Bedford trains not operated on these dates were due to locomotive engineer availability.

6. *How many qualified conductors and locomotive engineers were unavailable to operate during the days listed above due to illness or otherwise?*

Response:

Conductors

Date	Absent	Absence Reason
Saturday, 3/29	0	n/a
Sunday, 3/30	1	Intermittent FMLA (1)
Sunday, 4/5	2	Intermittent FMLA (1) Other Leave (1)

Sunday, 4/6	1	Other Leave (1)
Saturday, 4/12	2	Intermittent FMLA (1) Vacation (1)
Sunday, 4/13	1	Intermittent FMLA (1)
Saturday, 4/19	4	FRA-Required Relief Day (2) Unexcused Absence (1) Vacation (1)
Sunday, 4/20	1	Vacation (1)

Engineers

Date	Absent	Absence Reason
Saturday, 3/29	1	Vacation (1)
Sunday, 3/30	2	Vacation (1) Sick (1)
Saturday, 4/5	1	Sick (1)
Sunday, 4/6	0	
Saturday, 4/12	0	
Sunday, 4/13	1	FRA-Required Relief Day (1)
Saturday, 4/19	2	Vacation (1) Out of Service (1)
Sunday, 4/20	3	Vacation (1) Out of Service (1) Sick (1)

7. What process and incentives, if any, are utilized to fill a vacant shift?

Response:

When a job is vacant on a temporary basis, for example the Conductor is taking a planned vacation, or they are completing their qualifications, Keolis will work according to union rules to cover the work.

First, Keolis looks to a pre-designated list of Conductors who are assigned to cover vacancies. Once those Conductors are assigned, the service relies on qualified Conductors willing to work overtime shifts to cover any remaining work.

Keolis offers financial incentives to Conductors who work overtime. Qualified Conductors can individually negotiate their overtime work. However, as a minimum Conductors are paid time and a half.

Keolis is currently at the table with the Conductor's union to identify and implement solutions to fill vacancies and improve weekend coverage.

8. When will the weekend commuter rail service fully resume with adequate, qualified staff to safely operate the Fall River/New Bedford line?

Response:

The situation improves each week. As the buffer pool of qualified staff grows, and as Conductors who are scheduled to work Fall River/ New Bedford Line weekend jobs complete their qualifications, the risk of cancellation due to crew availability shrinks.

With the support of the Conductors Union, all overtime shifts were covered for the weekend of April 26th and 27th, and Keolis was able to deliver the full Fall River/New Bedford Service.

9. A listing of every scheduled train on the Fall River/New Bedford line since March 24, 2025 that was either cancelled or incurred a delay of at least 10 minutes or more?

Response:

See attached Excel file with responsive data.

10. An exact count of how many passengers have been left stranded by cancelled service?

Response:

Following a review of available customer service data, we estimate fewer than 15 people.

It is never acceptable to leave any number of passengers without access to train service. The MBTA and our commuter rail operator, Keolis, apologize to every passenger who had a negative experience. Keolis is actively undertaking efforts to qualify all south side conductors and engineers,

as well as managers, to ensure weekend train crew coverage for the Fall River and New Bedford lines as soon as possible. In addition, Keolis is providing local and express bus service to replace all Fall River/New Bedford weekend trains not operated due to crew availability until the crew coverage issue is resolved. We will continue working with Keolis to deliver the reliable service that the South Coast Rail communities deserve.

11. What is the current emergency plan or procedure for providing passengers with alternative transit following a cancellation?

Response:

Keolis maintains a formal service-contingency plan to assist passengers when a train must be canceled. Under this plan, Keolis immediately activates alternate-transit procedures and customer notifications and when possible, launches a shuttle-bus strategy in partnership with a private bus operator.

Customer notifications:

- Station staff announcements
- In station public-address announcements
- MBTA's "T Alerts" system delivers targeted text or email notices
- Official Commuter Rail social media accounts provide real-time updates

The MBTA website and mobile app are also updated with service advisories as soon as a cancellation is confirmed. Riders are encouraged to subscribe to these alerts and follow the MBTA's Commuter Rail accounts on X (formerly Twitter) for immediate information about delays and replacement service.

When a train is canceled, a decision is made based upon the timing of the cancellation and the next available service as to whether customers will be advised to utilize the next scheduled train or if shuttle buses will be deployed to provide alternative service. These shuttles either follow the train schedule or run as needed to accommodate passenger volumes. This service is often delivered by a private bus operator. All alternate buses are ADA accessible and Keolis staff on site help direct customers onto the correct bus. Fare rules follow the MBTA policy (shuttle trips are typically treated as free passes onto regular bus or subway service if transfers are involved).

Keolis's plan is designed for a rapid response. Once a train cancellation is confirmed, Keolis dispatchers immediately notify its bus vendors if a rescue train isn't available. In general, the goal is to have shuttle buses en route to affected stations within about 30 minutes of confirmation, and to begin carrying passengers within roughly an hour of the cancellation. This timeline can vary with factors like time of day or location, but the emphasis is on speedy relief. To further ensure customer safety, Uber or taxi may be utilized when needed at no expense to the passenger if bus options are not available. Keolis strives to minimize passenger inconvenience during disruptions.

12. Pursuant to the MBTA's contract with Keolis, how are fines calculated, determined, or otherwise issued to Keolis for service disruptions?

Response:

The mechanism for performance penalties is outlined in the MBTA-KCS Commuter Rail Operating Agreement. All trains that are late by more than 4 minutes and 59 seconds, or are cancelled or terminated, are individually penalized, with some exemptions for circumstances that were beyond Keolis' control.

13. Pursuant to the MBTA's contract with Keolis, what level of funding is provided to Keolis to staff the Fall River/New Bedford line and how many staff does said funding support?

Response:

Keolis has the correct number of Conductors and Locomotive Engineers to safely operate the Commuter Rail service.

The operating agreement between the MBTA and Keolis funds all staff required to deliver the scheduled service. When the scope of that service changes substantially Keolis and the MBTA negotiate a service change agreement. That agreement is still being finalized for South Coast Rail.

The Fall River/New Bedford service requires 23 Locomotive Engineers and 22 Conductors, many of whom were already part of operating the Middleborough service. As part of the preparations for South Coast Rail, Keolis was reimbursed for the cost of hiring and training 9 Locomotive Engineers and 6 Conductors who would be needed to supplement the existing workforce to operate the new Fall River / New Bedford Service.

14. Pursuant to the MBTA's contract with Keolis, what incentives are in place to ensure adequate staffing and service on the Fall River/New Bedford line?

Response:

The MBTA's contract with Keolis has penalties and incentives for staffing levels based on the length of the train. Keolis is incentivized to provide more staff than required and penalized for providing less. The total value of the potential penalties and incentives for the South Coast Rail service are currently being determined by the MBTA and Keolis.

15. When and how did Keolis confirm its readiness to operate the Fall River/Bedford line, including adequate staff, prior to March 24, 2025?

Response:

In the months leading up to the announcement of the March 24th start date and through the start of service, there were regular meetings, both formal South Coast Rail Project meetings, and more routine operational meetings between Keolis and the MBTA's Railroad Operations and Capital Delivery Departments where preparedness, progress, status, delays and risks were discussed.

Keolis did provide and update a qualification dashboard that was shared with the MBTA, and which reflected the status of qualifications. The dashboard as of March 21, 2025 (below) illustrated the planned 41 qualified Conductors had been achieved.

Qualifications Scorecard

Updated on 3/21/25



*Based on a 7-day Training Period

Week Ending	Engineer Plan	Engineer Actual	Conductor Plan	Conductor Actual
Jan 11 th	-	-	-	-
Jan 18 th	4	10	4	8
Jan 25 th	8	13	8	10
Feb 1 st	12	19	12	10
Feb 8 th	16	19	16	10
Feb 15 th	20	24	20	16
Feb 22 nd	24	24	24	16
Mar 1 st	28	29	28	23
Mar 8 th	32	31	32	29
Mar 15 th	36	41	36	35
Mar 22 nd	40	42	41	41

Managers Qualified; in addition to numbers on table.

Engineers – 3
Conductors – 3

Assignment Breakdown

Locomotive Engineers
22 Running Assignments
2 Protect Assignments (Middleboro)
10 House Jobs
6 Old Colony Spare Board
40 Total

Conductors
23 Running Assignments
2 Protect Assignments (Middleboro)
10 House Jobs
6 Old Colony Spare Board
41 Total

In progress:

Engineers – 5
Conductors – 1

MLE – 1

3/21/2025



5

Thank you for your attention to this issue, and as always, I am available to meet and discuss this or any other matter further.

Sincerely,

Phillip Eng
General Manager & CEO