July 6, 2016

Honorable Andrew M. Cuomo  
Governor of New York State  
NYS State Capitol Building  
Albany, NY 12224

Honorable Thomas P. DiNapoli  
Office of the State Comptroller  
59 Maiden Lane, 31st Floor  
New York, NY 10038

RE: Response to Report #2014-S-23 – Subway Wait Assessment

Gentlemen:

On April 6, 2016, the Office of the State Comptroller issued the above referenced audit report. As required by Section 170 of the Executive Law, I am providing you with the attached response which addresses the recommendations contained in the report.

A copy of the final audit report is attached for your convenience.

Sincerely,

[Signature]

Thomas F. Prendergast  
Chairman and Chief Executive Officer

Attachment

c:  Donna M. Evans, MTA Chief of Staff
NYCT RESPONSES TO THE NYSC SUBWAY WAIT ASSESSMENT AUDIT

I. RESPONSE TO THE SPECIFIC RECOMMENDATIONS MADE IN THE REPORT

Comptroller Recommendation #1: Disclose pertinent details of statistical projection methodologies, including the confidence and error precision levels, when publishing wait time performance data.

NYCT Response – NYCT continues to disagree with this recommendation. Providing statistical analysis on a monthly basis will lead to more confusion and lengthier meetings. This recommendation does not add value to the monthly New York City Transit Committee meetings nor does it contribute to the long-term NYCT plan to address performance issues. A more detailed discussion of this issue is included in our original response dated December 30, 2015.

Comptroller Recommendation #2: Formally assess and revise as necessary the methodologies used to calculate and report wait time performance data. Appropriately weight the performance statistics of the various lines and shuttles and promote full and transparent disclosure of such data.

NYCT Response – NYCT continues to disagree with this recommendation under the current data collection and analytical framework for Wait Assessment. Because of the combination of a 100% sample through electronic data collection on some lines (1 – 6) and sampling on other lines, weighting by service levels (i.e. frequency of service) is unwieldy and not statistically valid. As NYCT transitions towards electronic data collection systemwide, weighting of WA by service frequency will occur.

Comptroller Recommendation #3: Develop a comprehensive and detailed long-term plan to address the reasons wait assessment performance has decreased. Such a plan should include the structural and information technology improvements that are needed, as well as timeframes and cost estimates to make the required improvements.

NYCT Response – NYCT continues to disagree with the assertions that New York City Transit lacks an understanding of the reasons for declining Wait Assessment and does not have a plan in place to improve Wait Assessment, as explained in detail in our December 30, 2015 response. In addition, it should be noted that the 12-Month Rolling Average Systemwide Wait Assessment has been improving in recent months. For the period ending April 2016, which is the latest available, Wait Assessment is at its highest level in the last nine periods. This is a reflection of our dedicated focus and comprehensive planning efforts to improve service reliability in the face of challenges, including crowding and ridership growth and a high level of ongoing maintenance needs.
Comptroller Recommendation #4: Formally assess and revise as necessary the minimum frequency guidelines to address days (particularly the weekends) and hours not covered by specific standards.

NYCT Response – NYCT continues to disagree with this recommendation. NYCT routinely reviews traffic checks at peak load points and other locations and the service levels on all lines to ensure that the Rapid Transit Loading Guidelines are met, where feasible. NYCT is developing a Policy/Instruction to address perceived ambiguities in the Guidelines regarding policy headways in subway timetables. Development of this P/I is in the preliminary stages and is expected to be completed by the end of 2016.

Comptroller Recommendation #5: Develop and implement a process whereby real-time data obtained by traffic checkers is used to advise patrons of delays and potential alternative lines to help alleviate congestion.

NYCT Response – NYCT continues to disagree with this recommendation. Given that the traffic checker data collection effort is currently staffed by 10 Traffic Checkers for the B-Division, providing real-time traffic checker data is not practical as the data set would be too small for customer usage.