



U.S. Department of Justice

Civil Rights Division

Disability Rights Section - NYA  
950 Pennsylvania Ave, NW  
Washington, DC 20530

June 9, 2015

**VIA U.S. AND ELECTRONIC MAIL**

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President and Chief Executive Officer  
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60 Massachusetts Avenue, N.E.  
Washington, DC 20002

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**Re: The United States' Findings and Conclusions Based on its Investigation under Title II of the Americans with Disabilities Act of the National Railroad Passenger Corporation, DJ No. 204-16-128**

Dear Mr. Boardman, Ms. Estevez, and Ms. Joseph:

The United States Department of Justice (Department) makes the following findings and conclusions based on its investigation of the National Railroad Passenger Corporation (Amtrak) for compliance with Title II of the Americans with Disabilities Act of 1990 (ADA), as amended, 42 U.S.C. §§ 12131-12134, 12161-12165; the Department's regulation implementing the ADA, 42 U.S.C. § 12134; *see* 28 C.F.R. Part 35; and the Department of Transportation's (DOT) regulations implementing the ADA, 42 U.S.C. § 12164; *see* 49 C.F.R. Parts 37 and 38. The Department is authorized to investigate compliance with the ADA and issue findings under these regulations implementing the ADA. 42 U.S.C. § 12133; 28 C.F.R. §§ 35.172, .190(e); 49 C.F.R. § 37.11(b).

The ADA and its regulations impose a broad nondiscrimination mandate that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of services, programs, or activities of a public entity, or be subjected to discrimination by a public entity. 42 U.S.C. § 12132; 28 C.F.R. § 35.130(a). Amtrak is a public entity subject to the ADA and its regulations. *See* 42 U.S.C. § 12131(1)(C); 28 C.F.R. § 35.104. The ADA and its regulations prohibit Amtrak from discriminating against individuals with disabilities when providing transportation services. 42 U.S.C. §§ 12161(3), 12162; 49 C.F.R. §§ 37.3, .5.

The ADA required Amtrak to make all existing intercity rail station facilities, for which Amtrak is responsible, readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, by July 26, 2010. 42 U.S.C. § 12162(e)(2)(A)(ii)(I). Station facilities include the station structure, the platform, and any parking facility. To date, Amtrak has failed to comply with this statutory mandate and is in violation of the ADA.

The Department is authorized to file a civil action in federal court if the Attorney General finds a violation of the ADA. 42 U.S.C. § 12133; 28 C.F.R. Part 35, Subpart F. The Department undertook an extensive review of Amtrak's internal and public documentation to assess Amtrak's compliance with the ADA and the ADA regulations, especially as it relates to the key requirement of making all intercity rail station facilities readily accessible. The Department reviewed Amtrak's own annual reports and its ADA updates required by Congress, as well as reports on accessibility from Amtrak's Office of the Inspector General, oversight documents in the possession of DOT<sup>1</sup>, and over five thousand pages of responsive documents in 15 submissions from Amtrak to the Department. We also reviewed complaints to Amtrak and the Department related to station facility accessibility, including a comprehensive complaint and report from the National Disability Rights Network.

The Department finds that Amtrak has discriminated against persons with disabilities in violation of the ADA by failing to make existing station facilities in its intercity rail transportation system, for which it is responsible, accessible. It has also violated the ADA by incorrectly classifying stations as "flag stop" stations and thereby avoiding responsibility to make those station facilities accessible. In order to resolve this matter, a court-enforceable agreement is necessary to address the Department's findings.

This letter constitutes notice of the Department's findings of fact and conclusions of law that Amtrak has failed to comply with the ADA and its regulations, and of the remediation that Amtrak must undertake to address violations and bring its policies, practices, and procedures into compliance with the ADA. *See* 28 C.F.R. Part 35, Subpart F.<sup>2</sup>

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<sup>1</sup> DOT is the agency also designated under the ADA to investigate programs, services, and regulatory activities relating to transportation. 42 U.S.C. § 12133; 28 C.F.R. § 35.190(b)(8). DOT's sub-agency, the Federal Railroad Administration (FRA), oversees Amtrak and administers federal financial assistance to Amtrak. FRA is tasked with overseeing Amtrak's capital projects and reviewing Amtrak's compliance with the ADA. The Title II ADA regulation authorizes the Department of Justice to retain jurisdiction to investigate complaints, and the Department has exercised that authority here. *See* 28 C.F.R. Part 35, Subpart F.

<sup>2</sup> Amtrak has been on notice of the Department's investigation. In 2013, the Department met with Amtrak and FRA to discuss the accessibility of Amtrak's programs, services, and activities. Amtrak expressed its willingness to identify and make station facilities for which it is responsible ADA compliant. During these meetings, Department staff informed Amtrak that it appeared to have failed to meet its obligation to be fully accessible to persons with disabilities by July 2010, in violation of the ADA.

## I. STATUTORY AND REGULATORY BACKGROUND

Congress enacted the ADA in 1990 “to provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” 42 U.S.C. § 12101(b)(1). In so doing, Congress found that “physical or mental disabilities in no way diminish a person’s right to fully participate in all aspects of society, yet many people with physical or mental disabilities have been precluded from doing so because of discrimination.” *Id.* § 12101(a)(1). Congress further found that “discrimination against individuals with disabilities persists in such critical areas as . . . transportation . . .” and that the forms of discrimination encountered by individuals with disabilities include “the discriminatory effects of architectural, transportation, and communication barriers” and “failure to make modifications to existing facilities and practices.” *Id.* § 12101(a)(3), (5).

Under the ADA, Amtrak is defined as a public entity and the provider of intercity rail transportation. 42 U.S.C. §§ 12131(1)(C), 12161(3); 49 C.F.R. § 37.3. The ADA requires that all new station facilities for use in intercity rail transportation be built to be accessible, 42 U.S.C. § 12162(e)(1), and that all existing station facilities be made accessible no later than July 26, 2010—twenty years after the signing of the ADA. 42 U.S.C. § 12162(e)(2)(A)(ii)(I); 49 C.F.R. § 37.55. The obligation to make existing station facilities accessible falls to the “responsible person” under the statute. 42 U.S.C. § 12162(e)(2)(A)(i).

Whether Amtrak as a public entity is the responsible person for making a particular station facility accessible depends on the ownership of that station facility. First, if a station facility is more than 50 percent owned by a public entity, such as Amtrak or a local government, then that public entity is the “responsible person” that must make the station facility accessible. 42 U.S.C. § 12161(5)(A); 49 C.F.R. § 37.49(b). Therefore, Amtrak is the responsible person for station facilities of which it owns more than 50 percent and local public entities are the responsible persons for station facilities of which they own more than 50 percent.

Second, if a station facility is more than 50 percent owned by a private entity, such as a freight company, then the entities providing intercity and commuter rail transportation to the station are the responsible persons, in proportion to the percentage of their passengers boarding at the station.<sup>3</sup> 42 U.S.C. § 12161(5)(B); 49 C.F.R. § 37.49(c), (e). At most intercity rail stations only Amtrak provides rail transportation and therefore Amtrak is the responsible person to make the station facilities owned by private entities accessible.

Third, if no public or private entity owns more than 50 percent of a station facility, then responsibility is divided between the entities providing intercity and commuter rail transportation and any public owners of the station facility. 42 U.S.C. § 12161(5)(C); 49 C.F.R. § 37.49(d), (e).

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<sup>3</sup> This allocation of responsibility between the intercity and commuter rail transportation providers may differ by agreement. 42 U.S.C. § 12161(5)(A); 49 C.F.R. § 37.49(e). Furthermore, an owner or entity in control of an intercity station facility that is not the responsible person for ADA compliance must nonetheless provide reasonable cooperation with the responsible person to allow the station facility to be made accessible. *See* 42 U.S.C. § 12162(e)(2)(C); 49 C.F.R. § 37.57.

The Department has determined that, of the 482 stations served by Amtrak, Amtrak is the responsible person for ADA compliance for facilities at 376 of those stations, as identified in Appendix A.

The DOT ADA regulation reflects the ADA's broad nondiscrimination mandate. 42 U.S.C. § 12164; *see* 49 C.F.R. Part 37. Beyond station accessibility, Amtrak's ADA obligations include the following:

- (1) Maintaining in operative condition those features of facilities and vehicles that are required to make the vehicles and facilities readily accessible to and usable by individuals with disabilities. These features include, but are not limited to, lifts and other means of access to vehicles, elevators, signage, and systems to facilitate communications with persons with impaired vision or hearing; 49 C.F.R. § 37.161(a);
- (2) Promptly repairing these accessibility features if they are damaged or out of order, and taking reasonable steps to accommodate individuals with disabilities who would otherwise use an accessibility feature when it is out of order; 49 C.F.R. § 37.161(b);
- (3) Announcing stops at least at transfer points with other fixed routes, other major intersections and destination points, and intervals along a route sufficient to permit individuals with visual impairments or other disabilities to be oriented to their location; 49 C.F.R. § 37.167 (b);
- (4) Providing a means by which an individual with a visual impairment or other disability can identify the proper vehicle to enter or be identified to the vehicle operator as a person seeking a ride on a particular route where vehicles or other conveyances for more than one route serve the same stop; 49 C.F.R. § 37.167(c);
- (5) Permitting service animals to accompany individuals with disabilities in vehicles and facilities; 49 C.F.R. § 37.167(d);
- (6) Ensuring that vehicle operators and other personnel make use of accessibility-related equipment or features required by 49 C.F.R. Part 38 (which provides accessibility specifications for transportation vehicles); 49 C.F.R. § 37.167(e);
- (7) Making available to individuals with disabilities adequate information concerning transportation services. This obligation includes making adequate communications capacity available, through accessible formats and technology, to enable users to obtain information and schedule service; 49 C.F.R. § 37.167(f);
- (8) Permitting a passenger who uses a lift to disembark from a vehicle at any designated stop, unless the lift cannot be deployed, the lift will be damaged if it is deployed, or if temporary conditions at the stop, not under the control of the entity, preclude the safe use of the stop by all passengers; 49 C.F.R. § 37.167(g);
- (9) Allowing adequate time to allow individuals with disabilities to complete boarding or disembarking from the vehicle; 49 C.F.R § 37.167(i); and

- (10) Ensuring that personnel are trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a respectful and courteous way, with appropriate attention to the differences among individuals with disabilities; 49 C.F.R. § 37.173.

## II. STATION INACCESSIBILITY

Amtrak has failed to comply with the ADA. Amtrak's own reports and updates to Congress, documentation that Amtrak provided to the Department, Amtrak's Office of Inspector General's reports, documentation from DOT, and complaints received by Amtrak and by the Department from people with disabilities clearly reveal that Amtrak has failed to make station facilities, for which it is responsible, accessible to persons with disabilities.

The Passenger Rail Investment and Improvement Act of 2008 (PRIIA), P.L. 110-432, requires Amtrak to report to Congress the improvements required to make each applicable station accessible, any barriers to achieving this accessibility, the estimated cost of this work, and when the work would be completed. FRA is tasked with overseeing Amtrak's capital projects and PRIIA requires FRA to monitor Amtrak's compliance with the ADA.<sup>4</sup> On June 30, 2010, FRA requested that Volpe, a component of DOT, provide technical oversight of Amtrak's ADA compliance program.<sup>5</sup>

### A. Amtrak's Annual ADA Reports to Congress Show that the Overwhelming Majority of its Stations are Inaccessible

#### 1. Amtrak's 2010 ADA Report to Congress

Amtrak's plan for ADA station compliance is its Accessible Stations Development Program (ASDP). On October 27, 2010, Amtrak discussed its ASDP in its ADA compliance report to Congress (2010 ADA report) and at that time projected full ADA station compliance by September 30, 2015.<sup>6</sup> Amtrak inaccurately projected to Congress that by the end of 2011 it would fulfill its ADA obligations at more than 100 stations. Amtrak's implementation of the ASDP, however, has resulted in only 18 stations reported to be ADA compliant as of April 1, 2015.<sup>7</sup>

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<sup>4</sup> See 29 U.S.C. § 794; 28 C.F.R. § 35.190(b)(8); 49 C.F.R. Part 27, Subpart C; P.L. 110-432, Division B, Section 220.

<sup>5</sup> Part of DOT, Volpe is a fee-for-service research and innovation center funded by sponsor projects. See 49 U.S.C. § 328.

<sup>6</sup> Amtrak, *Intercity Rail Stations Served by Amtrak, An Update on Accessibility and Compliance with the Americans With Disabilities Act of 1990*, at 1 (October 27, 2010), available at <http://tinyurl.com/2010ADARReport> (last visited June 9, 2015). This was Amtrak's second such report as required by PRIIA. The first report, dated February 1, 2009, predates the July 2010 deadline and therefore we focus our review on the reports starting in 2010.

<sup>7</sup> Amtrak, *Amtrak ASDP Program Statistics Period Ending March 31, 2015* (Apr. 1, 2015).

At the time of the 2010 ADA Report, Amtrak reported that it had some ADA responsibility for the following station facilities: 236 station structures, 405 platforms, and 211 parking facilities. The Department’s own determination, based on the criteria outlined in DOT’s ADA regulations, is that Amtrak’s self-assessment does not accurately capture the scope of Amtrak’s responsibility. In some instances Amtrak has assigned responsibility for facilities to local entities when Amtrak is the responsible person. In others, Amtrak has taken responsibility for facilities for which it is not the responsible person. Collectively, Amtrak’s responsibility is slightly narrower than the number of facilities identified by Amtrak. *See Appendix A.*

## 2. Amtrak’s 2011 ADA Report to Congress

In August 2011, Amtrak provided its next ADA compliance report to Congress (2011 ADA Report).<sup>8</sup> In that report, Amtrak described steps that it had taken through its Mobility First Program, which was a program designed to address the immediate need for access to Amtrak trains for those passengers who require the use of wheelchairs or who have reduced mobility. According to the report, as part of the Mobility First Program, Amtrak deployed wheelchair lifts as an interim step to achieving ADA compliance. Amtrak reported that 231 new lifts were to be used at 193 station platforms that were not wheelchair accessible or that required a second lift. In that report Amtrak also updated the status of its ASDP and confirmed that the majority of its stations were not ADA compliant. At that time, Amtrak took responsibility for at least one facility at 398<sup>9</sup> of its 482 covered stations and said it would focus its ADA efforts on 104 stations for which it has sole compliance responsibility. Amtrak’s revised ASDP plan listed what was done in 2011 and projected a timetable for achieving accessibility at those 398 stations, identifying 2015 as the planned completion date:

ASDP Plan – Stations		
FY	In Design	Under Construction
2011	100	0
2012	110	110
2013	100	105
2014	88	105
2015	0	78
Total	398	398

## 3. Amtrak’s 2012 ADA Reports to Congress

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<sup>8</sup> Amtrak, *Intercity Rail Stations Served by Amtrak: An Update on Accessibility and Compliance with the Americans With Disabilities Act of 1990* (Aug. 2011), available at: <http://www.amtrak.com/ccurl/889/574/ADA%20Report%20AUG%202011.pdf> (last visited on June 9, 2015).

<sup>9</sup> Amtrak’s calculation in 2011, that it bears responsibility for facilities at 398 stations, is slightly more than the 376 stations that the Department has currently determined that Amtrak bears responsibility based on DOT’s ADA regulations. *See Appendix A.*

Amtrak did not meet the projections that it made in the 2011 ADA Report. Amtrak issued two updates to Congress in 2012, on May 11 and August 7.<sup>10</sup> Both reports blamed DOT's "platform rule," effective October 19, 2011, as the reason for not bringing more stations into ADA compliance and for Amtrak's suspension of its ASDP. *See* 49 CFR 37.42. DOT's platform rule requires level-entry boarding at stations with no active freight rail operations when the station platform is altered after February 1, 2012. Further, for stations that share tracks with freight rail operations, means of equal access must be by level-entry boarding, car-borne lifts, or one of several means approved by DOT. Amtrak also projected that it would make only 19 stations accessible by 2013.

#### 4. Amtrak's 2013 ADA Report to Congress

On October 11, 2013, Amtrak submitted its next report to Congress (2013 ADA Report).<sup>11</sup> This report detailed its current shortcomings in the ASDP, specifying that a number of projections were not met due to budget constraints, funding limitations, and the complexity of determining station facility ownership and responsibility. Amtrak's 2013 ADA Report for the first time failed to provide the number of stations brought into ADA compliance.

##### B. Amtrak's Office of Inspector General Reports Confirm Amtrak's Vast Station Inaccessibility

Amtrak has an Office of Inspector General (OIG) that oversees Amtrak's operations by conducting audits and investigations; detecting fraud, waste, and abuse; and providing reports to Congress, Amtrak, and the public. Since July 2010, Amtrak's OIG has released two Audit Reports related to station accessibility. The first Audit Report, released in September 2011, found that Amtrak had made limited progress in meeting the ADA's requirement.<sup>12</sup> That report concluded that, according to Amtrak, as of October 31, 2010, only 48 of 482 stations Amtrak served were ADA compliant.<sup>13</sup>

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<sup>10</sup> Amtrak, *Update to Accessibility and Compliance with the Americans with Disabilities Act of 1990*, May 11, 2012, available at <http://www.amtrak.com/ccurl/83/1005/ADA-Accessibility-Compliance-Report-May2012.pdf> (last visited on June 9, 2015); *Update to Congress on Amtrak Accessible Stations Development Program*, Aug. 7, 2012, available at: <http://www.amtrak.com/ccurl/14/262/Congressional-Report-ASDP-Aug2012.pdf> (last visited on June 9, 2015).

<sup>11</sup> Amtrak, *Update to Congress on Amtrak Accessible Stations Development Program*, Oct. 11, 2013, available at <http://www.amtrak.com/ccurl/937/861/ADA-Update-to-Congress-October-2013.pdf> (last visited on June 9, 2015).

<sup>12</sup> Americans with Disabilities Act: Leadership Needed to Help Ensure That Stations Served By Amtrak Are Compliant. Amtrak Office of Inspector General. Report No. 109-2010. Sept. 29, 2011.

<sup>13</sup> The validity of this number is unclear, and it conflicts with other station counts available at that time. All sources agree, however, that Amtrak did not meet its July 2010 obligation to ensure the accessibility of all station facilities for which it is responsible.

In August 2014, Amtrak's OIG released a second Audit Report finding inaccessibility similar to that identified in the first OIG report.<sup>14</sup> That report found that Amtrak completed 176 ADA surveys and 71 facility ADA assessments, and spent over \$20 million on 19 construction projects, but only made three more stations ADA compliant. The report also specifically identified 17 Amtrak stations with no access to the train for passengers who use wheeled mobility devices and 55 Amtrak stations where restrooms are inaccessible.

### C. Reports from Volpe Establish that Most Amtrak Stations are Inaccessible

In June 2013, based on Amtrak's reporting, Volpe informed FRA that Amtrak's ASDP, originally a five-year plan, would instead be much longer and cost \$2 Billion. Volpe's report based on Amtrak's data confirmed that there were 397 stations located in 46 states that were inaccessible and required ADA remediation. At that time, Volpe reported that Amtrak planned to make ADA modifications to stations over 15 years as follows:

- FY2014 – 43 stations
- FY2015 – 37 stations
- FY2016 – 32 stations
- FY2017 – 19 stations
- FY2018 – 16 stations
- FY2019 – 24 stations
- FY2020 – 28 stations
- FY2021 – 22 stations
- FY2022 – 23 stations
- FY2023 – 18 stations
- FY2024 – 25 stations
- FY2025 – 18 stations
- FY2026 – 19 stations
- FY2027 – 15 stations
- FY2028 – 14 stations

In total, Amtrak's ASDP compliance plan covered only 371 of the 397 inaccessible stations and Volpe stated that Amtrak did not report having an estimated completion date for the remaining 26 inaccessible stations.

Monthly, Volpe informs FRA of Amtrak's reporting on its ADA construction projects and schedules. In April 2015, the following was reported by Amtrak to Volpe:<sup>15</sup>

- Number of Stations where ADA Survey is Complete: 333
- Number of Stations where ADA Assessment is Complete: 235

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<sup>14</sup> Amtrak Office of Inspector General. *Train Operations and Business Management: Addressing Management Weaknesses Is Key to Enhancing the Americans with Disabilities Program*. Audit Report OIG-A-2014-010. Aug. 4, 2014.

<sup>15</sup> Amtrak, *Amtrak ASDP Program Statistics Period Ending March 31, 2015* (Apr. 1, 2015).



- Number of Stations where ADA Designs are Complete: 42
- Number of Stations ADA Compliant: 18

Thus, Amtrak has reported that it has brought only 18 stations into ADA compliance out of 398.

D. Complaints Received by Amtrak Confirm that its Stations are Inaccessible, Resulting in Injury and Harm to Passengers with Disabilities

Not surprisingly, passengers with disabilities have been harmed by Amtrak's inaccessible stations. Amtrak provided the Department with passenger complaints received between January 1, 2010, and April 25, 2013 in a 153-page spreadsheet of ADA-coded complaints. The Department focused its review on station facilities for which Amtrak is responsible (*see* Appendix A).

At least 20 complaints to Amtrak raise accessibility concerns about 15 different stations where Amtrak is responsible for the station structure. Details of these complaints are limited, however many are from complainants using wheelchairs who could not access elements of the station structure. Some complain that the station structure is not accessible at all. Others identify specific non-compliant issues, such as lack of a ramp at the entrance, high ticket counters, or inaccessible telephones. Several focus on bathroom inaccessibility, including toilet compartments being too narrow, toilet seats being too low, or a lack of grab bars, and another alleges a lack of accessible parking on the shortest route to the station's entrance.

At least 16 complaints identifying 14 stations allege inaccessibility of the platform and means of boarding or disembarking the train. Several complaints identify platforms with no accessible route to reach them. At least three allege that the station's lift was broken. Three more complainants allege that the station lacked a lift from the platform to the train.

These complaints illustrate the burden placed on passengers by Amtrak's failure to make station facilities readily accessible to and usable by individuals with disabilities in violation of the ADA.

E. Complaints from the National Disability Rights Network and Others Corroborate Amtrak Station Inaccessibility

On October 16, 2013, the National Disability Rights Network (NDRN) released a report, *All Aboard (Except People with Disabilities); Amtrak's 23 Years of ADA Compliance Failure*.<sup>16</sup> NDRN also filed the report as a complaint with the Department, along with the supporting documentation that formed the basis for the report.

NDRN member organizations visited a total of 105 stations; eleven additional stations were visited but not included in the report. As outlined in Appendix A, Amtrak is not responsible for all facilities at all 105 stations. However, our review of the NDRN surveys identified a significant number of accessibility deficiencies in station facilities for which Amtrak is responsible.

At multiple stations, the NDRN documentation shows that no accessible car or van parking was provided due to the following: no accessible parking (2010 ADA Standards for Accessible Design, 28 C.F.R. 35.151, 36 C.F.R. Part 1191, Appendices B and D, § 208)<sup>17</sup>; no access aisles (§ 502.3); lack of demarcated access aisles (§ 502.3); steep slopes and cross slopes (§ 502.4); material that is not stable, firm, and slip resistant (§§ 502.4, 302); lack of parking space identification signs that include the International Symbol of Accessibility (§ 502.6); and inaccessible routes from parking to other site facilities (§§ 206.2.1, 403.4, 303). The routes from parking to numerous station entrances are inaccessible because of the following: lack of an accessible route (§§ 403.4, 303); lack of curb ramps (§§ 403.4, 303); inaccessible curb ramps (§ 406); inaccessible ramps (§ 405); ramps that project into traffic lanes (§ 406.5); steps (§§ 206.4, 206.5); and inaccessible thresholds (§§ 404.2.5, 303.4).

At some station entrances, there is insufficient maneuvering clearance (§ 404.2.4); exterior door hardware mounted too low or that requires tight grasping, pinching, or twisting to operate (§ 404.2.7); lack of International Symbols of Accessibility identifying the accessible entrance (§§ 216.6, 703.7.2.1); lack of directional signage at inaccessible entrances to the accessible entrance (§§ 216.6, 703.5); or objects projecting more than four inches into the circulation path at a height more than 27 inches above the finished floor (§ 307.2). A number of ticket counters are mounted too high (§§ 227.3, 904.4), and some counters project into the circulation path without a cane detectable barrier (§§ 204, 307). The station in Red Wing, Minnesota, lacked a wheelchair lift from the boarding platform to the train.

Reports on toilet rooms show inaccessible door hardware (§§ 206.2.2, 404.2.7, 309.4); doors that swing into the clear floor space of the lavatory (§ 603.2.3); lavatories with inaccessible faucet hardware (§§ 606.4, 309); lack of lavatory knee or toe clearance (§§ 606.2, 306); uninsulated supply and drain pipes (§606.5); lack of accessible toilet compartments (§§ 213.3.1, 604.8.1); and toilet compartments that are too narrow (§ 604.8.1) or that lack

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<sup>16</sup> Available at <http://www.ndrn.org/en/media/releases/507-press-release-disability-group-finds-barriers-to-accessibility-at-95-of-amtrak-stations.html> (last visited on June 9, 2015).

<sup>17</sup> Available at [http://www.ada.gov/2010ADASTandards\\_index.htm](http://www.ada.gov/2010ADASTandards_index.htm) (last visited on June 9, 2015).

compliant grab bars (§§ 604.8.1.5, 609). Finally, numerous items, including mirrors, coat hooks, and paper towel holders, are mounted too high (§§ 213.3.5, 603.3, 308).

The Department has received other complaints of Amtrak stations' inaccessibility, including an accessible route being much longer than the route used by other passengers and Amtrak personnel's inability to operate lifts.

#### F. Amtrak's Incorrectly Identified Flag Stops Stations are also Inaccessible

Finally, in regards to station inaccessibility, the Department has determined that Amtrak has responsibility for additional stations. Amtrak has 25 stations that it lists as "flag stops." A flag stop, according to Amtrak and DOT's implementing regulations, is a historical designation used for stops that regularly do not have passengers either boarding or disembarking. 49 C.F.R. § 37.3. At a flag stop station, a train will not stop unless the train manifest indicates that a passenger has a reservation at that stop. If there is no reservation, the train will approach the flag stop at a slower speed and will stop only if there is a person on the platform. If a passenger on the train wants to disembark at a flag stop, they will inform the conductor who will inform the engineer to stop. In contrast to the historic flag stop, at Amtrak's regularly serviced stations Amtrak will stop the train even if there is no reservation, no request to stop, and no one at the platform. For example, Sanderson, Texas, which is designated as a flag stop station by Amtrak, has an annual ridership of 261 passengers boarding or disembarking. With six stops per week, Sanderson appears to operate as a traditional flag stop station, as defined by DOT.

The designation of a station as a flag stop is important, because DOT's regulations exclude flag stops as stations, "*i.e.*, stations which are not regularly scheduled stops but at which trains will stop to board or detain passengers only on signal or advance notice." *Id.* Therefore, Amtrak has not included these stations in its assessment of compliance and has not made them accessible.

Of the 25 stations designated by Amtrak as flag stops, 17 have trains that pass through twice a day, while the remaining eight have trains that pass through only six times per week. Amtrak does not have daily ridership information, and does not maintain records showing the percentage of times its trains pick up or discharge passengers from these flag stop stations. When assessing average annual ridership for these stations designated as flag stops, though, it appears that Amtrak trains would, in practice, be required to stop at most times they pass through. For example, the annual ridership in FY2013 for the Slidell, Louisiana, station was 7,596 passengers boarding or disembarking.<sup>18</sup> Across the year, that averages over 21 boarding or disembarking passengers a day, and Amtrak trains pass through Slidell only twice per day. While there may be low ridership days, it appears unlikely that there would ever be a day without passengers using the Slidell station. Nine more stations have annual ridership that would result in average daily boarding or disembarking of more than ten passengers per day.

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<sup>18</sup> Amtrak, *Amtrak Sets Ridership Record and Moves the Nation's Economy Forward*, Press Release, Oct. 14, 2013. Available at <http://www.amtrak.com/ccurl/730/658/FY13-Record-Ridership-ATK-13-122.pdf> (last visited on June 9, 2015).

Consequently, the Department finds that some of the 25 stations designated as flag stop stations by Amtrak should, instead, be classified as stations, as defined by DOT, and therefore are required to be accessible by the ADA. Based on the lack of information provided by Amtrak, the Department at this time cannot identify all of the stations that are incorrectly classified as flag stops. Amtrak must properly evaluate the actual utilization of each of these stations and correctly identify which of these 25 are stations, not flag stops. Amtrak must make the inaccessible facilities at these stations, for which Amtrak is responsible, accessible. For station facilities for which Amtrak is not responsible, Amtrak must notify the responsible party.

### **III. REMEDIAL MEASURES**

Amtrak must remedy the violations discussed above, by making changes to its operations including, at a minimum, the following:

- 1) Make all station facilities, for which Amtrak is responsible, as determined by the Department, compliant with the ADA and its implementing regulations. Amtrak must also ensure independent monitoring and verification of all accessibility changes. For station facilities for which Amtrak is not responsible, Amtrak must notify the responsible party of the accessibility requirement.
- 2) Identify which stations are incorrectly classified as flagstop stations and make the inaccessible facilities at those stations for which Amtrak is responsible accessible. For station facilities for which it is not responsible, Amtrak must notify the responsible party of the accessibility requirement.
- 3) Educate employees on the requirements of the ADA, its regulations, and the agreement to resolve these findings.
- 4) Train all personnel to operate vehicles and equipment safely and to properly assist individuals with disabilities in a respectful and courteous way, and hold those personnel failing to do so accountable.
- 5) Pay compensatory damages to persons aggrieved in an appropriate amount for injuries caused by Amtrak's failure to comply with the ADA and its regulations.

### **IV. CONCLUSION**

The Department is committed to working with Amtrak to find a resolution to its non-compliance with the ADA and to resolve the Department's findings. Please contact David Knight at (202) 616-2110 or david.knight@usdoj.gov or Felicia Sadler at (202) 353-2289 or felicia.sadler@usdoj.gov within 14 days to confirm that you are interested in working cooperatively with the Department to resolve this matter. In the event we determine that we cannot resolve this matter to correct the deficiencies identified in this letter, the Attorney General

may initiate a lawsuit pursuant to the ADA. *See* 42 U.S.C. § 12133; 42 U.S.C. § 2000d-1. The Department remains committed to resolving this matter by working cooperatively with Amtrak to negotiate a court-enforceable agreement that brings Amtrak into compliance with the ADA, assures the above-cited violations are resolved, and compensates persons harmed.

Please note that this letter is a public document, and we will share a copy of this letter with all complainants, as required by 28 C.F.R. Part 35, Subpart F. At any time, the complainants may file a private suit, regardless of the contents of this letter and the Department's findings in this matter. 42 U.S.C. § 12133; 28 C.F.R. §35.172 (d).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rebecca B. Bond', with a stylized flourish at the end.

Rebecca B. Bond  
Chief  
Disability Rights

Enclosure: Appendix A

cc: Sarah Feinberg, Acting Administrator, Federal Railroad Administration  
Melissa Porter, Chief Counsel, Federal Railroad Administration  
Linda Martin, Office of Chief Counsel, Federal Railroad Administration  
Calvin Gibson, Director, Office of Civil Rights, Federal Railroad Administration

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

State	CODE	Station	Amtrak Responsibility as Determined by DOJ		
			Station Structures	Platforms	Parking Facilities
AL	ATN	Anniston		Amtrak	
AL	BHM	Birmingham	Amtrak	Amtrak	
AL	TCL	Tuscaloosa	Amtrak	Amtrak	Amtrak
AZ	FLG	Flagstaff		Amtrak shares responsibility	
AZ	KNG	Kingman	Amtrak	Amtrak	Amtrak
AZ	MRC	Maricopa	Amtrak	Amtrak	Amtrak
AZ	TUS	Tucson		Amtrak	
AZ	WMJ	Williams Junction		Amtrak	
AZ	WLO	Winslow	Amtrak	Amtrak	Amtrak
AZ	YUM	Yuma		Amtrak	
AR	HOP	Hope		Amtrak	Amtrak
AR	LRK	Little Rock	Amtrak	Amtrak	Amtrak
AR	TXA	Texarkana	Amtrak	Amtrak	Amtrak
AR	WNR	Walnut Ridge		Amtrak	Amtrak
CA	ANA	Anaheim			
CA	ACA	Antioch-Pittsburg			
CA	ARN	Auburn	Amtrak	Amtrak	Amtrak
CA	BFD	Bakersfield			
CA	BAR	Barstow		Amtrak	
CA	BKY	Berkeley		Amtrak	
CA	BUR	Burbank (Airport)			
CA	CML	Camarillo		Amtrak shares responsibility	
CA	CPN	Carpinteria		Amtrak	
CA	CWT	Chatsworth			
CA	CIC	Chico		Amtrak	
CA	COX	Colfax		Amtrak	
CA	OAC	Coliseum/Oakland Airport		Amtrak	
CA	COC	Corcoran		Amtrak	
CA	DAV	Davis		Amtrak	
CA	DUN	Dunsmuir	Amtrak	Amtrak	Amtrak
CA	EMY	Emeryville			
CA	FMT	Fremont		Amtrak shares responsibility	
CA	FNO	Fresno		Amtrak	
CA	FUL	Fullerton			
CA	GDL	Glendale			
CA	GTA	Goleta	Amtrak	Amtrak	
CA	GVB	Grover Beach		Amtrak	
CA	GUA	Guadalupe	Amtrak	Amtrak	Amtrak
CA	HNF	Hanford		Amtrak	
CA	HAY	Hayward		Amtrak	

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

State	CODE	Station	Amtrak Responsibility as Determined by DOJ		
			Station Structures	Platforms	Parking Facilities
CA	IRV	Irvine			
CA	LOD	Lodi		Amtrak	
CA	LPS	Lompoc-Surf	Amtrak	Amtrak	Amtrak
CA	LAX	Los Angeles			
CA	MDR	Madera			
CA	MTZ	Martinez		Amtrak	
CA	MCD	Merced		Amtrak	
CA	MOD	Modesto		Amtrak	
CA	MPK	Moorpark			
CA	NDL	Needles	Amtrak	Amtrak	Amtrak
CA	OKJ	Oakland (Jack London Square)		Amtrak	
CA	OSD	Oceanside			
CA	ONA	Ontario		Amtrak	
CA	OXN	Oxnard		Amtrak shares responsibility	
CA	PSN	Palm Springs		Amtrak	
CA	PRB	Paso Robles		Amtrak	
CA	POS	Pomona		Amtrak	
CA	RDD	Redding	Amtrak	Amtrak	Amtrak
CA	RIC	Richmond	Amtrak	Amtrak	
CA	RIV	Riverside			
CA	RLN	Rocklin		Amtrak	
CA	RSV	Roseville		Amtrak	
CA	SAC	Sacramento		Amtrak	Amtrak
CA	SNS	Salinas		Amtrak	
CA	SNB	San Bernardino		Amtrak	
CA	SNP	San Clemente Pier		Amtrak	
CA	SAN	San Diego - Downtown	Amtrak	Amtrak	
CA	OLT	San Diego - Old Town			
CA	SJC	San Jose			
CA	SNC	San Juan Capistrano	Amtrak		
CA	SLO	San Luis Obispo	Amtrak	Amtrak	Amtrak
CA	SNA	Santa Ana			
CA	SBA	Santa Barbara		Amtrak	
CA	GAC	Santa Clara (Great America)		Amtrak shares responsibility	
CA	SCC	Santa Clara (University Station)			
CA	SIM	Simi Valley			
CA	SOL	Solana Beach			
CA	SKN	Stockton - San Joaquin St. Station	Amtrak	Amtrak	Amtrak
CA	SKT	Stockton - Downtown/ACE Station		Amtrak shares responsibility	
CA	SUI	Suisun		Amtrak	

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

CA	TRU	Truckee		Amtrak	
CA	TRK	Turlock-Denair	Amtrak	Amtrak	Amtrak
CA	VNC	Van Nuys			
CA	VEC	Ventura		Amtrak	
CA	VRV	Victorville		Amtrak	
CA	WAC	Wasco			
CO	DEN	Denver			
CO	FMG	Fort Morgan	Amtrak	Amtrak	Amtrak
CO	GSC	Glenwood Springs	Amtrak	Amtrak	Amtrak
CO	GRA	Granby		Amtrak	Amtrak
CO	GJT	Grand Junction	Amtrak	Amtrak	Amtrak
CO	LAJ	La Junta	Amtrak	Amtrak	Amtrak
CO	LMR	Lamar		Amtrak	
CO	TRI	Trinidad		Amtrak	
CO	WIP	Winter Park/Fraser	Amtrak	Amtrak	
CT	BER	Berlin	Amtrak	Amtrak	
CT	BRP	Bridgeport			
CT	HFD	Hartford		Amtrak	
CT	MDN	Meriden		Amtrak	
CT	MYS	Mystic	Amtrak	Amtrak	Amtrak
CT	NHV	New Haven			
CT	NLC	New London	Amtrak shares responsibility	Amtrak	
CT	OSB	Old Saybrook	Amtrak	Amtrak	Amtrak
CT	STM	Stamford			
CT	WFD	Wallingford		<i>unclear</i>	
CT	WND	Windsor		Amtrak	
CT	WNL	Windsor Locks	Amtrak	Amtrak	
DE	NRK	Newark		Amtrak	
DE	WIL	Wilmington	Amtrak	Amtrak	
DC	WAS	Washington	Amtrak shares responsibility	Amtrak shares responsibility	Amtrak shares responsibility
FL	DFB	Deerfield Beach			
FL	DLD	Deland	Amtrak		
FL	DLB	Delray Beach			
FL	FTL	Fort Lauderdale			
FL	HOL	Hollywood			
FL	JAX	Jacksonville	Amtrak	Amtrak	Amtrak
FL	KIS	Kissimmee			
FL	LAK	Lakeland			
FL	MIA	Miami	Amtrak	Amtrak	Amtrak
FL	OKE	Okeechobee	Amtrak	Amtrak	Amtrak



Appendix A  
Amtrak is Responsible for the Following Stations Facilities

FL	ORL	Orlando			
FL	PAK	Palatka			
FL	SFA	Sanford (Auto Train)	Amtrak	Amtrak	Amtrak
FL	SBG	Sebring	Amtrak	Amtrak	Amtrak
FL	TPA	Tampa		Amtrak	
FL	WPB	West Palm Beach			
FL	WTH	Winter Haven	Amtrak	Amtrak	Amtrak
FL	WPK	Winter Park			
GA	ATL	Atlanta	Amtrak	Amtrak	Amtrak
GA	GNS	Gainesville	Amtrak	Amtrak	Amtrak
GA	JSP	Jesup		Amtrak	
GA	SAV	Savannah	Amtrak	Amtrak	Amtrak
ID	SPT	Sandpoint		Amtrak	Amtrak
IL	ALN	Alton	Amtrak	Amtrak	Amtrak
IL	BNL	Bloomington-Normal		Amtrak	
IL	CDL	Carbondale	Amtrak	Amtrak	Amtrak shares responsibility
IL	CRV	Carlinville	Amtrak	Amtrak	Amtrak
IL	CEN	Centralia		Amtrak	Amtrak
IL	CHM	Champaign-Urbana		Amtrak	
IL	CHI	Chicago - Union Station	Amtrak	Amtrak	Amtrak
IL	DQN	Du Quoin		Amtrak	
IL	DWT	Dwight		Amtrak	
IL	EFG	Effingham	Amtrak	Amtrak	Amtrak
IL	GBB	Galesburg		Amtrak	
IL	GLM	Gilman	Amtrak	Amtrak	Amtrak
IL	GLN	Glenview			
IL	HMW	Homewood	Amtrak shares responsibility	Amtrak shares responsibility	Amtrak shares responsibility
IL	JOL	Joliet			
IL	KKI	Kankakee		Amtrak	
IL	KEE	Kewanee		Amtrak	
IL	LAG	La Grange	Amtrak shares responsibility	Amtrak shares responsibility	
IL	LCN	Lincoln	Amtrak	Amtrak	
IL	MAC	Macomb	Amtrak	Amtrak	Amtrak
IL	MAT	Mattoon		Amtrak	
IL	MDT	Mendota		Amtrak	
IL	NPV	Naperville			
IL	PLO	Plano		Amtrak	
IL	PON	Pontiac	Amtrak	Amtrak	Amtrak
IL	PCT	Princeton	Amtrak	Amtrak	Amtrak
IL	QCY	Quincy		Amtrak	

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

State	CODE	Station	Amtrak Responsibility as Determined by DOJ		
			Station Structures	Platforms	Parking Facilities
IL	RTL	Rantoul	Amtrak	Amtrak	Amtrak
IL	SPI	Springfield	Amtrak	Amtrak	Amtrak
IL	SMT	Summit		Amtrak shares responsibility	
IN	COI	Connersville		Amtrak	Amtrak
IN	DYE	Dyer	Amtrak	Amtrak	Amtrak
IN	EKH	Elkhart		Amtrak	
IN	HMI	Hammond-Whiting	Amtrak	Amtrak	Amtrak
IN	IND	Indianapolis			
IN	LAF	Lafayette		Amtrak	
IN	MCI	Michigan City	Amtrak	Amtrak	Amtrak
IN	REN	Rensselaer	Amtrak	Amtrak	Amtrak
IN	SOB	South Bend		Amtrak	
IN	WTI	Waterloo	Amtrak	Amtrak	Amtrak
IA	BRL	Burlington		Amtrak	
IA	CRN	Creston	Amtrak	Amtrak	Amtrak
IA	FMD	Fort Madison	Amtrak	Amtrak	Amtrak
IA	MTP	Mt. Pleasant	Amtrak	Amtrak	Amtrak
IA	OSC	Osceola		Amtrak	
IA	OTM	Ottumwa	Amtrak	Amtrak	Amtrak
KS	DDG	Dodge City		Amtrak	
KS	GCK	Garden City		Amtrak	
KS	HUT	Hutchinson	Amtrak	Amtrak	Amtrak
KS	LRC	Lawrence	Amtrak	Amtrak	Amtrak
KS	NEW	Newton	Amtrak	Amtrak	
KS	TOP	Topeka	Amtrak	Amtrak	Amtrak
KY	AKY	Ashland		<i>unclear</i>	<i>unclear</i>
KY	MAY	Maysville	Amtrak	Amtrak	Amtrak
KY	SPM	South Shore-South Portsmouth	Amtrak	Amtrak	Amtrak
LA	HMD	Hammond	Amtrak	Amtrak	Amtrak
LA	LFT	Lafayette		Amtrak	
LA	LCH	Lake Charles		Amtrak	
LA	NOL	New Orleans			
ME	BRK	Brunswick			
ME	FRE	Freeport			
ME	ORB	Old Orchard Beach (Seasonal)			
ME	POR	Portland			
ME	SAO	Saco-Biddeford			
ME	WEM	Wells			
MD	ABE	Aberdeen	Amtrak	Amtrak	Amtrak
MD	BAL	Baltimore - Penn Station	Amtrak	Amtrak	

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

State	CODE	Station	Amtrak Responsibility as Determined by DOJ		
			Station Structures	Platforms	Parking Facilities
MD	BWI	BWI Thurgood Marshall Airport Station		Amtrak	
MD	CUM	Cumberland	Amtrak	Amtrak	
MD	NCR	New Carrollton	Amtrak	Amtrak	
MD	RKV	Rockville			
MA	AMM	Amherst	Amtrak	Amtrak	Amtrak
MA	BBY	Boston - Back Bay			
MA	BON	Boston - North Station			
MA	BOS	Boston - South Station			
MA	FRA	Framingham			
MA	HHL	Haverhill			
MA	PIT	Pittsfield		Amtrak	
MA	RTE	Route 128	Amtrak	Amtrak	
MA	SPG	Springfield	Amtrak	Amtrak	
MA	WOB	Woburn			
MA	WOR	Worcester			
MI	ARB	Ann Arbor	Amtrak	Amtrak	Amtrak
MI	BAM	Bangor		Amtrak	
MI	BTL	Battle Creek		Amtrak	
MI	BMM	Birmingham	Amtrak	Amtrak	Amtrak
MI	DER	Dearborn	Amtrak	Amtrak	
MI	DET	Detroit	Amtrak	Amtrak	
MI	DOA	Dowagiac		Amtrak	
MI	DRD	Durand			
MI	LNS	East Lansing		Amtrak	
MI	FLN	Flint			
MI	GRR	Grand Rapids	Amtrak	Amtrak	Amtrak
MI	HOM	Holland		Amtrak	
MI	JXN	Jackson	Amtrak	Amtrak	Amtrak
MI	KAL	Kalamazoo			
MI	LPE	Lapeer		Amtrak	
MI	NBU	New Buffalo		Amtrak	
MI	NLS	Niles	Amtrak	Amtrak	Amtrak
MI	PNT	Pontiac			
MI	PTH	Port Huron	Amtrak	Amtrak	Amtrak
MI	ROY	Royal Oak		Amtrak	
MI	SJM	St. Joseph			
MN	DLK	Detroit Lakes	Amtrak	Amtrak	Amtrak
MN	RDW	Red Wing	Amtrak	Amtrak	Amtrak
MN	SCD	St. Cloud	Amtrak	Amtrak	Amtrak
MN	MSP	St. Paul/Minneapolis	Amtrak	Amtrak	Amtrak

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

State	CODE	Station	Amtrak Responsibility as Determined by DOJ		
			Station Structures	Platforms	Parking Facilities
MN	SPL	Staples	Amtrak	Amtrak	Amtrak
MN	WIN	Winona	Amtrak	Amtrak	Amtrak
MS	BRH	Brookhaven		<i>unclear</i>	
MS	GWD	Greenwood	Amtrak	Amtrak	Amtrak
MS	HBG	Hattiesburg		Amtrak	
MS	JAN	Jackson		Amtrak	N/A
MS	MEI	Meridian		Amtrak	
MO	HEM	Hermann			
MO	IDP	Independence	Amtrak	Amtrak	Amtrak
MO	JEF	Jefferson City		Amtrak	
MO	KCY	Kansas City	Amtrak	Amtrak	Amtrak
MO	KWD	Kirkwood		Amtrak	
MO	LAP	La Plata	Amtrak	Amtrak	Amtrak
MO	LEE	Lees Summit	Amtrak	Amtrak	Amtrak
MO	PBF	Poplar Bluff	Amtrak	Amtrak	Amtrak
MO	SED	Sedalia	Amtrak	Amtrak	Amtrak
MO	STL	St. Louis			Amtrak shares responsibility
MO	WAR	Warrensburg		Amtrak	
MO	WAH	Washington		Amtrak	
MT	BRO	Browning (Seasonal)	Amtrak (shelter)	Amtrak	Amtrak
MT	CUT	Cut Bank	Amtrak	Amtrak	Amtrak
MT	GPK	East Glacier Park (Seasonal)	Amtrak	Amtrak	Amtrak
MT	GGW	Glasgow	Amtrak	Amtrak	Amtrak
MT	HAV	Havre	Amtrak	Amtrak	Amtrak
MT	LIB	Libby	Amtrak	Amtrak	Amtrak
MT	MAL	Malta	Amtrak	Amtrak	Amtrak
MT	SBY	Shelby	Amtrak	Amtrak	Amtrak
MT	WGL	West Glacier	Amtrak	Amtrak	Amtrak
MT	WFH	Whitefish	Amtrak	Amtrak	Amtrak
MT	WPT	Wolf Point	Amtrak	Amtrak	Amtrak
NE	HAS	Hastings	Amtrak	Amtrak	Amtrak
NE	HLD	Holdrege	Amtrak	Amtrak	Amtrak
NE	LNK	Lincoln		Amtrak	
NE	MCK	McCook	Amtrak	Amtrak	Amtrak
NE	OMA	Omaha	Amtrak	Amtrak	Amtrak
NV	ELK	Elko	Amtrak	Amtrak	Amtrak
NV	RNO	Reno			
NV	WNN	Winnemucca	Amtrak	Amtrak	Amtrak
NH	CLA	Claremont		Amtrak	Amtrak
NH	DOV	Dover			

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

State	CODE	Station	Amtrak Responsibility as Determined by DOJ		
			Station Structures	Platforms	Parking Facilities
NH	DHM	Durham			
NH	EXR	Exeter			
NJ	MET	Metropark			
NJ	NBK	New Brunswick			
NJ	NWK	Newark - Penn Station			
NJ	EWR	Newark Liberty International Airport			
NJ	PJC	Princeton Junction			
NJ	TRE	Trenton			
NM	ABQ	Albuquerque			
NM	GLP	Gallup		Amtrak	
NM	LMY	Lamy	Amtrak		Amtrak
NM	LSV	Las Vegas		Amtrak	
NM	RAT	Raton	Amtrak	Amtrak	Amtrak
NY	ALB	Albany-Rensselaer			
NY	AMS	Amsterdam	Amtrak	Amtrak	Amtrak
NY	BFX	Buffalo - Exchange St.		Amtrak	
NY	BUF	Buffalo-Depew		Amtrak	
NY	CRT	Croton Harmon			
NY	FED	Fort Edward-Glens Falls	Amtrak	Amtrak	Amtrak
NY	HUD	Hudson	Amtrak	Amtrak	Amtrak (one parking facility)
NY	NRO	New Rochelle			
NY	NYP	New York - Penn Station	Amtrak	Amtrak	
NY	NFL	Niagara Falls	Amtrak	Amtrak	Amtrak
NY	PLB	Plattsburgh	Amtrak	Amtrak	Amtrak
NY	POH	Port Henry	Amtrak	Amtrak	Amtrak
NY	PRK	Port Kent (Seasonal)	Amtrak	Amtrak	Amtrak
NY	POU	Poughkeepsie			
NY	RHI	Rhinecliff		Amtrak	Amtrak shares responsibility
NY	ROC	Rochester	Amtrak	Amtrak	Amtrak
NY	ROM	Rome		Amtrak	
NY	RSP	Rouses Point		Amtrak	
NY	SAR	Saratoga Springs	Amtrak	Amtrak	Amtrak
NY	SDY	Schenectady	Amtrak	Amtrak	Amtrak shares responsibility
NY	SYR	Syracuse			
NY	FTC	Ticonderoga	Amtrak	Amtrak	Amtrak
NY	UCA	Utica		Amtrak	
NY	WSP	Westport		Amtrak	Amtrak
NY	WHL	Whitehall	Amtrak	Amtrak	Amtrak
NY	YNY	Yonkers			
NC	BNC	Burlington			

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

NC	CYN	Cary			
NC	CLT	Charlotte	Amtrak	Amtrak	Amtrak
NC	DNC	Durham	Amtrak		Amtrak
NC	FAY	Fayetteville		Amtrak	
NC	GRO	Greensboro			
NC	HAM	Hamlet		Amtrak	
NC	HPT	High Point			
NC	KAN	Kannapolis			
NC	RGH	Raleigh			
NC	RMT	Rocky Mount		Amtrak	
NC	SAL	Salisbury	Amtrak		Amtrak
NC	SSM	Selma		<i>unclear</i>	
NC	SOP	Southern Pines			
NC	WLN	Wilson		Amtrak	
ND	DVL	Devils Lake	Amtrak	Amtrak	Amtrak
ND	FAR	Fargo	Amtrak	Amtrak	Amtrak
ND	GFK	Grand Forks	Amtrak	Amtrak	Amtrak
ND	MOT	Minot	Amtrak	Amtrak	Amtrak
ND	RUG	Rugby	Amtrak	Amtrak	Amtrak
ND	STN	Stanley	Amtrak	Amtrak	Amtrak
ND	WTN	Williston	Amtrak	Amtrak	Amtrak
OH	ALC	Alliance	Amtrak	Amtrak	Amtrak
OH	BYN	Bryan	Amtrak	Amtrak	Amtrak
OH	CIN	Cincinnati		Amtrak	
OH	CLE	Cleveland	Amtrak	Amtrak	Amtrak
OH	ELY	Elyria	Amtrak	Amtrak	Amtrak
OH	SKY	Sandusky		Amtrak	
OH	TOL	Toledo			
OK	ADM	Ardmore			
OK	NOR	Norman		Amtrak	
OK	OKC	Oklahoma City	Amtrak	Amtrak	Amtrak
OK	PVL	Pauls Valley		Amtrak	
OK	PUR	Purcell		Amtrak	
OR	ALY	Albany		Amtrak	
OR	CMO	Chemult	Amtrak	Amtrak	Amtrak
OR	EUG	Eugene		Amtrak	
OR	KFS	Klamath Falls	Amtrak	Amtrak	Amtrak
OR	ORC	Oregon City		Amtrak	
OR	PDX	Portland			
OR	SLM	Salem		Amtrak	

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

PA	ALT	Altoona		Amtrak	
PA	ARD	Ardmore	Amtrak	Amtrak	Amtrak
PA	COT	Coatesville		Amtrak	Amtrak
PA	COV	Connellsville	Amtrak	Amtrak	Amtrak
PA	CWH	Cornwells Heights	Amtrak	Amtrak	Amtrak
PA	DOW	Downingtown	Amtrak	Amtrak	Amtrak
PA	ELT	Elizabethtown	Amtrak	Amtrak	Amtrak
PA	ERI	Erie	Amtrak	Amtrak	Amtrak
PA	EXT	Exton	Amtrak	Amtrak	Amtrak
PA	GNB	Greensburg	Amtrak	Amtrak	Amtrak
PA	HAR	Harrisburg	Amtrak	Amtrak	Amtrak
PA	HGD	Huntingdon	Amtrak	Amtrak	Amtrak
PA	JST	Johnstown	Amtrak	Amtrak	Amtrak
PA	LNC	Lancaster	Amtrak	Amtrak	Amtrak
PA	LEW	Lewistown	Amtrak	Amtrak	Amtrak
PA	MID	Middletown	Amtrak	Amtrak	Amtrak
PA	MJY	Mount Joy	Amtrak	Amtrak	Amtrak
PA	PAO	Paoli	Amtrak	Amtrak	<i>unclear</i>
PA	PAR	Parkesburg	Amtrak	Amtrak	Amtrak
PA	PHL	Philadelphia - 30th Street Station	Amtrak	Amtrak	Amtrak
PA	PHN	Philadelphia - North	Amtrak	Amtrak	Amtrak
PA	PGH	Pittsburgh	Amtrak	Amtrak	Amtrak
RI	KIN	Kingston		Amtrak	
RI	PVD	Providence	Amtrak	Amtrak	
RI	WLY	Westerly		Amtrak	
SC	CAM	Camden	Amtrak	Amtrak	Amtrak
SC	CHS	Charleston	Amtrak	Amtrak	Amtrak
SC	CSN	Clemson		Amtrak	
SC	CLB	Columbia		Amtrak	
SC	DNK	Denmark		Amtrak	
SC	DIL	Dillon	Amtrak	Amtrak	Amtrak
SC	FLO	Florence	Amtrak	Amtrak	Amtrak
SC	GRV	Greenville	Amtrak	Amtrak	Amtrak
SC	KTR	Kingstree			
SC	SPB	Spartanburg			
SC	YEM	Yemassee		Amtrak	
TN	MEM	Memphis			
TX	ALP	Alpine	Amtrak	Amtrak	Amtrak
TX	AUS	Austin	Amtrak	Amtrak	Amtrak
TX	BMT	Beaumont		Amtrak	

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

TX	CBR	Cleburne		Amtrak	
TX	DAL	Dallas			
TX	DRT	Del Rio		Amtrak	
TX	ELP	El Paso			
TX	FTW	Fort Worth			
TX	GLE	Gainesville		Amtrak shares responsibility	Amtrak
TX	HOS	Houston	Amtrak	Amtrak	Amtrak
TX	LVW	Longview		Amtrak	Amtrak
TX	MHL	Marshall	Amtrak	Amtrak	Amtrak
TX	MCG	McGregor	Amtrak	Amtrak	Amtrak
TX	MIN	Mineola		Amtrak	
TX	SAS	San Antonio			
TX	SMC	San Marcos			
TX	TAY	Taylor		Amtrak	Amtrak
TX	TPL	Temple		Amtrak	
UT	GRI	Green River		Amtrak	Amtrak
UT	HER	Helper	Amtrak	Amtrak	Amtrak
UT	PRO	Provo	Amtrak	Amtrak	
UT	SLC	Salt Lake City			
VT	BLF	Bellows Falls	Amtrak	Amtrak	Amtrak
VT	BRA	Brattleboro		Amtrak	
VT	CNV	Castleton	Amtrak	Amtrak	Amtrak
VT	ESX	Essex Junction	Amtrak	Amtrak	Amtrak
VT	MPR	Montpelier	Amtrak	Amtrak	Amtrak
VT	RPH	Randolph	Amtrak	Amtrak	Amtrak
VT	RUD	Rutland			
VT	SAB	St. Albans	Amtrak	Amtrak	Amtrak
VT	WAB	Waterbury	Amtrak	Amtrak	Amtrak
VT	WRJ	White River Jct.	Amtrak	Amtrak	Amtrak
VT	WNM	Windsor		Amtrak	Amtrak
VA	ALX	Alexandria		Amtrak shares responsibility	
VA	ASD	Ashland		Amtrak	
VA	BCV	Burke Centre			
VA	CVS	Charlottesville	Amtrak	Amtrak	Amtrak shares responsibility
VA	CLF	Clifton Forge	Amtrak	Amtrak	Amtrak
VA	CLP	Culpeper		Amtrak	
VA	DAN	Danville			
VA	FBG	Fredericksburg	Amtrak shares responsibility	Amtrak shares responsibility	Amtrak shares responsibility
VA	LOR	Lorton (Auto Train)	Amtrak	Amtrak	Amtrak
VA	LYH	Lynchburg		Amtrak	



Appendix A  
Amtrak is Responsible for the Following Stations Facilities

State	CODE	Station	Amtrak Responsibility as Determined by DOJ		
			Station Structures	Platforms	Parking Facilities
VA	MSS	Manassas		Amtrak shares responsibility	
VA	NPN	Newport News	Amtrak	Amtrak	Amtrak shares responsibility
VA	NFK	Norfolk		Amtrak	
VA	PTB	Petersburg	Amtrak	Amtrak	Amtrak
VA	QAN	Quantico	Amtrak shares responsibility	Amtrak shares responsibility	
VA	RVM	Richmond - Main St.		Amtrak	
VA	RVR	Richmond - Staples Mill Rd.	Amtrak	Amtrak	Amtrak
VA	STA	Staunton	Amtrak	Amtrak	Amtrak
VA	WBG	Williamsburg		Amtrak	
VA	WDB	Woodbridge		Amtrak shares responsibility	
WA	BEL	Bellingham			
WA	BNG	Bingen-White Salmon	Amtrak	Amtrak	Amtrak
WA	CTL	Centralia		Amtrak	
WA	EDM	Edmonds	Amtrak shares responsibility	Amtrak shares responsibility	
WA	EPH	Ephrata		Amtrak	
WA	EVR	Everett		Amtrak shares responsibility	
WA	KEL	Kelso-Longview		Amtrak	Amtrak
WA	LWA	Leavenworth			
WA	MVW	Mount Vernon		Amtrak	
WA	OLW	Olympia/Lacey		Amtrak	
WA	PSC	Pasco		Amtrak	
WA	SEA	Seattle - King Street Station		Amtrak	
WA	SPK	Spokane			
WA	STW	Stanwood			
WA	TAC	Tacoma	Amtrak	Amtrak	Amtrak
WA	TUK	Tukwila		Amtrak shares responsibility	
WA	VAN	Vancouver		<i>unclear</i>	
WA	WEN	Wenatchee	Amtrak	Amtrak	
WA	WIH	Wishram	Amtrak	Amtrak	Amtrak
WV	CHW	Charleston	Amtrak	Amtrak	Amtrak
WV	HFY	Harpers Ferry	Amtrak shares responsibility	Amtrak shares responsibility	Amtrak shares responsibility
WV	HIN	Hinton		Amtrak	Amtrak
WV	HUN	Huntington	Amtrak	Amtrak	Amtrak
WV	MRB	Martinsburg		Amtrak shares responsibility	
WV	MNG	Montgomery	Amtrak	Amtrak	
WV	PRC	Prince	Amtrak	Amtrak	Amtrak
WV	WSS	White Sulphur Springs	Amtrak	Amtrak	Amtrak
WI	CBS	Columbus	Amtrak	Amtrak	Amtrak
WI	LSE	LaCrosse	Amtrak	Amtrak	Amtrak
WI	MKE	Milwaukee			

Appendix A  
Amtrak is Responsible for the Following Stations Facilities

State	CODE	Station	Amtrak Responsibility as Determined by DOJ		
			Station Structures	Platforms	Parking Facilities
WI	MKA	Milwaukee - General Mitchell Intl. Airport		Amtrak	
WI	POG	Portage	Amtrak	Amtrak	Amtrak
WI	SVT	Sturtevant			
WI	TOH	Tomah	Amtrak	Amtrak	Amtrak
WI	WDL	Wisconsin Dells		Amtrak	Amtrak