



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED

07-20-10
04:59 PM

Order Instituting Rulemaking to determine whether the temporary measures adopted in Resolution SX-88 or other measures banning personal use of electronic devices by rail transit personnel should be adopted on a permanent basis.

Rulemaking 08-10-007
(Filed October 16, 2008)

**RESPONSE OF
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION
AUTHORITY
TO ADMINISTRATIVE LAW JUDGE'S RULING
SEEKING IN-CAB CAMERA COST AND RELATED DATA**

NOSSAMAN LLP

Martin A. Mattes

50 California Street, 34th Floor
San Francisco, CA 94111-4799
Tel: (415) 398-3600
Fax: (415) 398-2438
Email: mmattes@nossaman.com

Attorneys for LOS ANGELES COUNTY
METROPOLITAN TRANSPORTATION
AUTHORITY

July 20, 2010

SUBJECT INDEX

Page

A.	Describe any known and existing railroad or rail transit in-cab camera installation, including their components, component capacities (e.g., loop recording duration, in-cab and off-site storage capacities), component and total costs, how they operate, and how they are utilized. Describe any known, existing, similar and comparable in-cab visual and/or audio monitoring system utilized on other transportation modes, such as buses, if such system can be effectively installed and effectively utilized on rail transit vehicles.....	1
B.	Describe any and all existing privacy or other legal protections, limitations or barriers to installing and utilizing an in-cab camera on railroad, rail transit, or other similar transportation modes	4
C.	Provide the breakdown of all of the anticipated costs associated with the in-cab camera acquisition, installation, maintenance, monitoring and enforcement as well as source of such cost figures, for existing and proposed systems and their capacities.	6
D.	Provide cost estimates so that scaled-up and scaled-down capacities can be estimated based upon such estimates (e.g., more or fewer hours of loop recording, more or fewer days of required retention, retention of particular operational times based on narrowing criteria versus retention of all continuous recordings	6
E.	Provide a list of all known alternatives to in-cab camera option, including all reasonably foreseeable alternative technology or technologies, which (i) are more effective and/or more cost-effective as a safety tool than the in-cab camera and (ii) will serve the same effective function of allowing for in-cab visual and auditory monitoring and deterrence	6
F.	Provide a list of the existing and foreseeable funding sources for in-cab camera and amounts from each source	7
G.	Provide a list of the existing and foreseeable funding sources for any existing, foreseeable and comparable alternative to in-cab camera and amounts from each source.....	7

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to determine whether the temporary measures adopted in Resolution SX-88 or other measures banning personal use of electronic devices by rail transit personnel should be adopted on a permanent basis.

Rulemaking 08-10-007
(Filed October 16, 2008)

**RESPONSE OF
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY
TO ADMINISTRATIVE LAW JUDGE'S RULING
SEEKING IN-CAB CAMERA COST AND RELATED DATA**

In accordance with the Commission's Rules of Practice and Procedure, Los Angeles County Metropolitan Transportation Authority ("Metro") hereby provides its response to the Administrative Law Judge's Ruling Seeking in-Cab Camera Cost and Related Data, issued June 23, 2010, by Administrative Law Judge ("ALJ") Kimberly Kim. The ALJ's Ruling seeks additional data from the parties and from the Commission's Consumer Protection and Safety Division ("CPSD") relating to the costs associated with in-cab camera surveillance systems, their cost effectiveness, barriers to their installation and use, comparable systems, alternative options, and sources of funding. ALJ's Ruling, at 2-3. Metro's responses to the ALJ's requests directed to parties are as follow:

- A. Describe any known and existing railroad or rail transit in-cab camera installation, including their components, component capacities (e.g., loop recording duration, in-cab and off-site storage capacities), component and total costs, how they operate, and how they are utilized. Describe any known, existing, similar and comparable in-cab visual and/or audio monitoring system utilized on other transportation modes, such as buses, if such system can be effectively installed and effectively utilized on rail transit vehicles;**

Metro does not presently maintain or employ any in-cab camera installation in connection with its rail transit operations. Metro is, however, in the process of installing an in-cab system known as SmartDrive in all motor buses that it operates.

SmartDrive is a service including hardware, software, and operational support provided by SmartDrive Systems, a company based in San Diego. The service includes the recording of video, speed, and logistics from the road, followed by review and identification of critical safety events and operational inefficiencies. Fleet managers are provided daily recommendations intended to accelerate responses and deliver sustainable safety and efficiency benefits.

The SmartRecorder™ system is an innovative event recording system, capturing comprehensive vehicle data from triggered events. The SmartRecorder is a video event recorder triggered by a proprietary process including an accelerometer that measures sudden movements such as swerving and sudden braking and a speed sensor that determines when a driver exceeds a safe speed. The recorder is attached to the windshield behind the rearview mirror and contains a forward and inward facing dual lens camera with a full 280 degree vantage of the front of the vehicle, inside the cab, as well as side and rear windows.

The recorder captures video, audio, speed, and location, and each event is recorded for a total of 30 seconds, 15 seconds before and after each incident. The system operates similarly to a DVR or Tivo system by continuously recording into a temporary memory buffer. After 15 seconds, the recorded video is erased unless the camera is activated. Each unit does have a driver operated "manual button", which allows a driver to record video in 30 second increments should a driver wish to record an event. Individual events are scored with respect to 55 driving observations and are delivered to the SmartDrive Response Center™, which offers guidance to the agency and its vehicle operators.

The SmartRecorder is triggered by sudden G-Forces, such as sudden braking, swerving, or a collision or by exceeding speed thresholds. In contrast to a surveillance system, which saves 100 percent of captured video, the SmartRecorder

System saves less than one percent of the video it records, and the number of incidents saved tends to decline as vehicle operators adjust their behavior in response to the system's presence.

The sorts of events that trigger the SmartRecorder are relatively frequent in the operation of buses on city streets and highways, but occur far less often in the operation of a light rail transit system. Light rail vehicles ("LRVs"), operating on fixed rails, never swerve and rarely apply brakes or stop so suddenly as would activate the SmartRecorder system. Typically operating under cab control directions that limit operating speeds, it is unlikely that LRVs would exceed any speed threshold set to activate the SmartRecorder. Most relevantly, there is no way that an LRV operator's use of a cell phone other personal electronic device ("PED") would activate the SmartRecorder, unless the PED use caused the operator to brake suddenly or take other abnormal action. Because the SmartRecorder does not save video records apart from reported incidents, it will provide no record of operator behavior except when such incidents occur.

Accordingly, the SmartRecorder system will not enhance the safety of LRV operations and would not support the enforcement of current or prospective regulations prohibiting operators' use of PEDs. Metro does not plan to install the SmartRecorder system in its LRV fleet.

Metro's buses also are equipped with more conventional video cameras, which are directed to the passenger area of the vehicle, *not* to the operator's cab. These cameras retain two to three days of video recording but then record over the previous material. When incidents of concern occur and the video recording is still available, it is removed and retained for a two-year period – and even longer if it becomes evidence in a judicial or administrative procedure. Metro is presently considering whether to reduce this

routine retention period to one year, consistent with statutory requirements discussed below.

B. Describe any and all existing privacy or other legal protections, limitations or barriers to installing and utilizing an in-cab camera on railroad, rail transit, or other similar transportation modes

Imposition of an in-cab camera supervision system would be a subject for collective bargaining between Metro and the unions representing LRV operators. Metro is greatly concerned that such a requirement, involving far more comprehensive video record keeping than the SmartRecorder system entails and raising significant privacy concerns, would seriously complicate Metro's labor contract negotiations.

In addition, the in-cab camera recording and record keeping requirements of the draft General Order conflict with requirements of the California Government Code applicable to transit districts, including Metro, specifically Government Code §§53160-62. Government Code §53160 imposes a one-year holding period for recordings of routine video monitoring.¹ Government Code §53162 further requires, subject to exceptions, that any transit district installing a new security system must purchase and install video recording equipment capable of storing recorded images for at least one year and that

¹ Gov. Code §53160 provides as follows:

(a) The head of a special district, after one year, may destroy recordings of routine video monitoring . . . maintained by the special district. This destruction shall be approved by the legislative body and the written consent of the agency attorney shall be obtained. In the event that the recordings are evidence in any claim filed or any pending litigation, they shall be preserved until pending litigation is resolved.

. . . .

(c) For purposes of this article, "routine video monitoring" means video recording by a video or electronic imaging system designed to record the regular and ongoing operations of the special district, including mobile in-car video systems, jail observation and monitoring systems, and building security recording systems.

(d) For purposes of this article, "special district" shall have the same meaning as "public agency," as that term is defined in Section 53050.

any transit district must, “notwithstanding any other provision of law,” retain such video recordings for one year.²

Metro is greatly concerned that the proposed General Order, despite its requirement that video recordings be retained for a period of 60 days, would have the effect of requiring transit districts such as Metro to create massive amounts of video requirements, which, pursuant to Government Code §53162(b), would have to be retained for an entire year. Such a retention requirement would substantially increase the costs for downloading and storing video data recorded pursuant to the proposed General Order as estimated in Metro’s Comments filed January 22, 2010, in this proceeding.

² Gov. Code §53162 provides:

(a) When installing new security systems, a transit agency operated by a special district shall only purchase and install equipment capable of storing recorded images for at least one year, unless all of the following conditions apply:

(1) The transit agency has made a diligent effort to identify a security system that is capable of storing recorded data for one year.

(2) The transit agency determines that the technology to store recorded data in an economically and technologically feasible manner for one year is not available.

(3) The transit agency purchases and installs the best available technology with respect to storage capacity that is both economically and technologically feasible at that time.

(b) Notwithstanding any other provision of law, video recordings or other recordings made by security systems operated as part of a public transit system shall be retained for one year, unless one of the following conditions applies:

(1) The video recordings or other recordings are evidence in any claim filed or any pending litigation, in which case the video recordings or other recordings shall be preserved until the claim or the pending litigation is resolved.

(2) The video recordings or other recordings recorded an event that was or is the subject of an incident report, in which case the video recordings or other recordings shall be preserved until the incident is resolved.

(3) The transit agency utilizes a security system that was purchased or installed prior to January 1, 2004, or that meets the requirements of subdivision (a), in which case the video recordings or other recordings shall be preserved for as long as the installed technology allows.

- C. Provide the breakdown of all of the anticipated costs associated with the in-cab camera acquisition, installation, maintenance, monitoring and enforcement as well as source of such cost figures, for existing and proposed systems and their capacities.**

Metro provided such an estimate as Attachment A to its Comments filed January 22, 2010, in this proceeding.

- D. Provide cost estimates so that scaled-up and scaled-down capacities can be estimated based upon such estimates (e.g., more or fewer hours of loop recording, more or fewer days of required retention, retention of particular operational times based on narrowing criteria versus retention of all continuous recordings).**

The costs Metro has estimated are not scalable on a linear basis (that is, the cost of storing 30 days of video data is not half the cost of storing 60 days of video data), and therefore determining scalable costs is difficult. However, Metro believes that even a significant reduction in the number of days for video data retention will result in total costs ranging in the millions of dollars – including capital costs and ongoing annual operating, maintenance, and administrative costs. These would be dollars that are not available to Metro in the current fiscal environment.

A further concern is that whatever the scaling down of retention requirements in the proposed General Order, Government Code §53162 still will require that any video recordings created pursuant to the General Order will have to be retained for a period of one year.

- E. Provide a list of all known alternatives to in-cab camera option, including all reasonably foreseeable alternative technology or technologies, which (i) are more effective and/or more cost-effective as a safety tool than the in-cab camera and (ii) will serve the same effective function of allowing for in-cab visual and auditory monitoring and deterrence.**

Metro does not know of an alternative technological solution. The more effective – and cost-effective – solution, agreed upon by the eight Rail Transit Agencies that filed Joint Comments on November 10, 2009, in this proceeding, is to adopt a rule

against LRV operators' possession or use of PEDs that includes imposition of "the extreme sanction of termination on a first-time offense." Joint Comments, at 5. A "zero tolerance" policy will achieve more effective enforcement than any costly and intrusive technological fix.

F. Provide a list of the existing and foreseeable funding sources for in-cab camera and amounts from each source.

Metro has no such existing or foreseeable funding sources.

G. Provide a list of the existing and foreseeable funding sources for any existing, foreseeable and comparable alternative to in-cab camera and amounts from each source.

Metro has no existing or foreseeable funding source for any alternative technological solution. The "zero tolerance" rule Metro supports does not require special funding from any source.

Respectfully submitted,

NOSSAMAN LLP

By: /S/ MARTIN A. MATTES
Martin A. Mattes

50 California Street, 34th Floor
San Francisco, CA 94111-4799
Tel.: (415) 398-3600
Fax: (415) 398-2438
Email: mmattes@nossaman.com

Attorneys for LOS ANGELES COUNTY
METROPOLITAN TRANSPORTATION
AUTHORITY

July 20, 2010

VERIFICATION

I am the attorney for Los Angeles County Metropolitan Transportation Authority ("Metro"), respondent to Rulemaking 08-10-007, with respect to that rulemaking. Said respondent is absent from the City and County of San Francisco, California, where I have my office, and I make this verification for Metro for that reason. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 20, 2010, at San Francisco, California.

/S/ MARTIN A. MATTES

Martin A. Mattes

CERTIFICATE OF SERVICE

I, Jeannie Wong, hereby certify that on this date I served the foregoing **RESPONSE OF LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY TO ADMINISTRATIVE LAW JUDGE'S RULING SEEKING IN-CAB CAMERA COST AND RELATED DATA** on the following persons on the service list for R.08-10-007:

By electronic mail:

jess@alliancegrp.com; mschroeder@apta.com; dispatch@atu.org; mark.rosenker@ntsb.gov; finkelsteind@mta.net; snobler@metro.net; khawaniv@metro.net; puglisid@metro.net; john@welborne.net; nlopez@teamsters911.com; karend@portla.org; bill.woodward@dhs.gov; wpenn@nctd.org; wayne.terry@sdmts.com; nancy.dock@sdmts.com; nathaniel.ford@sfmta.com; tmacbride@goodinmacbride.com; michael.kirchanski@ci.sf.ca.us; ddugger@bart.gov; JLau@bart.gov; ggee@bart.gov; lhardy@bart.gov; benjamin.scharf@vta.org; Michael.Burns@vta.org; eksterowicz@vta.org; psc4@ibew1245.com; msakauye@sacrt.com; mwiley@sacrt.com; rfrancis@sacrt.com; utucslb@mindspring.com; josh@shawyoder.org; transitunion256@sbcglobal.net; econtreras@nctd.org; WStringer@nctd.org; john.kennedy@sfgov.org; mmattes@nossaman.com; michael.robert@flysfo.com; HGORDON100@aol.com; mr.nelson@sbcglobal.net; mlonergan@sacrt.com; cwp@cpuc.ca.gov; gg1@cpuc.ca.gov; rpg@cpuc.ca.gov; suf@cpuc.ca.gov; cl1@cpuc.ca.gov; sul@cpuc.ca.gov; jjz@cpuc.ca.gov; kk2@cpuc.ca.gov; psb@cpuc.ca.gov; pwk@cpuc.ca.gov; rwc@cpuc.ca.gov; ttf@cpuc.ca.gov; vdl@cpuc.ca.gov;

By hand delivery:

Hon. Kimberly Kim
Administrative Law Judge
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Hon. John Bohn
Assigned Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

By first-class, U.S. mail:

See Attached List of Service By U.S. Mail.

Executed this 20th day of July, 2010 in San Francisco, California.

/S/ JEANNIE WONG

Jeannie Wong

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

**PROCEEDING: R0810007 - CPUC - OIR TO DETERM
LAST CHANGED: JUNE 23, 2010**

Parties

JESS DIPASQUALE
PRESIDENT & CEO
ALLIANCE GROUP SERVICES INC
1221 POST ROAD EAST
WESTPORT, CT 06880
FOR: ALLIANCE GROUP SERVICES INC

ATU - INTERNATIONAL HEADQUARTERS
5025 WISCONSIN AVENUE, NW
WASHINGTON, DC 20016
FOR: ATU

TCU
TCU HEADQUARTERS, LOCAL 1315
3 RESEARCH PLACE
ROCKVILLE, MD 20850
FOR: TCU

ROGER SNOBLE
CHIEF EXECUTIVE OFFICER
LOS ANGELES COUNTY METRO TRANS. AUTH
ONE GATEWAY PLAZA, 25TH FL
LOS ANGELES, CA 90012
FOR: LOS ANGELES COUNTY METRO TRANS.
AUTH

DAVIDE F. PUGLISI
MGR. RAIL DIVISION
METRO RAIL
ONE GATEWAY PLAZA (99-11-2)
LOS ANGELES, CA 90013
FOR: METRO RAIL

THE GROVE TROLLEY
189 THE GROVE DRIVE
LOS ANGELES, CA 90036
FOR: THE GROVE TROLLEY

TEAMSTERS LOCAL 911
9900 FLOWER STREET
BELLFLOWER, CA 90706
FOR: TEAMSTERS LOCAL 911

MARTIN SCHROEDER
STAFF ADVISOR
APTA
1666 K STREET, N.W., STE 1100
WASHINGTON, DC 20006
FOR: APTA

MARK ROSENKER
CHAIRMAN
NTSB
429 LENFANT PLAZA
WASHINGTON, DC 20024
FOR: NTSB

DANIEL FINKELSTEIN
CHIEF OF TRANSIT POLICE
LA COUNTY METROPOLITAN TRANSPORT AGENCY
ONE GATEWAY PLAZA / MAIL STOP 99-PL-15
LOS ANGELES, CA 90012
FOR: LA COUNTY METROPOLITAN TRANSPORT
AGENCY

VIJAY KHAWANI
DIRECTOR OF CORPORATE SAFETY
LA COUNTY METROPOLITAN TRANS. AUTHORITY
ONE GATEWAY PLAZA, 18TH FLOOR
LOS ANGELES, CA 90012-2952
FOR: LA COUNTY METROPOLITAN TRANS.
AUTHORITY

AFSCME LOCAL 3634
514 SHATTO PLACE
LOS ANGELES, CA 90020
FOR: AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL EMPLOYEES UNION

JOHN H. WELBORNE
ANGELS FLIGHT
PO BOX 712345
LOS ANGELES, CA 90071
FOR: ANGELS FLIGHT

KURT AREND
GENERAL MANAGER
PORT OF LOS ANGELES RED CAR LINE
425 S. PALOS VERDES STREET
SAN PEDRO, CA 90731
FOR: PORT OF LOS ANGELES RED CAR LINE

AMERICANA AT BRAND TROLLEY
889 AMERICANA WAY, STE 330
GLENDALE, CA 91210
FOR: AMERICANA AT BRAND TROLLEY

WAYNE PENN
RAIL SAFETY OFFICER
NORTH COUNTY TRANSIT DISTRICT
810 MISSION AVENUE
OCEANSIDE, CA 92054
FOR: NORTH COUNTY TRANSIT DISTRICT

NANCY DOCK
SYSTEM SAFETY MANAGER
SAN DIEGO TROLLEY, INC.
1255 IMPERIAL AVENUE, STE 900
SAN DIEGO, CA 92101
FOR: SAN DIEGO TROLLEY, INC.

OPERATING ENGINEERS - LOCAL 2
828 MAHLER ROAD, STE B
BURLINGAME, CA 94010
FOR: OPERATING ENGINEERS - LOCAL 2

INT'L FED PROF AND TECH ENGINEERS L-21
1182 MARKET STREET, RM 425
SAN FRANCISCO, CA 94102
FOR: INTERNATIONAL FEDERATION OF
PROFESSIONAL AND TECHNICAL ENGINEERS,
LOCAL 21

SHEET METAL WORKERS - LOCAL 104
1939 MARKET STREET
SAN FRANCISCO, CA 94103
FOR: SHEET METAL WORKERS - LOCAL 104

THOMAS J. MACBRIDE, JR.
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: GOODIN MACBRIDE SQUERI DAY &
LAMPREY LLP

MICHAEL KIRCHANSKI
MANAGER, HEALTH AND SAFETY
SAN FRANCISCO MUNICIPAL RAILWAY
949 PRESIDIO AVE., ROOM 219
SAN FRANCISCO, CA 94115
FOR: SAN FRANCISCO MUNICIPAL RAILWAY

BILL WOODWARD
AREA INSPECTOR SUPERVISOR
TSA
2919 W. EMPIRE AVENUE
BURBANK, CA 91504
FOR: TSA

E. WAYNE TERRY
CHIEF OFFICER OF OPERATIONS - RAIL
SAN DIEGO TROLLEY, INC.
1255 IMPERIAL AVENUE, STE 900
SAN DIEGO, CA 92101
FOR: SAN DIEGO TROLLEY, INC.

JERRY FECHER
INT'L BROTHERHOOD OF ELECTRICAL WORKERS
7444 TRADE STREET
SAN DIEGO, CA 92121
FOR: INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS

NATHANIEL FORD
EXECUTIVE DIRECTOR / CEO
SFMTA (MUNI)
ONE S. VAN NESS, 7TH FL.
SAN FRANCISCO, CA 94102
FOR: SFMTA (MUNI)

FACILITY/SUBWAY STATIONARY ENGINEERS
STATIONARY ENGINEERS, LOCAL 39
337 VALENCIA STREET
SAN FRANCISCO, CA 94103
FOR: STATIONARY ENGINEERS, LOCAL 39

CABLE CAR CARPENTERS
UNITED BROTHERHOOD OF CARPENTERS L-22
2085 THIRD STREET
SAN FRANCISCO, CA 94107
FOR: UNITED BROTHERHOOD OF CARPENTERS
AND JOINERS

IRWIN LUM
PRESIDENT
TRANSPORT WORKERS UNION - LOCAL 250 A
1508 FILLMORE STREET
SAN FRANCISCO, CA 94115
FOR: TRANSPORT WORKERS UNION - LOCAL
250 A

REGINALD MCCRAY
TRANSIT/SYSTEM SAFETY PERSONNEL
TRANSPORT WORKERS UNION - LOCAL 200
1426 FILLMORE STREET
SAN FRANCISCO, CA 94115
FOR: TRANSPORT WORKERS UNION - LOCAL 200

INT'L BROTHERHOOD/ELECTRICAL WRKS L-6
55 FILLMORE STREET
SAN FRANCISCO, CA 94117
FOR: INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS LOCAL 6

TRYG MCCOY
DEPUTY AIRPORT DIRECTOR
AIR TRAIN
PO BOX 8097
SAN FRANCISCO, CA 94128
FOR: AIR TRAIN

DOROTHY DUGGER
GENERAL MANAGER
BAY AREA RAPID TRANSIT DISTRICT
PO BOX 12688 (LKS-23)
OAKLAND, CA 94604-2688
FOR: BAY AREA RAPID TRANSIT DISTRICT

JEFF LAU
BAY AREA RAPID TRANSIT DISTRICT (BART)
300 LAKESIDE DRIVE, 18TH FL.
OAKLAND, CA 94604-2688
FOR: BAY AREA RAPID TRANSIT DISTRICT
(BART)

JESSE HUNT
AMALGAMATED TRANSPORTATION UNION (ATU)
132 NINTH STREET, STE 100
OAKLAND, CA 94607
FOR: AMALGAMATED TRANSPORTATION UNION
(ATU)

LISA ISLER
SEIU (SERVICE EMPLOYEE INT'L UNION)
100 OAK STREET
OAKLAND, CA 94607
FOR: SEIU

GARY GEE
CHIEF OF BART POLICE
BAY AREA RAPID TRANSIT DISTRICT
800 MADISON / PO BOX 12688
OAKLAND, CA 94607-2688
FOR: BAY AREA RAPID TRANSIT DISTRICT

LEN HARDY
CHIEF SAFETY OFFICER
BAY AREA RAPID TRANSIT DISTRICT
300 LAKESIDE DRIVE, 18TH FL.
OAKLAND, CA 94612
FOR: BAY AREA RAPID TRANSIT DISTRICT

AMALGAMATED TRANSIT UNION (ATU)
1590 LA PRADERA DRIVE
CAMPBELL, CA 95008
FOR: AMALGAMATED TRANSIT UNION, LOCAL
265

BENJAMIN H. SCHARF
SENIOR ASSISTANT COUNSEL
STA. CLARA VALLEY TRANSPORTATION AUTH.
3331 NORTH FIRST STREET - BLDG. C-2
SAN JOSE, CA 95134-1906
FOR: SANTA CLARA VALLEY TRANSPORTATION
AUTHORITY

MARK MAHAFFEY
OPERATIONS MGR. FACILITIES MAINT.& SEC.
SANTA CLARA VALLEY TRANSPORTATION AUTH.
3331 NORTH FIRST STREET, C-1
SAN JOSE, CA 95134-1906
FOR: SANTA CLARA VALLEY TRANSPORTATION
AUTHORITY

MICHAEL BURNS
GENERAL MANAGER
SANTA CLARA VTA
3331 N. FIRST STREET
SAN JOSE, CA 95134-1906
FOR: SANTA CLARA VTA

NANCI EKSTEROWICZ
RISK MANAGER
SANTA CLARA VALLEY TRANSPORT AUTHORITY
3331 NORTH FIRST STREET, B-1
SAN JOSE, CA 95134-1906
FOR: SANTA CLARA VALLEY TRANSPORT
AUTHORITY

PHIL CARTER
BUSINESS REP
PO BOX 1080
ROCKLIN, CA 95677
FOR: SACRAMENTO RTD

LT. MARK SAKAUYE
HEAD OF POLICE SERVICE UNIT
SACRAMENTO REGIONAL TRANSIT DISTRICT
PO BOX 2110
SACRAMENTO, CA 95812
FOR: SACRAMENTO REGIONAL TRANSIT
DISTRICT

MIKE WILEY
INTERIM CEO
SRTD
PO BOX 2110
SACRAMENTO, CA 95812
FOR: SACRAMENTO RAIL TRANSIT DISTRICT

RUFUS FRANCIS
DIRECTOR OF SAFETY
SACRAMENTO REGIONAL TRANSIT DIST.
PO BOX 2110
SACRAMENTO, CA 95812
FOR: SACRAMENTO REGIONAL TRANSIT DIST.

JOSHUA SHAW
EXECUTIVE DIRECTOR
CALIFORNIA TRANSIT ASSOCIATION
1414 K STREET, STE 320
SACRAMENTO, CA 95814
FOR: CALIFORNIA TRANSIT ASSOCIATION

VIC GUERRA
ATU
2776 21ST STREET
SACRAMENTO, CA 95818
FOR: ATU

JAMES P. JONES
UNITED TTRANSP. UNION: CAL. - LO 005
1005 12TH STREET, SUITE 4
SACRAMENTO, CA 95814
FOR: UNITED TRANSPORTATION UNION:
CALIFORNIA - LO 005

SHANE A. GUSMAN
CALIFORNIA CONFERENCE BOARD
1127 11TH STREET, SUITE 501
SACRAMENTO, CA 95814
FOR: THE CALIFORNIA CONFERENCE BOARD OF
THE AMALGAMATED TRANSIT UNION

Information Only

ERIC CONTRERAS
LIGHT RAIL SAFETY
NORTH COUNTY TRANSIT DISTRICT
810 MISSION AVENUE
OCEANSIDE, CA 92054

JOHN I. KENNEDY
CITY OF SAN FRANCISCO
ATTORNEY'S OFFICE
1390 MARKET STREET, 6TH FLOOR
SAN FRANCISCO, CA 94102

MICHAEL J. ROBERT
AIRTRAN ASSISTANT MANAGER
SAN FRANCISCO INTERNATIONAL AIRPORT
PO BOX 8097
SAN FRANCISCO, CA 94128

SHAYNE NELSON
VP-LOCAL 265
AMALGAMATED TRANSIT UNION
1590 LA PRADERA DRIVE
CAMPBELL, CA 95008-1533

MARK LONERGAN
CHIEF OPERATING OFFICER
SACRAMENTO REGIONAL TRANSIT DISTRICT
PO BOX 2110
SACRAMENTO, CA 95812-2110
FOR: SACRAMENTO REGIONAL TRANSIT
DISTRICT

WALT STRINGER
LIGHT RAIL MANAGER
NORTH COUNTY TRANSIT DISTRICT
810 MISSION AVENUE
OCEANSIDE, CA 92054
FOR: NORTH COUNTY TRANSIT DISTRICT
(NCTD)

MARTIN A. MATTES
NOSSAMAN LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111-4799

HARRY L. GORDON
SEIU LOCAL 1021 - BART CHAPTER
1807 FAIRHAVEN CT.
OAKLEY, CA 94561

KEVIN D. ALLMAND
LEGAL COUNSEL
SANTA CLARA COUNTY TRANSIT DISTRICT
3331 N. FIRST STREET, BUILDING C-2
SAN JOSE, CA 95134-1906
FOR: SANTA CLARA VALLEY TRANSPORTATION
AUTHORITY

TIMOTHY SPANGLER
SACRAMENTO REGIONAL TRANSIT DISTRICT
1400 29TH STREET
SACRAMENTO, CA 95816

State Service

CHRISTOPHER POSCHL
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

RICHARD GALLANT
CALIF PUBLIC UTILITIES COMMISSION
RAIL SAFETY & CROSSING BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

CLAUDIA LAM
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
AREA 2-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JASON J. ZELLER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5030
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PATRICK S. BERDGE
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICHARD CLARK
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2205
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

VIRGINIA LAYA
CALIF PUBLIC UTILITIES COMMISSION
RAIL SAFETY & CROSSING BRANCH
AREA 2-B
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

GEORGETTA GREGORY
CALIF PUBLIC UTILITIES COMMISSION
RAIL TRANSIT AND CROSSINGS BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

SUSAN FEYL
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

COLLEEN SULLIVAN
CALIF PUBLIC UTILITIES COMMISSION
SAFETY & RELIABILITY BRANCH
AREA 2-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KIMBERLY KIM
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5021
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL KING
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION AND SAFETY DIVISION
ROOM 2207
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TRAVIS FOSS
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5028
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SERVICE BY U.S. MAIL
from R.08-10-007 Service List

TCU
TCU Headquarters, Local 1315
3 Research Place
Rockville, MD 20850

The Grove Trolley
189 The Grove Drive
Los Angeles, CA 90036

AFSCME Local 3634
514 Shatto Place
Los Angeles, CA 90020

Teamsters Local 911
3888 Cherry Avenue
Long Beach, CA 90807

Americana At Brand Trolley
889 Americana Way, Suite 330
Glendale, CA 91210

Jerry Fecher
Int'l Brotherhood of Electrical
Workers
7444 Trade Street
San Diego, CA 92121

Int'l Fed Prof & Tech Engineers
L-21
1182 Market Street, Rm 425
San Francisco, CA 94102

Facility/Subway Stationary Engineers,
Local 39
337 Valencia Street
San Francisco, CA 94103

Sheet Metal Workers, Local 104
1939 Market Street
San Francisco, CA 94103

Cable Car Carpenters
United Brotherh'd of Carpenters
L-22
2085 Third Street
San Francisco, CA 94107

Irwin Lum
Pres., Transport Workers Union
Local 250A
1508 Fillmore Street
San Francisco, CA 94115

Reginald McCray
Transit/System Safety Personnel
Transport Workers Union-Local 200
1426 Fillmore Street
San Francisco, CA 94115

Tryg McCoy
Depty Airport Dir., Air Train
P. O. Box 8097
San Francisco, CA 94128

Jesse Hunt
Amalgamated Transport Union
132 Ninth Street, Suite 100
Oakland, CA 94607

Lisa Isler
SEIU
100 Oak Street
Oakland, CA 94607

Amalgamated Transit Union
1590 La Pradera Drive
Campbell, CA 95008

Mark Mahaffey
Operations Mgr. Facilities Maint.
Santa Clara Valley Transport Authy
3331 North First Street, C-1
San Jose, CA 95134-1906

Kevin D. Allmand
Legal Counsel
Santa Clara County Transit District
3331 N. First Street, Bldg C-2
San Jose, CA 95134-1906

Operating Engineers - Local 2
828 Mahler Road, Suite B
Burlingame, CA 94010

Int'l Brotherhood Elect Wkrs L6
55 Fillmore Street
San Francisco, CA 94117

Timothy Spangler
Sacramento Regional Transit District
1400 29th Street
Sacramento, CA 95816

Shane A. Gusman
California Conference Board
1127 - 11th Street, Suite 501
Sacramento, CA 95814