

**Blocks 1 thru 12 to be completed by Auditors**

1. Audit Type: Annual Audit	2. Mode/System: SCR	3. Audit Title / Number/Reference: Sounder Commuter Rail Internal Safety Audit 2025-03	4. Classification (Finding/Obsv): FINDING
5. Finding/Obsv.Ref. F-SCR-25-03	6. Auditor, Email & Phone: Mike Flood – Audit Division; (425) 677-8157 Michael.Flood@Soundtransit.org		7. Issued Date: 8/15/2025
8. Description: (of Finding or Observation) F.3- There is insufficient process to ensure consistent and reliable reporting of defective Sounder equipment from BNSF to AMTRAK to Sound Transit. Maintenance Analysis Program Equipment Condition Reports (MAP 21A) are not being used for documenting maintenance defects on coach cars and instead BNSF crews are using non-formal communication to the ST Commuter Rail Maintenance Specialist. Reporting of defects for locomotive and control car units is occurring using the MAP100 forms, although there are some documentation inconsistencies. Both the MAP 21A and MAP 100 forms must be used to document defects found in daily safety inspections of equipment, and to ensure repairs are work-ordered and performed. Sound Transit should provide BNSF with documented procedure(s) for reporting operational defects on coaches, cab/control units, and locomotives and provide training on any new processes for this reporting. 8a. Recommendation (For Observations Only): N/A 8b. References: 49 CFR Part 270.103(p)(k) SSP 3.1.1 Safety Risk Identification			
9. Risk Rating 3C	10. Owner/Assigned Responsible Individual: Dante Tandoc, Manager, Commuter Rail Mechanical	11. Assigned Responsible Division: Asset Management	12. Response Due Date: 8/15/2025

Blocks 13 thru 18 will be completed by the individual responding to the Finding/Observation

13. Finding/Observation Response: The ST Rolling Stock Vertical Group acknowledges there was a gap in the contractor maintenance oversight program. As part of our planned comprehensive maintenance oversight action plan, we will develop standardized procedures for BNSF crews to report defects on locomotive and control car units. 13a. Root Cause (Findings Only): Informal procedures were in place for BNSF crews to report defects of Locomotives and control car units, which resulted in inconsistent reporting methods, and inadequate maintenance oversight by ST Sounder staff.
14. Finding/Observation Implementation Plan a. BNSF/Amtrak: Procedures to be developed between BNSF and AMTRAK. Est. Completion Date: December 31, 2025 b. Create a new ST SOP with instructions outlining the use of MAP21A and MAP100 forms to report equipment defects to AMTRAK. ST SCR Service Operations will coordinate with BNSF to implement the details of the new SOP into the BNSF operating handbook. Est. Completion Date: June 30, 2026



15. Audit Response Form Completed By: (Name and Title) Dante Tandoc, Manager, Commuter Rail Mechanical	16. Today's Date: 8/15/2025	17. Est. Implementation Date: 6/30/2026	18. SAIR / CAP #
Blocks 19 thru 25 to be completed by Auditors			
19. Finding/Observation Implementation Plan Review <input type="checkbox"/> Accept <input type="checkbox"/> Reject	20. Auditor Name / Signature: Date:		
21. Finding/Observation Implementation Verification <input type="checkbox"/> Accept (CLOSE) <input type="checkbox"/> Reject (Remain OPEN)	22. Auditor / Signature: Date:		
23. Description of Verification of Finding/Observation implementation:			
24. Reasons for Implementation Plan or Implementation Verification Rejection by Auditors:			
25. Auditor Director Name / Signature: Date:			