

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

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| 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-25-04 | 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.4- Contract oversight procedures for AMTRAK maintenance are inconsistently followed. (Upgrade of 2024 Observation) Auditors did not find a formal process for requesting, reviewing, and analyzing safety & maintenance records from partner agencies. Without a work order system for AMTRAK maintenance, ST oversight relies on reviewing paper documentation, reducing the effectiveness of ST oversight. Meanwhile, AMTRAK uses their own computer-based work order system for other contracts, such as WSDOT's AMTRAK Cascades service. Paper records were found to be inconsistently delivered to Sound Transit. Sounder maintenance paper records were removed by AMTRAK for use in their internal investigation in February 2025 (with no duplicate records available to ST in the meantime). To date, these records have not been returned to the Holgate location for ST review/use. 8a. Recommendation (For Observations Only): N/A 8b. References: 49 CFR Part 270.103(h) SSP 4.5.2 Maintenance Procedures | | | |
| 9. Risk Rating 4C | 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

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| 13. Finding/Observation Response: The ST Rolling Stock Vertical Group acknowledges the inconsistencies of obtaining AMTRAK maintenance records and data. Although ST Sounder oversight procedures are in place, there is no agreement for AMTRAK to provide "unrestricted access" to Sounder maintenance records. 13a. Root Cause (Findings Only): The original agreement between ST and AMTRAK required Amtrak to provide ST access to their Work-Order Management System (WMS). Follow-up amendments withdrew ST's ability to have access to the WMS system, leading to inconsistent processes to obtain maintenance records and data. | | | |
| 14. Finding/Observation Implementation Plan 1. Revise the ST Mechanical Contract Oversight procedure. 2. Perform monthly maintenance oversight audits. 3. Build a new software application to replace paper forms. | | | |
| 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



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| 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: | |