

**Statutory Notification of PTC System Failures (Form FRA 6180.177)**  
Screenshots of the Proposed Web Form

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# Statutory Notification (PTC) System Failures

Pursuant to 49 U.S.C. § 20157(j)(4), each host railroad operating an FRA-certified PTC system on its PTC-governed main lines, including cut outs, and malfunctions that occur on its PTC-governed main lines, must submit a failure-related notification on a quarterly basis by the due dates in the following table, during the ongoing implementation process. A host railroad must begin submitting monthly notifications (see above) immediately after it finishes fully implementing an FRA-certified and interoperable PTC system on all its PTC-mandated main lines.

...ed Form FRA F 6180.177—of any PTC system initialization failures, cut outs, and malfunctions that occur on its PTC-governed main lines, including cut outs, and malfunctions that occurred on PTC-mandated main lines.<sup>2</sup>

### Reporting Frequency and Due Dates:

- **Any Fully Implemented PTC Systems:** By the 15th of each month following the end of the calendar month during the prior calendar month, if the host railroad has fully implemented the PTC system on all its PTC-mandated main lines.
- **Any Other FRA-certified PTC Systems:** If a host railroad is operating an FRA-certified PTC system but is still in the process of fully implementing the PTC system on its required main lines, it must submit a failure-related notification on a **quarterly** basis by the due dates in the following table, during the ongoing implementation process. A host railroad must begin submitting monthly notifications (see above) immediately after it finishes fully implementing an FRA-certified and interoperable PTC system on all its PTC-mandated main lines.

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Old Password

New Password

Repeat New Password

Cancel
Submit

| Period | Coverage Period         | Due Date   |
|--------|-------------------------|------------|
| Q1     | January 1 - March 31    | April 30   |
| Q2     | April 1 - June 30       | July 31    |
| Q3     | July 1 - September 30   | October 31 |
| Q4     | October 1 - December 31 | January 31 |



Change Password

# Statutory Notification of Positive Train Control (PTC) System Failures

Start Form

Pursuant to 49 U.S.C. § 20157(j)(4), each host railroad operating an FRA-certified PTC system must notify FRA—using this mandatory, web-based Form FRA F 6180.177—of any PTC system initialization failures, cut outs, and malfunctions that occur on its PTC-governed main lines, including those experienced by its tenant railroads. This statutory reporting requirement is temporary and expires on December 31, 2021.<sup>1</sup>

### Reporting Frequency and Due Dates:

- **Any Fully Implemented PTC Systems:** By the 15th of each month, a host railroad must submit a **monthly** notification of any PTC system initialization failures, cut outs, and malfunctions that occurred during the prior calendar month, if the host railroad has fully implemented an FRA-certified and interoperable PTC system on all its PTC-mandated main lines.<sup>2</sup>
- **Any Other FRA-certified PTC Systems:** If a host railroad is operating an FRA-certified PTC system but is still in the process of fully implementing the PTC system on its required main lines, it must submit a failure-related notification on a **quarterly** basis by the due dates in the following table, during the ongoing implementation process. A host railroad must begin submitting monthly notifications (see above) immediately after it finishes fully implementing an FRA-certified and interoperable PTC system on all its PTC-mandated main lines.

| Period | Coverage Period         | Due Date   |
|--------|-------------------------|------------|
| Q1     | January 1 - March 31    | April 30   |
| Q2     | April 1 - June 30       | July 31    |
| Q3     | July 1 - September 30   | October 31 |
| Q4     | October 1 - December 31 | January 31 |





# Statutory Notification of Positive Train Control (PTC) System Failures

Form FRA F 6180.177 OMB Control No. 2130-0553

Railroad:

Total Number of PTC-required Train Miles:

Safety Measures in Place:

Submission Period:

Total Number of Scheduled Attempts at Initialization During Reporting Period:

[Instructions and Definitions](#)

40% progress bar  
Tenant Count: 1  
★ N/A

### Failure Types

- *Failure to Initialize:* Any instance when a PTC system fails to activate on a locomotive or train, unless the PTC system successfully activates during a subsequent attempt in the same location or before entering PTC territory. For the types of PTC systems that do not "initialize" by design, a failed departure test is considered a "failure to initialize" for purposes of this reporting requirement, unless the PTC system successfully passes the departure test during a subsequent attempt in the same location or before entering PTC territory.
- *Cut Out:* Any instance when a PTC system fails to activate on a locomotive or train, unless the PTC system successfully activates during a subsequent attempt in the same location or before entering PTC territory. For the types of PTC systems that do not "initialize" by design, a failed departure test is considered a "failure to initialize" for purposes of this reporting requirement, unless the PTC system successfully passes the departure test during a subsequent attempt in the same location or before entering PTC territory.
- *Malfunction:* Any instance when a PTC system, subsystem, or component fails to perform the functions mandated under 49 U.S.C. 20157(i)(5), 49 CFR part 236, subpart I, or the applicable host railroad's PTC Safety Plan.

| Failure Type                  | Subdivision                                                        | Number of Failures      |
|-------------------------------|--------------------------------------------------------------------|-------------------------|
| Under 49 U.S.C. § 20157(j)(4) | As Reported in the Host Railroad's PTC Implementation Plan (PTCIP) | During Reporting Period |

You have not added any failures. An entry is required.



Railroad: [Dropdown menu]

Submission Period: [Dropdown menu]

Submit Import

40% progress bar, Tenant Count: 1, N/A, + Tenant

Total Number of PTC-required Train Miles [Text input]

Total Number of Scheduled Attempts at Initialization During Reporting Period: [Text input]

Instructions and Definitions

Failure Types

- Failure to Initialize: Any instance when a PTC system fails to activate...
Cut Out: Any instance when a PTC system fails to activate...
Malfunction: Any instance when a PTC system, subsystem, or component fails to perform the functions...

Safety Measures in Place: 49 U.S.C. § 20157(j)(4) requires a railroad to provide in this notification "a description of the safety measures the affected railroad . . . has in place."

Table with 3 columns: Failure Type, Subdivision, Number of Failures

You have not added any failures. An entry is required.

+ Failure



# Statutory Notification of Positive Train Control (PTC) System Failures

Form FRA F 6180.177 OMB Control No. 2130-0553

Railroad: Metro North Commuter Railroad Company

Total Number of PTC-required Train Miles: 5132423

Safety Measures in Place: Our safety measures are all spelled out here. They're quite good however we're always improving.

Submission Period: February 2020

Total Number of Scheduled Attempts at Initialization During Reporting Period: 21513453

Submit Import

+ Instructions and Definitions

Report Complete Tenant Count: 1

Metro North Commuter Railroad Com... ✓

+ Tenant

| Failure Type                  | Subdivision                                                        | Number of Failures      |  |
|-------------------------------|--------------------------------------------------------------------|-------------------------|--|
| Under 49 U.S.C. § 20157(j)(4) | As Reported in the Host Railroad's PTC Implementation Plan (PTCIP) | During Reporting Period |  |
| Cut Outs                      | ABC                                                                | 1                       |  |
| Failures to Initialize        | ABC                                                                | 2                       |  |
| Malfunctions                  | XYZ                                                                | 3                       |  |

+ Failure

# Statutory Notification of Positive Train Control (PTC) System Failures

Form FRA F 6180.177 OMB Control No. 2130-0553

Railroad: Metro North Commuter Railroad Company

Submission Period: February 2020

Total Number of PTC-required Train Miles: 5132423

Total Number of Scheduled Attempts at Initialization During Reporting Period: 21513453

Safety Measures in Place: Our safety measures are all spelled out here. They're quite good however we're always improving.

Submit Import

98% Tenant Count: 2

Metro North Commuter Railroad Com...

N/A

+ Tenant

+ Instructions and Definitions

Tenant Name: Tenant Name

Is the PTC System Governing This Tenant's Operations?

Total Number of Trains Operated on Host Railroad's PTC-governed Main Lines During Reporting Period

| Failure Type                  | Subdivision                                                        | Number of Failures      |
|-------------------------------|--------------------------------------------------------------------|-------------------------|
| Under 49 U.S.C. 5 20157(j)(4) | As Reported in the Host Railroad's PTC Implementation Plan (PTCIP) | During Reporting Period |

You have not added any failures. An entry is required.

+ Failure

Railroad: Metro North Commuter Railroad Compan...

Submission Period: February 2020

Submit Import

Report Complete Tenant Count: 2

Metro North Commuter Railroad Com...

Tenantantant

+ Tenant

Total Number of PTC-required Train Miles: 5132423

Total Number of Scheduled Attempts at Initialization During Reporting Period: 21513453

+ Instructions and Definitions

Tenant Name: Tenantantant

Is the PTC System Governing This Tenant's Operations? [checked]

Total Number of Trains Operated on Host Railroad's PTC-governed Main Lines During Reporting Period: 24

Safety Measures in Place: Our safety measures are all spelled out here. They're quite good however we're always improving.

Table with 3 columns: Failure Type, Subdivision, Number of Failures. Rows include Cut Outs (1), Failures to Initialize (2), Malfunctions (3).

+ Failure



# Statutory Notification of Positive Train Control (PTC) System Failures

Form FRA F 6180.177 OMB Control No. 2130-0553

Railroad:

Metro North Commuter Railroad Company

Total Number of PTC-required Train Miles

5132423

Safety Measures in Place:

Our safety measures are all spelled out here. They're quite good however we're always improving.

Submission Period:

February 2020

Total Number of Scheduled Attempts at Initialization During Reporting Period:

21513453

Submit Import

+ Instructions and Definitions

99% Tenant Count: 2

★ Metro North Commuter Railroad Com... ✓

N/A [trash] [cancel]

+ Tenant

Tenant Name:

Tenant Name

Is the PTC System Governing This Tenant's Operations?

Railroad: Metro North Commuter Railroad Company

Submission Period: February 2020

Submit Import

Report Complete Tenant Count: 2

Metro North Commuter Railroad Com...

Tenantantant

+ Tenant

Total Number of 5132423

Total Number of Reporting Period 21513453

+ Instructions

Tenant Name: Tenantantant

Is the PTC System Governing This Tenant's Operations?

Total Number of Trains Operated on Host Railroad's PTC-governed Main Lines During Reporting Period 24

| Failure Type                  | Subdivision                                                        | Number of Failures      |
|-------------------------------|--------------------------------------------------------------------|-------------------------|
| Under 49 U.S.C. § 20157(j)(4) | As Reported in the Host Railroad's PTC Implementation Plan (PTCIP) | During Reporting Period |
| Cut Outs                      | FSA                                                                | 1                       |
| Failures to Initialize        | GFS                                                                | 2                       |
| Malfunctions                  | MMW                                                                | 3                       |

+ Failure

### Confirm Submission

By clicking "Submit Form", you are confirming that all ptc system failures that occur on PTC-governed main lines, including those experienced by tenant railroads, for the selected reporting period have been reported in this form.

[Return to Form](#) [Submit](#)

Railroad: Metro North Commuter Railroad Company

Submission Period: February 2020

Submit Import

Report Complete Tenant Count: 2

Metro North Commuter Railroad Com...

Tenantanant

+ Tenant

Total Number of ... 5132423

Total Number of Reporting Period ... 21513453

+ Instructions and Definitions

Tenant Name: Tenantanant

Is the PTC System Governing This Tenant's Operations? [checked]

Total Number of Trains Operated on Host Railroad's PTC-governed Main Lines During Reporting Period 24

| Failure Type                  | Subdivision                                                        | Number of Failures      |  |
|-------------------------------|--------------------------------------------------------------------|-------------------------|--|
| Under 49 U.S.C. § 20157(j)(4) | As Reported in the Host Railroad's PTC Implementation Plan (PTCIP) | During Reporting Period |  |
| Cut Outs                      | FSA                                                                | 1                       |  |
| Failures to Initialize        | GFS                                                                | 2                       |  |
| Malfunctions                  | MMW                                                                | 3                       |  |

+ Failure

**Submission Status**

Your submission has been successfully processed.

Ok



**Statutory Notification of PTC System Failures (Form FRA 6180.177)**  
Screenshots of the Proposed Excel Template for Bulk Upload to the  
Web Form



## Sample Excel upload sheet

**Note: data is not real data and is just serving as an example**

| IsTenant | OrganizationName           | IsPTCGoverned | TotalTrainsOperatedOnHost | FailureTypeCode | Subdivision    | TotalFailuresDuringPeriod |
|----------|----------------------------|---------------|---------------------------|-----------------|----------------|---------------------------|
| FALSE    | ABCD                       | TRUE          | 32                        | M               | AMBOY          | 19                        |
| FALSE    | ABCD                       | TRUE          | 32                        | C               | AMBOY          | 10                        |
| FALSE    | ABCD                       | TRUE          | 32                        | I               | AMBOY          | 10                        |
| TRUE     | ACADIANA RAILWAY COMPANY   | TRUE          | 4                         | C               | CROWLEY LINE   | 8                         |
| TRUE     | ACADIANA RAILWAY COMPANY   | TRUE          | 4                         | I               | CROWLEY LINE   | 1                         |
| TRUE     | ACADIANA RAILWAY COMPANY   | TRUE          | 4                         | M               | CROWLEY LINE   | 17                        |
| TRUE     | ACADIANA RAILWAY COMPANY   | TRUE          | 4                         | C               | OPELOUSAS LINE | 17                        |
| TRUE     | ACADIANA RAILWAY COMPANY   | TRUE          | 4                         | I               | OPELOUSAS LINE | 12                        |
| TRUE     | ACADIANA RAILWAY COMPANY   | TRUE          | 4                         | M               | OPELOUSAS LINE | 17                        |
| TRUE     | ADIRONDACK SCENIC RAILROAD | TRUE          | 43                        | C               | ADIRONDACK     | 10                        |
| TRUE     | ADIRONDACK SCENIC RAILROAD | TRUE          | 43                        | C               | SYSTEM         | 7                         |
| TRUE     | ADIRONDACK SCENIC RAILROAD | TRUE          | 43                        | I               | ADIRONDACK     | 18                        |
| TRUE     | ADIRONDACK SCENIC RAILROAD | TRUE          | 43                        | I               | SYSTEM         | 3                         |
| TRUE     | ADIRONDACK SCENIC RAILROAD | TRUE          | 43                        | M               | ADIRONDACK     | 10                        |
| TRUE     | ADIRONDACK SCENIC RAILROAD | TRUE          | 43                        | M               | SYSTEM         | 17                        |
| TRUE     | ALEXANDRIA TRAINS          | FALSE         |                           |                 |                |                           |
| TRUE     | ABERDEEN RAILROAD          | TRUE          | 12                        | C               | PIEDMONT       | 15                        |
| TRUE     | ABERDEEN RAILROAD          | TRUE          | 12                        | I               | PIEDMONT       | 1                         |
| TRUE     | ABERDEEN RAILROAD          | TRUE          | 12                        | M               | PIEDMONT       | 5                         |
| TRUE     | ABERDEEN RAILROAD          | TRUE          | 12                        | C               | SANDHILLS      | 12                        |
| TRUE     | ABERDEEN RAILROAD          | TRUE          | 12                        | I               | SANDHILLS      | 0                         |
| TRUE     | ABERDEEN RAILROAD          | TRUE          | 12                        | M               | SANDHILLS      | 6                         |



## Instructions for Bulk Upload Submitted Data

See the sample submission tab in this template for examples of a proper submission

### Excel Requirements

**The FailureData tab must be the first tab in the spreadsheet**  
**The FailureData tab column order should not be changed**

A value should be submitted for each field in a record for all PTC Governed tenants. Blank or invalid data loaded by bulk upload will be required to be set individually and manually in the application.

### Spreadsheet Field Instructions -- All records

|                         |                                                                                                                                                                                                            |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>IsTenant</b>         | Set to TRUE for all tenant records, including non-governed tenants, FALSE for the submitting railroad.                                                                                                     |
| <b>OrganizationName</b> | Enter any value for the submitting railroad. (The submitter name will be selected from a list using the application.)                                                                                      |
| <b>IsPTCGoverned</b>    | A host railroad's PTCIP is the source for the list of its PTC-governed tenant railroads. If a PTC system is not yet governing a tenant railroad's operations enter FALSE. Enter TRUE for governed tenants. |

### Spreadsheet Field Instructions -- Submitter and Governed Tenants

|                                  |                                                                                                                                              |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| <b>TotalTrainsOperatedOnHost</b> | Enter an integer value.                                                                                                                      |
| <b>FailureTypeCode</b>           | Use the following codes to represent the failure type for a failure record<br>I = Initialization Failures<br>C = Cutouts<br>M = Malfunctions |
| <b>Subdivision</b>               | Enter the subdivision name up to a 100 character limit.                                                                                      |
| <b>TotalFailuresDuringPeriod</b> | Enter an interger value. Use 0 if the tenant did not experience any failures of that type during the reporting                               |

### Upload Spreadsheet Data

When the Excel file data is complete and saved, click the Import Failure Reports button on the main screen. Select the .XLS or .XLSX file to be loaded and clock Open.

## Data reference for Excel upload sheet

| FailureType | Label                  | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| I           | Failures to Initialize | Failures to Initialize: Any instance when a PTC system fails to activate on a locomotive or train, unless the PTC system successfully activates during a subsequent attempt in the same location or before entering PTC territory. For the types of PTC systems that do not “initialize” by design, a failed departure test is considered a “failure to initialize” for purposes of this reporting requirement, unless the PTC system successfully passes the departure test during a subsequent attempt in the same location or before entering PTC territory. |
| C           | Cut Outs               | Any cut out of a PTC system, subsystem, or component en route, including when the PTC system cuts out on its own or a person cuts out the system, unless the cut out was necessary to exit PTC-governed territory and enter non-PTC territory.                                                                                                                                                                                                                                                                                                                  |
| M           | Malfunctions           | Any instance when a PTC system, subsystem, or component fails to perform the functions mandated under 49 U.S.C. 20157(i)(5), 49 CFR part 236, subpart I, or the applicable host railroad’s PTC Safety Plan.                                                                                                                                                                                                                                                                                                                                                     |