

Ottawa Light Rail Commission

Richard France
on Wednesday, April 27, 2022



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OTTAWA LIGHT RAIL COMMISSION
ALSTOM CANADA INC. - RICHARD FRANCE
APRIL 27, 2022

--- Held via Zoom Videoconferencing, with all
participants attending remotely, on the 27th day of
April, 2022, 9:00 a.m. to 12:20 p.m.

1 COMMISSION COUNSEL:

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3 Kate McGrann, Co-Lead Counsel Member

4 Carly Peddle, Litigation Counsel Member

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7 PARTICIPANTS:

8

9 Richard France, Alstom Transport Canada Inc.

10

11 Charles Nieto, In-House Counsel,

12 Alstom Transport Canada Inc.

13

14 Michael Valo, Charles Powell, Lena Wang,

15 Glaholt Bowels LLP

16

17

18 ALSO PRESENT:

19

20 Judith Caputo, Stenographer/Transcriptionist

21 Laila Butt, Virtual Technician

22

23

24

25

INDEX OF EXHIBITS

NUMBER/DESCRIPTION

PAGE NO.

(None.)

* * The following is a list of documents undertaken
to be produced or other items to be followed up * *

INDEX OF UNDERTAKINGS

The documents to be produced are noted by U/T and
appear on the following pages: (None.)

1 -- Upon commencing at 9:01 a.m.

2

3 RICHARD FRANCE: AFFIRMED.

4 KATE McGRANN: Good morning,

5 Mr. France. My name is Kate McGrann, I'm one of

6 the co-lead counsel for the Ottawa Light Rail

7 Transit Public Inquiry.

8 RICHARD FRANCE: Good morning.

9 -- REPORTER'S NOTE: (Experienced
10 virtual connection difficulties).

11 KATE McGRANN: Mr. France, the purpose
12 of today's interview is to obtain your evidence
13 under oath or solemn declaration for use at the
14 Commission's Public Hearings.

15 This will be a collaborative interview,
16 such that my co-counsel, Ms. Peddle, may intervene
17 to ask certain questions. If time permits, your
18 counsels may also ask follow-up questions at the
19 end of this interview.

20 This interview is being transcribed,
21 and the Commission intends to enter this transcript
22 into evidence at the Commission's Public Hearings,
23 either at the hearings or by way of procedural
24 order before the hearing is commenced.

25 The transcript will be posted to the

1 Commission's public website, along with any
2 corrections made to it after it is entered into
3 evidence.

4 The transcript, along with any
5 corrections later made to it, will be shared with
6 the Commission's participants and their counsel on
7 a confidential basis before being entered into
8 evidence.

9 You will be given the opportunity to
10 review your transcript and correct any typos or
11 other errors before the transcript is shared with
12 the participants or entered into evidence. Any
13 non-typographical corrections made will be appended
14 to the transcript.

15 Pursuant to Section 33 (6) of the
16 Public Inquiries Act 2009: A witness at an inquiry
17 shall be deemed to have objected to answer any
18 question asked him or her upon the ground that his
19 or her answer may tend to incriminate the witness,
20 or may tend to establish his or her liability to
21 civil proceedings at the instance of the Crown or
22 of any person, and no answer given by a witness at
23 an inquiry shall be used or be receivable in
24 evidence against him or her in any trial or other
25 proceedings against him or her and thereafter

1 taking place, other than a prosecution for perjury,
2 in giving such evidence.

3 As required by Section 33 (7) of that
4 Act, you are hereby advised that you have the right
5 to object to answer any question under Section 5 of
6 the Canada Evidence Act.

7 If at any point during this interview
8 you need to take a break, please let me know and we
9 will pause the recording.

10 Would you give us a brief overview of
11 your professional experience as it relates to the
12 work that you did on Stage 1 of Ottawa's Light Rail
13 Transit System, please.

14 RICHARD FRANCE: Just my experience
15 with Alstom, I started working for Alstom in 2007
16 on London Underground on the Jubilee Line. So in
17 that capacity, I started off as a systems engineer
18 covering various systems for the rolling stock,
19 what they have there.

20 After a couple of years, I became the
21 acting engineering manager on the Jubilee Line. In
22 the last six months as we were closing the contract
23 due to funding, it went back to the client.

24 Then an opportunity arose in Dublin, as
25 the engineering manager there. So I moved over to

1 Dublin around 2011, and I worked as the engineering
2 manager for the vehicles.

3 And in Dublin, they had a tram system
4 which covered infrastructure and vehicle
5 maintenance. There are comparables to the system
6 that we have in Ottawa.

7 So after being the vehicle engineering
8 manager for a few years, I became the engineering
9 manager for both the vehicle and infrastructure
10 maintenance, where we went through an exercise to
11 merge the two activities together, because there
12 was some synergies between vehicle and
13 infrastructure maintenance.

14 Then around, I want to say around 2018,
15 I became the project manager in Dublin, and I was
16 in that role until I came to Ottawa in June of
17 2019. Actually, I think it was around 2017 I
18 became the project manager in Dublin.

19 So, yeah, I came to Ottawa as a project
20 manager and responsible for, you know, all the
21 different functions that we have in the maintenance
22 organization. I was chairing the engineering,
23 supply chain sourcing, quality, finance and
24 contractual teams that we had, you know, leading
25 the activity that we had to do here in Ottawa.

1 KATE McGRANN: The projects that you
2 describe, were any of those P3 projects?

3 RICHARD FRANCE: So London Underground
4 and Dublin are not really the same P3 sort of
5 makeup that you have here. But I mean there's
6 comparables between the projects nonetheless.

7 KATE McGRANN: And what would the main
8 comparables be, in your view?

9 RICHARD FRANCE: Well, you know, so for
10 any railway operation, you've got an operator,
11 you've got a maintainer, then there's the end
12 client which is the City or the state.

13 And so, you know, the activities that
14 you've got to do are largely the same. But when
15 you're talking about 3P, it's just, you know, how
16 it's put together and the funding, but ultimately,
17 the objective is largely the same. You want to
18 build and -- you know, design and build a system,
19 and then operate and maintain it so that it's
20 moving passengers around every single day. So the
21 concept is pretty much the same.

22 KATE McGRANN: In terms of oversight
23 and accountability, any differences that you saw
24 between the work done in Ottawa and the prior
25 experience you have in London and Dublin?

1 RICHARD FRANCE: Sorry, can I ask a
2 question? At what stage, what do you mean by that?
3 Can you clarify?

4 KATE McGRANN: Sure. To the extent
5 that the work that you did in Dublin or London
6 looked like the kind of work that you're doing in
7 Ottawa with respect to the maintenance piece, just
8 coming at it from a governance and accountability
9 perspective. Any differences between what you saw
10 in Dublin and London as compared to Ottawa?

11 RICHARD FRANCE: So the purpose of what
12 I had to do in Ottawa versus what I did on London
13 Underground and Dublin, it's the same, really.

14 So, you know, project managing and
15 organization that has to execute maintenance, it's
16 precisely the same. There's the same sort of
17 activities where you need to do a prescribed set of
18 preventative maintenance. You know, there's
19 arising corrective work, you've got to plan for
20 more complex maintenance at later stages, like
21 overhauls or asset renewals. You know, there's
22 lots of -- similar things you need to look at like
23 obsolescence management, configuration of the
24 assets and so forth.

25 So, you know, they're very comparable.

1 So I think my background actually from working in
2 Dublin was, you know, a good asset for coming to
3 Ottawa to perform the work that we had to do.

4 I've been working with Alstom for
5 15 years, and predominantly in this maintenance-type
6 activity. So I have a, I think I have a pretty
7 good understanding of the different elements that
8 have to be done to execute that kind of work.

9 KATE McGRANN: So the purpose is the
10 same on all three projects, but from a governance
11 perspective, in terms of who you have access to,
12 who's providing you with instructions, feedback,
13 etcetera; any differences between your prior
14 projects and this one?

15 RICHARD FRANCE: Yeah. So the
16 contractual makeup in Ottawa is certainly unique
17 compared to what I was used to on London
18 Underground and on the Dublin Luas.

19 You know, here we're not really the
20 maintainer. Alstom is a subcontractor to RTM
21 that's the maintainer. So that relationship is
22 stranger than what I'm used to, you know. Because
23 the end -- the operator of this system is OC
24 Transpo. And so it's very strange for the
25 maintainer, or at least what I'm used to, the

1 subcontractor, let's say, not having a direct link
2 to the operator.

3 Because there's an essential piece
4 there, where operations and maintenance go
5 hand-in-hand. You know, there needs to be a very
6 high level of collaboration, you know, close
7 working together to make things work efficiently
8 and smoothly. Because, you know, if you're not
9 careful, you might not succeed as well in a
10 maintenance capacity if the operator and the
11 maintainer are not working extremely close
12 together.

13 So what we have in Ottawa is, you know,
14 Alstom has a very large percentage of the scope of
15 maintenance. We cover the majority of the
16 infrastructure assets, and we maintain the
17 vehicles. But there's a huge disconnect between us
18 and OC Transpo, because we have to work through
19 RTM. So that's been the challenge I've found with
20 the experience in Ottawa, for sure, which I haven't
21 in other locations.

22 KATE McGRANN: Any other challenges on
23 this project that are similar to the one you just
24 described you're experiencing for the first time,
25 as compared to the other projects you've worked on?

1 RICHARD FRANCE: Yeah. So there was
2 difficulties I think with getting started. So when
3 I showed up in June of 2019, you know, majority of
4 construction was completed on the system, and the
5 trains were -- you know, there was lots of trains
6 that were already manufactured, and there was --
7 and then there was little issues that all parties
8 were working through to get ready for service.

9 And my understanding at the time was
10 that, you know, service -- the start of service had
11 been delayed already by a year. And I think a lot
12 of people didn't really believe that they'd be
13 going into service in September 2019, because they
14 thought there was still lots of work to do.

15 So I showed up in this environment
16 where suddenly we had to get to a state where we
17 were ready to be in service, but the people on the
18 ground were very used to the whole thing being
19 delayed, and they were sort of in doubt that
20 actually we would get in service.

21 So we had to sort of quickly turn
22 things around in that short period of time to be
23 ready for service.

24 You know, and then in doing that, as
25 part of a mobilization piece for a project, there

1 is a, you know, lots of things that need to be done
2 in a short time. But we didn't have access to a
3 facility where you can actually do maintenance on
4 the trains.

5 So, you know, there's a learning curve
6 that people need to go through when they start to
7 work on a train for the first time. You know,
8 they've got to figure out new activities, figure
9 out, "okay, well, I need these parts next to where
10 I'm going to do the work." Or, "I need to have
11 these tools." And there's little issues that they
12 need to discuss back and forth between engineering
13 and supply chain.

14 And so when I showed up, we didn't have
15 a place to actually conduct maintenance. So
16 because they were building the trains in MSF1,
17 which was intended to be the maintenance facility
18 after the trains were manufactured, you know, and
19 this manufacturing continued on into after revenue
20 service started.

21 So they had created MSF2, which was
22 going to be a space for maintenance to be started.
23 But when I showed up, we didn't have access to
24 MSF2, it was still a construction site. So there
25 was sort of extra, let's call it rules or

1 regulations required. Sorry, I'm less familiar
2 with the local legislation. But I imagine under
3 Province of Ontario, if something is being used as
4 a construction site, well then there's extra
5 controls and permissions you need to get access to
6 that site.

7 So we didn't really have that space
8 available to us to do maintenance, even though it
9 was intended for that.

10 And then they had been running these
11 trains on the line regularly as part of
12 commissioning. So, you know, where they're testing
13 and commissioning the trains before service, you
14 know, to run them in and see what issues there are.

15 So the trains were clocking mileage,
16 which is, you know, triggering requirements around
17 different maintenance intervals, but we had no
18 place to actually do that work.

19 So immediately before trial running
20 around August, we had lots of the first maintenance
21 level to complete, you know, the 25K inspections.
22 And there was a backlog of wheel turning that
23 hadn't been done on the trains that we had to work
24 through very, very quickly to get ready to start
25 service. Because we couldn't actually run

1 passengers on these trains if we were behind
2 schedule on the maintenance part already. So that
3 was very difficult.

4 And then the other part of, you know,
5 mobilizing to a new site, like MSF2, is there's a
6 level of time needed to set up the maintenance bay
7 with tools, materials, so that you can do the work
8 effectively.

9 And instead, we had to quickly rush
10 over there. We didn't even have a desk or offices
11 setup for supervisors and support staff to sit and
12 lead the team. So the facility was a letdown in
13 the beginning for sure.

14 On the infrastructure side, it was --
15 so Alstom only took over the maintenance of the
16 infrastructure at the revenue service acceptance
17 date, that was in the contract. So we didn't get
18 access to the infrastructure, really, to do work
19 before revenue service started.

20 And it's the same idea for the
21 vehicles. There's a learning curve you go through
22 when you touch the equipment for the first time,
23 you know, so all the activities take a little bit
24 longer. And, you know, you've got to figure things
25 out and like this.

1 So it's a bit of a -- it was a bit of a
2 shame, really, that we didn't have access or decent
3 access to the system before revenue service
4 started.

5 So I know that before I show up, there
6 was discussions to try to get Alstom access to the
7 system beforehand. But I learned that the staff
8 were quite -- Alstom staff were quite frustrated,
9 because they had put something on the plan and it
10 would regularly get rejected.

11 And the feeling was that it was kind of
12 intentionally getting rejected, because they didn't
13 want to give us access to the system early, because
14 we might report problems, and that would link back
15 to the construction and stuff like this. And maybe
16 there would have been a little bit of that, but the
17 idea from the staff would've been, "okay, we'll
18 find these problems earlier, so they won't cause a
19 problem later in service".

20 So there was a lot of politics. So
21 things like that were going on. And I was
22 definitely used to less politics in my other work
23 locations. Generally, there was a very
24 collaborative approach with the client, the
25 operator, where we would work closely together to

1 help each other fulfill our requirements. Where in
2 Ottawa, there was -- I don't know, maybe we call it
3 some bad history that I walked into and had to work
4 through.

5 KATE McGRANN: You joined the Ottawa
6 LRT project in June of 2019, I think, if I've got
7 that right?

8 RICHARD FRANCE: Yeah, it was -- I
9 think the 10th was the first day.

10 KATE McGRANN: Were you stepping into a
11 role that had previously been filled by someone
12 else?

13 RICHARD FRANCE: Yes. The previous
14 project manager was Alban Houssin and he -- yeah,
15 so I took on his role.

16 But at the time they had -- so the
17 individual that hired me, Justin Bulpitt. So he
18 was filling in for Alban in the period that he was
19 off, and then I was hired by Justin and came to
20 Ottawa.

21 KATE McGRANN: Okay. So Alban Houssin
22 was in your role, he left and Justin filled in for
23 him until you joined?

24 RICHARD FRANCE: Yeah. So Alban's
25 reporting line was to Justin at the time, and then

1 when I joined, my reporting line was equally to
2 Justin.

3 KATE McGRANN: And, generally, what was
4 the status of the preparation for Alstom's
5 maintenance work when you joined?

6 RICHARD FRANCE: Yeah, so we were in
7 the mobilization phase. As I mentioned, there's
8 lots of work that needs to be done at that stage.

9 You know, there were -- I guess on the
10 infrastructure maintenance side, the maintenance
11 system was not ready in some respects. And by
12 "maintenance system" I mean we use SAP, we call it
13 GSI. And that interfaces with the client's IMIRS
14 system. So it's the system where all the records
15 are kept and stuff.

16 So we had to get -- for each little
17 activity that you would do as part of preventative
18 maintenance, we would have a task list that the
19 staff would have to go through, and they check off
20 to say, you know, I've done this, I've done this,
21 I've measured this, and like that. And they'd
22 carry out certain tests. So each activity would
23 have a task list.

24 So in the beginning, we didn't have all
25 those setup, because we were missing key

1 information from, you know, the build. And then we
2 didn't have access to the system to really properly
3 create that stuff.

4 So we had to rush to get the
5 maintenance management system set up, particularly,
6 on the infrastructure side. The vehicles, it was a
7 bit better.

8 KATE McGRANN: And so -- go ahead.

9 RICHARD FRANCE: Keep going.

10 KATE McGRANN: No, please, I didn't
11 mean to interrupt you.

12 RICHARD FRANCE: Sorry, I'm just
13 thinking.

14 Yeah, so a lot of the documentation
15 from the infrastructure stuff, we got it very late.
16 There was a bunch of information that was provided,
17 maybe -- I want to say maybe something like
18 May 2019. And the team were only, you know, upon
19 receipt, they were starting to go through it. But
20 there's thousands and thousands of documents that
21 they had to go through.

22 But we should have gotten that
23 information considerably earlier to be able to
24 support with what we needed to do for setting up
25 maintenance activities and stuff.

1 And then sadly, even to this day, we're
2 still missing considerable amounts of information
3 from the original build on the infrastructure.

4 So periodically we got a couple of
5 memory sticks of information with sort of like
6 basic drawings of where equipment is located, and
7 then there were some manuals and like this. But it
8 was missing considerable amounts of what you'd
9 expect to be able to maintain the system.

10 So we did an exercise of, you know, the
11 engineering team we have, did an exercise and went
12 through all those documents and highlighted what
13 sort of stuff was missing, you know, and we
14 created -- for every single system of the infra we
15 created a table that shows, you know, bill
16 materials, maintenance manuals, assembly drawings,
17 calculations, RAMS information. But anyway, it has
18 all the different types of things you'd expect to
19 receive as part of design and build, passed on to
20 maintenance. And then so we colour coded these
21 tables to show what we have and what we don't have.

22 And so there was quite a lot of
23 information that hadn't been provided. And to this
24 day, there's still considerable gaps in the information.

25 So that's been a challenge, you know.

1 And if you take something like software. So
2 software for all the different systems, you have a
3 CTS network, SCADA systems, you know, signalling
4 system, you'd expect to have the original software
5 so that if you needed to rebuild one of those
6 pieces of equipment in the event there's a failure
7 of a motherboard or something, you'd expect to have
8 that software available so you can rebuild it. But
9 the software has not been provided to this day.

10 So alternatively to having the
11 software, you have a system where you create
12 backups, but it's not set up. So things like that,
13 there's clearly, there's clearly been some gaps
14 along the way with the information provided to
15 support all the work.

16 On the vehicle side, you know, less so.
17 Alstom manufactured designed and manufactured the
18 trains. So we didn't need to rely on receiving
19 that information through the contractual route. So
20 you'd expect that that information would be
21 provided from Alstom to OLRT-C, who is the design
22 and build entity, and then transferred up to RTG,
23 down to RTM and then down to Alstom as the
24 maintenance subcontractor. You'd expect to see
25 that kind of route.

1 But for the vehicles, we didn't need to
2 rely on that, because it's the same company. So
3 all the vehicles, we had whatever information we
4 needed. And then Alstom is a very large company,
5 and we have technical experts dotted around the
6 globe that can support with any sort of gap that we
7 may or may not have.

8 Additionally, we are in a good position
9 on vehicles, because they are still manufacturing
10 trains. And while that was happening in the MSF,
11 in Ottawa, it eventually moved to a facility in
12 Brampton where they continued on manufacturing.

13 So that meant that we had good access
14 to spare parts that we needed, if we had any
15 problems. And, you know, extra resource and tools
16 or whatever, you know. So on the vehicles, we were
17 in a much better shape there.

18 But on infrastructure, you know,
19 concerns. Even to this day, I believe we're still
20 missing some of the parts that were supposed to be
21 provided to support maintenance.

22 KATE McGRANN: When you say you're
23 missing some of the parts, is that with respect to
24 one of the maintenance service facilities or
25 something different?

1 RICHARD FRANCE: No. So on the
2 infrastructure, there's a set of parts that are
3 supposed to be delivered to support maintenance
4 work. So I don't know, you'd expect them --
5 sometimes they come in capital spares or, you know,
6 in the contract there's a list of stuff you're
7 supposed to receive so...

8 And we probably received about
9 70 percent of what was supposed to be there.

10 KATE McGRANN: And how -- sorry, go
11 ahead.

12 RICHARD FRANCE: No, go ahead.

13 KATE McGRANN: Has there been a call
14 for any of the parts that you haven't received yet?
15 Like has that gap in provision caused any issues?

16 RICHARD FRANCE: Specific to that list,
17 I can't say. But, you know, there has been some
18 faults on the infrastructure and stuff, where we've
19 been a little delayed because of parts, or
20 information, or, you know, the software and stuff
21 like that. So certainly, yes.

22 It's difficult, I mean, hard to
23 quantify some of these things. And, you know, with
24 the contractual relationship that we have with say
25 -- to RTM over to OLRT-C, and with the City, is

1 very messy in Ottawa. Because if we're missing
2 some parts that were supposed to be provided, then
3 you think, "okay, well we've suffered some harm,
4 because there will be penalties associated with
5 that in the delay in getting things back".

6 So we would try to make a claim and
7 recover our money through RTM over to OLRT-C. But
8 it's set up in such a way that it's really very
9 difficult to actually recover from that situation.

10 I'm coming way off topic on the
11 question, but I found the -- you asked about
12 difficulties and stuff at the start.

13 So the other piece is that -- so on the
14 side of the vehicles, we had a team dedicated to
15 carrying out the warranty activity. And then teams
16 that were supporting with the testing and
17 commissioning and like this. So all that stuff is
18 really good, and it was helping getting the trains
19 to where they needed to be.

20 But at the start, I kind of discovered
21 around the start of revenue service, that there was
22 going to be very little support for warranty-type
23 problems on the infrastructure.

24 The team that was going to be
25 supporting warranty from OLRT-C for the

1 infrastructure equipment, they were rapidly
2 demobilizing and, you know, from what I'm used to,
3 and they weren't really going to go out and fix the
4 problems. They sort of left things for Alstom to
5 deal with, and then to fight back later as part of
6 a claim.

7 But that's -- I don't know, I -- it's
8 not the nicest way to work. Because you'd expect
9 that if you designed and built something, you would
10 honour the product that you've created, and
11 you'd honour the warranty period and proactively
12 try to fix problems so that these issues are
13 bottomed out.

14 Instead, what we've discovered is that
15 these issues were going to be completely passed
16 down to Alstom to deal with, and then we'd have to
17 try to make a recovery of money that we consumed in
18 dealing with these problems, you know, back through
19 claims. And that approach can take years to
20 recover that money. And so that created some
21 considerable problems at the start.

22 KATE McGRANN: I have a couple of
23 follow-up questions based on what you've shared.

24 When you use acronyms, I will try to
25 get us to put the full phrase on the record. So

1 let's start with "MSF", what does that stand for?

2 RICHARD FRANCE: "Maintenance and
3 storage facility".

4 KATE McGRANN: You've mentioned that
5 the -- I think prior to -- well, definitely prior
6 to revenue service availability, but potentially
7 prior to trial running, the trains had been running
8 on the line and clocking mileage, and, therefore,
9 they were triggering preventative maintenance
10 requirements; have I got that right?

11 RICHARD FRANCE: Yes.

12 KATE McGRANN: And one of the items
13 that you mentioned was that there a backlog of
14 wheel turning; is that correct?

15 RICHARD FRANCE: Yeah.

16 KATE McGRANN: What is "wheel turning"?

17 RICHARD FRANCE: So wheels are made out
18 of metal, the rails made out of metal. When the
19 two roll together, you start to create wear on both
20 parts.

21 So the tires, they end up, you know,
22 the profile of the wheel ends up changing with this
23 wear. So you have to do machining exercise with
24 the wheel lathes to restore that profile back to
25 the new profile.

1 So you've got to do that periodically.
2 If you were to leave it for a very, very, very long
3 time, or very long amount of kilometres, you'd end
4 up with profiles that are not conforming to a safe
5 standard. So you can have issues if you didn't
6 machine your wheels periodically, for sure.

7 So we had to do -- you know, there's at
8 least 50 percent of the fleet needed some machining
9 done on the wheels because with all the
10 commissioning runs they had done, they were already
11 over, I think around 30,000 kilometres. So we had
12 to do that.

13 And then there's two other maintenance
14 intervals before that. So there's every
15 10,000 kilometres there's an inspection of the
16 wheels. And every 25,000 kilometres is the first
17 maintenance interval. So we had to do those sort
18 of things to catch up.

19 KATE McGRANN: When you talk about the
20 profile of the wheels, is it basically a question
21 of whether the wheels are perfectly round or not,
22 or is it more complicated than that?

23 RICHARD FRANCE: There's like a
24 flange -- I don't know how to explain without a
25 diagram, tricky.

1 Yeah, there's like a slightly more
2 narrow part on the wheel that goes down the head of
3 the rail in between the rails, so on the insides.
4 And then there's a more flatter part that sits on
5 the top of the rail.

6 So as you wear, the flat surface will
7 hollow out, and then the thin flange part will
8 reduce in thickness. So you've got to restore that
9 so that the flange is thicker and the hollow piece
10 is no longer hollow.

11 KATE McGRANN: You mentioned that with
12 respect to the infrastructure maintenance, that
13 Alstom was not getting access to the infrastructure
14 prior to revenue service availability that it would
15 have wanted; is that fair?

16 RICHARD FRANCE: Absolutely, yeah. I
17 mean, contractually we weren't the owners of the
18 maintenance prior to RSAD, "Revenue Service
19 Acceptance Date".

20 But we wanted to get access so that we
21 could go through the learning curve before revenue
22 service. You know, my understanding is there was
23 discussions with Alban and Claude Jacobs, who was
24 RTM's GM, and people, to get access where they
25 would put sort of activities on the plan.

1 But then the team were telling me those
2 were regularly getting cancelled last minute, so
3 that, you know, and then they felt it was
4 intentional.

5 So, yeah, we didn't have access. And,
6 you know, prior to RSAD, OLRT-C were responsible
7 for the maintenance of the infrastructure. Now the
8 system was built quite a long time before we
9 actually got to service, you know, track and the
10 OCS were built well in advance. You couldn't
11 possibly have testing and commissioning carried out
12 without a track and OCS and other systems.

13 So those things were built a little
14 earlier. Surely there were lots of things that
15 needed to be corrected and dealt with. But they
16 were at a state where they could run trains.

17 Now OLRT-C were meant to be doing the
18 maintenance. To this day, we don't have the
19 maintenance records from them of what was actually
20 done before RSAD. We requested that and could not
21 get it, and that's -- so it's not clear to us
22 whether actually maintenance was being done before
23 start of revenue service. You think, "well, what
24 difference does that make? Alstom is going to take
25 over revenue service".

1 Well, it is significant. Because you
2 want to know where you are in terms of the
3 lifecycle of those assets. Where you are in the
4 maintenance plan to be able to start them off
5 properly. So without that information, we sort of
6 had to make some assumptions about where to start.
7 So, yeah, there was a gap in the records there.
8 And then problems with build records as well, so...

9 KATE McGRANN: On that, the request for
10 maintenance records that were made. Were those
11 requests made by letter? Like if I wanted to go
12 looking at that --

13 RICHARD FRANCE: Yes.

14 KATE MC GRANN: -- exchange, where
15 would I go looking for it?

16 RICHARD FRANCE: "Contractual
17 correspondence" is where we'd put all that stuff.

18 KATE McGRANN: With respect to the
19 assumptions that were made because you couldn't get
20 those records; was any effort made to verify those
21 assumptions with OLRT-C?

22 RICHARD FRANCE: Well, contractually we
23 had no link to OLRT-C, so we'd go through RTM. So
24 our contractual correspondence, let's say, is to
25 RTM. So not directly to OLRT-C, we would need RTM

1 to make that connection.

2 But, you know, we've requested the
3 information by letter and then, you know,
4 informally it had been discussed on occasions. I
5 can't really link back to a set of meeting minutes,
6 because all the discussions at that stage were very
7 sort of meeting-type of discussions, they were
8 informal and not really minuted.

9 So hence why we put the information
10 into letters, because that was the only way that we
11 were actually getting these things recorded.

12 KATE McGRANN: So you make the request
13 for the records, they're not forthcoming. A series
14 of assumptions are made.

15 Was any attempt made to verify those
16 assumptions, or test them through RTM up to RTG,
17 down to OLRT-C, or through any other route?

18 RICHARD FRANCE: So we created our
19 maintenance plan for the infrastructure equipment,
20 you know, based on information we got from RTM for
21 the infrastructure, and then we also used our
22 return of experience. Because Alstom maintains
23 infrastructures in other parts of the world, it's
24 not new to us. So we've got a reference library
25 where we've got information available that says,

1 for this type of equipment, generally we maintain,
2 we do these sort of activities at different
3 intervals. So we call it our reference library, so
4 we have that available.

5 So between the reference library and
6 what information we had from the build, we put
7 together our initial infrastructure maintenance
8 plan. So it started that way.

9 But then you're starting to do track
10 inspections and OCS inspections long after the
11 system was built, so we were sort of seeing
12 problems that needed to be corrected. So it was
13 additional work, really. Additional work for us to
14 deal with those issues right at the beginning,
15 yeah.

16 KATE MC GRANN: Did any of the
17 assumptions that were made about the infrastructure
18 maintenance prove to be incorrect in a way that
19 caused problems or additional challenges for Alstom
20 in its maintenance work?

21 RICHARD FRANCE: You know, we had
22 problems with the OCS clearly, because you know,
23 had things been better maintained prior to us
24 taking over, we would have potentially avoided some
25 of the issues that we saw.

1 And then in the first summer in
2 June 2020, there was sort of a shutdown that was
3 carried out where OLRT-C came in and brought their
4 contractor to correct a number of issues with the
5 OCS. So there were some teething problems there
6 with that system.

7 And on the, I guess I'll call them the
8 telecom systems, there was lots of little issues in
9 the beginning with, you know, various faults on
10 alarms. It's quite apparent in the data, actually.
11 You know, in the start of 2019, the City were
12 coding the work orders. So there's KPMS, key
13 performance metric indicators outlined in the
14 contract that say what type of penalty you get for
15 one type of defect or another.

16 So the City were coding the work orders
17 in the beginning, and they're kind of going around
18 and shaking the systems, pushing these buttons, and
19 checking everything to see what faults would
20 generate. And then they'd raise a work order for
21 the activity. And so we got a big wave of problems
22 in the start of revenue service that shouldn't have
23 been there. They should have been fixed before
24 revenue service because, you know, lots of bugs
25 around the IT system that had to be dealt with.

1 And then that created a big distraction
2 for us, because we were, you know, having to go and
3 respond and deal with these issues rather than
4 focus on some of the other things that we could
5 have been. So that was problematic.

6 You know, we've had a lot of problems
7 with track, really. So in the first summer with
8 the heat, we started seeing a lot of buckling of
9 the rail. For people who don't understand what
10 that is, you sort of -- under the heat, the metal
11 in the rail expands. And if it's not, you know,
12 de-stressed or secured properly, or the bed
13 underneath the track is not nicely packed and
14 stuff, then you'll get the rails squiggling off to
15 the sides like spaghetti.

16 So we saw that quite a bit in the first
17 summer and then again in the second summer. But,
18 you know, issues like that should have been
19 bottomed out in the previous years before. And
20 then there's still, there's still some issues there
21 with the track in the heat in the summer.

22 We did a campaign to tamp the ballast
23 last summer, and that had a positive effect in
24 trying to help the reduce the amount of buckling.
25 But our feeling from that activity was that perhaps

1 the tamping was never properly done in the original
2 build, and it would be very interesting to see the
3 records, the build records of how that activity was
4 done in build to ensure that the ballast was
5 compacted properly and like this.

6 Because if your ballast is loose, then
7 the rail isn't as secure. You have these ties that
8 go across the rails, you know, underneath the rail.
9 And if they're kind of loose, because the ballast
10 which are like rocks, if they're not packed tightly
11 around those things, then they're going to move
12 when the rails are expanding and contracting.

13 So there's underlying problems with the
14 track that have definitely caused this problems or
15 distractions, let's say, from what we prefer to be
16 doing.

17 KATE McGRANN: Jumping back a little
18 bit into some of the information that you've
19 provided.

20 When you were talking about Alstom's
21 desire to gain access to the infrastructure in
22 advance of revenue service availability in order to
23 familiarize yourselves with the system and things
24 like that.

25 You mentioned there was a feeling that

1 scheduled access is being cancelled and maybe
2 that's being done intentionally. Do you know what
3 the basis of that belief was? Why did people feel
4 that the scheduled attendances were being
5 intentionally cancelled?

6 RICHARD FRANCE: I wasn't specifically
7 there at the time. But the feedback I had from the
8 Alstom team would be that they'd put an activity,
9 or they'd put an inspection or something on the
10 plans. So there would be -- in order to get access
11 to the main line to do work in engineering hours,
12 you have to put the activities onto a plan for,
13 basically, you know, RTM and the City to agree and
14 approve, you know. Because you can't just go out
15 and do anything. You have to agree that's part of
16 a plan.

17 So things would get added to this plan,
18 but then last minute it would get cancelled. And
19 it might be cancelled because maybe there's some
20 other priority and they say, "oh, no. We need to
21 do this, and so we're going to cancel your permit.
22 You can't go into that space because we've got to
23 do some other activity".

24 So it could be completely genuine
25 reasons why these things would be canceled, but the

1 team had been trying to get these things on the
2 plan for so long, and they'd constantly be
3 cancelled, they had this perception that whatever
4 they would request, would generally get rejected.
5 So, you know...

6 We brought in an independent contractor
7 to do a survey of the track and the OCS in advance,
8 and we were given a level access for that. But
9 even then, their permits were cancelled on some
10 occasions and they were only really able to inspect
11 a small portion of the main line to sort of see
12 what was going on with the track and the OCS.

13 So I mean, even that, we couldn't do
14 our own sort of due diligence piece in advance,
15 because even our independent contractor was denied
16 access.

17 KATE McGRANN: Who was the independent
18 contractor brought in to do the track survey work?

19 RICHARD FRANCE: We used a company
20 called SYSTRA. So they also carry out maintenance
21 in other parts of the world.

22 KATE McGRANN: Were they able to
23 eventually complete the full scope of work that you
24 had intended for them to do?

25 RICHARD FRANCE: No. Because we wanted

1 them to survey the entire main line, and with the
2 right amount of time to properly carry on an
3 assessment. So, no, they didn't complete it. They
4 were only able to do a portion of the main line and
5 yeah, so...

6 So we hired them to do that survey as
7 well as provide some level of training to our
8 technicians in advance.

9 KATE McGRANN: Were they able to
10 complete the training portion of their mandate?

11 RICHARD FRANCE: Well, I mean you need
12 to be there on the infrastructure to properly do
13 it.

14 So they were able to do some stuff and
15 create a level of familiarization, sure. But
16 definitely not as much as we would have liked.

17 KATE McGRANN: In the limited track
18 survey work that they were able to do, did SYSTRA
19 identify any concerns related to what you've talked
20 about in terms of the ballast and the rail line?

21 RICHARD FRANCE: Well, on the ballast,
22 no. It was very superficial type of things
23 generally is what they are finding. As they walked
24 along the track and looked at fasteners not
25 probably tightened down, or bonds not secured or

1 not in place and stuff like this. So it was very
2 sort of superficial what you can achieve through a
3 visual.

4 So if you don't have a buckling
5 scenario at that point in time, well then they're
6 not going to see that. We only started seeing that
7 stuff later when it really arose as a problem.

8 KATE McGRANN: Did SYSTRA identify any
9 issues in the track survey work that it did that
10 would raise concerns about safety or reliability of
11 service?

12 RICHARD FRANCE: No. I would say
13 they're more minor points, minor points. Again,
14 it's superficial stuff, so you know, security of
15 various components, or a poorly aligned components
16 on the OCS that would cause, you know, potential
17 hazards around, you know, an issue between the
18 pantograph and the OCS, where you can get the OCS
19 wire tangled.

20 In extreme cases, that could lead to a
21 safety-type incident. But the system in Ottawa is
22 segregated from the public, it's all fenced off, so
23 that helps considerably mitigate the risk.

24 But it would be, you know, a problem
25 where, you know, an OCS, the pantograph interface

1 issue could be -- it would be a big disruption for
2 Alstom for recovery of an event where you have
3 that. But again, as I said, it's more superficial
4 stuff.

5 KATE McGRANN: An "OCS" is?

6 RICHARD FRANCE: Sorry. OCS is
7 "Overhead Catenary System".

8 KATE McGRANN: And just a brief
9 explanation of what that system does.

10 RICHARD FRANCE: So your power
11 distribution system, you have electrical
12 substations that are connected to hydro, you know,
13 hydro is providing the power to this network.

14 And then you have a substation that's
15 then feeding -- you know, there's cables that feed
16 to the main line where your OCS is, and you have a
17 copper wire that's basically suspended or floating
18 above the train, and then it's a live part,
19 basically. So it kind of distributes power from a
20 substation to the main line.

21 Excuse me for one second, actually,
22 okay? Pause for a second.

23 KATE McGRANN: Let's take a quick
24 break. It's 9:50, let's come back at 9:55.

25 -- RECESS TAKEN AT 9:51 --

1 -- UPON RESUMING AT 9:54 --

2 KATE McGRANN: Before the break, you
3 were just providing us with a brief explanation of
4 how that overhead catenary system works.

5 You had mentioned that there were
6 issues with overhead catenary system, and I think
7 that the suggestion may have been that those issues
8 were inherited from OLRT-C and resulting from the
9 maintenance work that was or was not done on that
10 system.

11 First of all, is that a fair
12 understanding of your evidence?

13 RICHARD FRANCE: Yeah, I would agree
14 with that.

15 KATE McGRANN: So can you give us some
16 more detail about what issues you were referring
17 to, and how you think they came about?

18 RICHARD FRANCE: Well, to give an
19 example, I mean, we had an OCS dewirement, we call
20 it, so the conductor wire was pulled down. It was
21 quite close to the platform at St. Laurent, if I
22 remember correctly.

23 So we had an issue there, you know, and
24 we did an investigation. And there's like an
25 isolator that that's then fixed to the ceiling in

1 the tunnel, and we did our investigation and
2 concluded that these components had come loose.

3 Now, so had things been maintained
4 properly, surely someone would have spotted that
5 and tightened it up and made sure that was secure.
6 So that's one example.

7 And then we had, you know, other
8 problems where a section insulator was clipping a
9 pantograph and leading to damage to the pantograph
10 carbons. And so we had to go out and figure out
11 where that was happening, and then make a
12 correction to the OCS.

13 Initially there was known problems with
14 the Parafil ropes, Parafil ropes are used to
15 suspend the OCS. And so they, you know, later in
16 that summer shutdown I was talking about, the
17 OLRT-C had organized to do some sort of activity
18 around those ropes. We never actually received the
19 information after the fact to say what they did,
20 and where they did, you know, different
21 interventions.

22 And, you know, this topic of OCS
23 actually featured as part of a remedial plan that
24 was shared with the City, so there's some letters
25 on that. And it's quite well documented about the

1 different scope elements as part of that remedial
2 plan.

3 But the Parafil ropes were one of those
4 pieces, and they had a problem where the terminals
5 were snapping off. So the idea was to put sort of
6 an extra sheathe or a layer of insulation or change
7 the design or something. So we actually never seen
8 the output of the design review of those Parafils,
9 and we don't really know what or where any kind of
10 change was done as part of that first shutdown in
11 the summer of 2020. So things like that.

12 The topic at St. Laurent, actually, is
13 kind of frustrating to me, a little bit because,
14 you know, we did our investigation and concluded
15 that the components had come loose. But then RTM
16 took that and communicated something different to
17 the City, and said that, "well, that was caused by
18 maintenance intervention" where we were hanging a
19 drop lead on the conductor wire that pulled it
20 down. But that wasn't the case at all. So they're
21 twisting it around and saying it was something that
22 we had done rather than being something other than
23 to do with the original build and like that.

24 Just generally, that's sort of a
25 frustration I felt over the time I've been in

1 Ottawa, where we would report something to RTM, who
2 are the maintainer. And your expectation is that
3 they'd sort of go, "yeah, you've got a point here.
4 There's a problem with the construction. Let's
5 pass that on to the builder and invoke the warranty
6 and handle that and deal with it".

7 But instead, you have this shield where
8 RTM were kind of blocking points and saying, well,
9 that's because of your maintenance activity and
10 pushing it back. But they shouldn't be doing that.
11 They should be looking and being objective about it
12 and saying, "well, okay, there's a problem there
13 that is from build, and should be rectified in
14 order to help you take that up with the builder".

15 But the difficulty with the contractual
16 arrangement, or this 3P, let's say, is that the
17 stakeholders involved in the design and
18 construction are pretty much like not entirely, but
19 very closely the same stakeholders that are the
20 maintenance contractor.

21 So OLRT-C and RTM are almost the same
22 entity, in my opinion. And anybody that worked in
23 OLRT-C during the -- prior to revenue service that
24 -- not anybody, that's too bold -- but many people
25 that worked in OLRT-C now actually work in RTM. So

1 they sort of take a more defensive position around
2 the design and build, even though they're now part
3 of the maintainer, they should instead be focusing
4 on, you know, what's the best thing to do to
5 actually deal with the problem and get rid of it.
6 Anyway, frustrating topic for me, that part.

7 KATE McGRANN: This blocking or
8 protective attitude that you're seeing from RTM
9 with respect to the work done by OLRT-C, is that a
10 theme that has continued through to this day in
11 Alstom's relationship with RTM?

12 RICHARD FRANCE: Yeah, in many aspects
13 I would say so, yup.

14 KATE McGRANN: Have you seen any
15 improvements in it, or it's largely the same?

16 RICHARD FRANCE: Largely the same.

17 I mean, I know in the background that
18 there's some stuff that's, you know, for the big
19 topics.

20 Like I talked about the buckling of the
21 rail. So I know that in the background, RTM and
22 OLRT-C, let's say, been having discussions with the
23 engineer of record about what to do with all that.
24 But, you know, Alstom is not involved. It's
25 strange, you know, why would you not involve Alstom

1 who actually carried out the maintenance. It's
2 obvious why we're not involved, it's because
3 clearly it would open the door for us to make a
4 claim around that system not performing properly.

5 So there's -- it's hard for me to say,
6 because I'm not involved, you know, there's those
7 background conversations happening with the
8 engineer of record, is it RTM that's leading that?
9 Is it OLRT-C? You know, we're certainly excluded
10 and it's because of the potential implications for
11 a claim later, that's why we're not involved. But
12 it's a shame.

13 It's not a very -- you know, if you're
14 interested in the passengers, and the public at the
15 end of the day, who want a system that operates
16 really well, and consistently, and has no issues,
17 then you're going to sort of be able to get past
18 the commercial and the politics and come up with,
19 you know, a proper technical solution that's really
20 the right thing to do.

21 But on the infrastructure, there's
22 considerable obstacles. You can sort of see now,
23 you know, Alstom -- I've been with the company for
24 15 years, so maybe I'm bias. But I think actually
25 they're a good company. You know, the brand,

1 they're going to make sure that whatever Alstom
2 does is looked after and handled and improved. So
3 you can see quite a lot of investment and work is
4 happening around vehicle-related stuff. And
5 there's really good stuff happening there.

6 But on the infrastructure, it's a
7 shame. We'd like to apply the same philosophy to
8 all of that, but we're -- there's a lot of
9 obstacles to try to get there.

10 KATE McGRANN: Just so I understand
11 your evidence on RTM's motivation to not invite
12 Alstom to meetings regarding the infrastructure
13 issues that you've identified.

14 The concern there is that Alstom would
15 become privy to information that it could then use
16 to support a claim for damages or other kind of
17 recovery against RTM, RTG or any of the
18 subcontractors; is that it?

19 RICHARD FRANCE: That's my perception.
20 I mean, I wouldn't have evidence, obviously, to say
21 that's why we're excluded. But I mean, I would --
22 you know, my perception is that we're not involved,
23 because of the potential commercial implications
24 that there would be.

25 And that would be similar for various

1 topics, I think, to do with the infrastructure.

2 So there's discussions that happen in
3 the background around the SCADA system, and then
4 the signalling system, CBTC with Thales, and we're
5 not really involved in those discussions. It's
6 hard to say what discussions are taking place, but
7 anecdotally I know they're happening.

8 If we come back to the SCADA, for
9 example. It's apparent to everybody that that
10 system needs a huge clean up exercise for the
11 alarms and events that get recorded in it to be
12 sort of value add. Because there's a lot of
13 information that OC Transpo don't know what it
14 means; Alstom, as a maintainer, don't know what it
15 means; and RTM equally.

16 Because it was handled, in my view,
17 design and implementation of SCADA was handled
18 poorly in the sense that -- you know, my
19 perception, again, and anecdotally, you know, from
20 having meetings with Willowglen, or the designer of
21 that system, that -- my perception is they were
22 given the responsibility of creating it in a very
23 piecemeal way where, you know, here is a package we
24 need you to do; sort that out. And then later, you
25 know, here's the next piece; and it was done like

1 that.

2 Again, I get the sense that it was done
3 like that, but rather than there being some sort of
4 overarching contract that says, you know, "you're
5 going to be responsible for the full SCADA system,
6 and we want you to do all these sort of things so
7 that later when we actually have the final product,
8 we'll be able to understand it".

9 To this day, we can't say, you know,
10 there will be an event code that is in SCADA, but
11 we don't have the logic that explains, when does
12 that occur? What has triggered that, or fault? So
13 there's missing information.

14 And, you know, Willowglen communicated
15 to me that they had to sort of piece things
16 together from the information that they had
17 received as part of the build, and it was very
18 patchy like this.

19 So now coming back to the original
20 question which was, these discussions happening in
21 the background. I know that RTM are having
22 independent conversations with Willowglen to do a
23 sort of a clean-up exercise around SCADA, for
24 example.

25 Now we have not been involved in some

1 of those discussions and, you know, we'd like to.
2 But I think there's probably a limit to what RTM is
3 going to involve us in because of potential
4 commercial implications later.

5 KATE McGRANN: Have requests been made
6 by Alstom to attend these meetings between RTM and
7 subcontractors who did work on the infrastructure?

8 RICHARD FRANCE: Anecdotally -- sorry,
9 not anecdotally. Informally, certainly. But I'm
10 just trying to think of something that we recorded
11 in our correspondence.

12 No, I wouldn't say we explicitly
13 requested to be part of a, you know, a technical
14 review with OLRT-C and the original vendors around,
15 you know, restoring the SCADA system, or resolving
16 the issues around the SCADA system. But, you know,
17 yeah, I wouldn't say formally we sent that in.

18 KATE McGRANN: Informally, what has the
19 response been to requests that Alstom has made to
20 attend these kinds of meetings around
21 infrastructure issues that you've encountered in
22 your maintenance work?

23 RICHARD FRANCE: Just sort of
24 dialogues. Like, you know, I work closely with
25 James Messel, who is involved in that piece, where

1 they're trying to clean up the SCADA system in the
2 background.

3 So, you know, and I actually have a lot
4 of respect for James, actually. He's a very, you
5 know, logic-minded, pragmatic, objective-type
6 person with, you know, an engineering background
7 and wants to try and solve these problems. So he
8 doesn't get too heavily weighed down with the
9 commercial and political stuff. So I like that. I
10 think that's the right way to go about things.

11 So we'll have informal conversations
12 about things like, you know, the clean-up exercise
13 with SCADA. And I would express I would be
14 interested to do that to better the system, so...

15 KATE McGRANN: And what's his response?

16 RICHARD FRANCE: He's generally
17 supportive, you know. Him and I agree on a lot of
18 things on face value. But I don't know necessarily
19 that he has -- you know, just because he agrees,
20 doesn't necessarily give him permission or the
21 authority to have that sort of thing, he still
22 needs to check with, you know, his superiors about
23 whether they involve us or not. Because it's a
24 very, you know, unfortunately, the situation is
25 very commercial.

1 KATE McGRANN: I'm just trying to
2 understand the notion that there are these
3 infrastructure issues that exist that you're
4 encountering, Alstom is encountering in its
5 maintenance work; there are meetings going on about
6 these infrastructure issues that RTM is having with
7 others and Alstom is not invited.

8 So how is it communicated to Alstom
9 that they can't go to these meetings that they
10 would like to go to?

11 RICHARD FRANCE: It's not that you
12 can't. It's just that we're not invited. My
13 perception, again, is there's discussions in the
14 background where there's things like the track, and
15 the SCADA system, and meetings with Thales about
16 problems with their signalling system, and we're
17 just not included in that.

18 KATE McGRANN: And before we walk away
19 from the SCADA system, what does "SCADA" stand for?

20 RICHARD FRANCE: Oh, wow, I'm under
21 pressure. I'm not going to be able to do it. I
22 should be able to answer that really easily.

23 I mean, essentially, what your SCADA
24 system is, you have all these inputs from across
25 the network of, you know, you've got a switch; or

1 you've got a door status; or, you know, things like
2 CCTV cameras; status of different pieces of
3 equipment going across the infrastructure. And
4 your SCADA system is like the system that shows you
5 the state of these different things. So, yeah.

6 KATE McGRANN: And my understanding is
7 that the SCADA system feeds into the IMIRS system
8 which ultimately produces, amongst other things,
9 work orders for the maintenance team; is that fair?

10 RICHARD FRANCE: It doesn't link into
11 IMIRS, that's not true. Actually, the acronym of
12 SCADA is "supervisory control and data
13 acquisition", so that's what it is.

14 So essentially, you've got all these
15 little peripherals, let's say, you know, it could
16 be a switch, it could be something to do with the
17 signalling. It could be in Confederation Line, the
18 CCTV camera are not linked into SCADA but, you
19 know, the same idea. Any sort of thing that could
20 give information or status of how it's behaving,
21 would link back into this SCADA system that then
22 shows you what's going on.

23 So people can sit at a terminal and
24 they'll see an alarm, or they'll see a status of
25 those devices, and that would prompt -- so the

1 OC Transpo who are sitting in the TOCC, where
2 they're controlling what's happening on the system,
3 they would view the SCADA system, and then that
4 would prompt them to request a work order to be
5 raised to fix a problem, or they may actually take
6 some sort of intervention themselves.

7 Like in the tunnels, there's these fans
8 which are for this fire life safety system where in
9 the event of a fire, these fans will run up and
10 blow fumes out of the tunnel. So there's
11 information from the status of those, leading back
12 to SCADA. And depending on that information,
13 OC Transpo might have to suspend service in the
14 tunnel. So it's giving that kind of stuff, so it's
15 a...

16 KATE McGRANN: Okay. So OC Transpo
17 employees are monitoring the SCADA system. And in
18 response to information they receive, they may, for
19 example, enter a work order.

20 RICHARD FRANCE: Yeah.

21 KATE McGRANN: Does that work order get
22 entered into IMIRS?

23 RICHARD FRANCE: Yeah, yeah, precisely,
24 yeah. That's kind of the idea.

25 And then equally there would be

1 maintenance reasons that we would want to look at
2 that SCADA system. So every day, actually, we do a
3 check of the SCADA system to see what alarms and
4 things there are that we might have to go and deal
5 with. And that's in addition to the actual alarms
6 getting reported into IMIRS directly.

7 KATE McGRANN: So OC Transpo monitors
8 SCADA on a sort of ongoing basis, and Alstom takes
9 a look at it once a day at least to also review any
10 alarms that are reported by it?

11 RICHARD FRANCE: Yeah. So we have a
12 daily check, take about 30 minutes to do a daily
13 SCADA check of that system. Technicians, or our
14 signal comms technicians go and have a look. And
15 equally, OC Transpo are monitoring it probably
16 almost 24-7. And if there's various alarms that
17 need attention, they'll raise a -- well, they'll
18 communicate to RTM to raise a work order precisely.

19 So in coming back to my earlier point,
20 actually, there's lots of different alarms and
21 events in SCADA. And between all parties, some of
22 the information we don't know what it's telling us
23 because of the way that SCADA system was designed
24 and built, we don't have a good file that says,
25 this alarm means this. And the logic of how it's

1 programmed, because this and this and this has
2 happened, which triggers that event. So we're sort
3 of missing pieces.

4 And then some of the alarms are like
5 what you call nuisance alarms, where you don't need
6 OC Transpo to see that, because it's not
7 significant enough for them. And these alarms are
8 prioritized, but they're maybe not prioritized in a
9 very good way.

10 So there's a problem leftover from the
11 original design-build and commissioning of that
12 system that they were constantly having to deal
13 with. So it's again, another distraction.

14 KATE McGRANN: I just want to
15 understand the implications for Alstom's
16 maintenance work flowing from the issues that
17 you've identified about the SCADA system.

18 You said it's a nuisance. So I
19 understand that to mean it takes work hours from
20 Alstom staff in order to respond to this. Are
21 there any other implications for the maintenance
22 work as a result of the issues with the SCADA
23 system?

24 RICHARD FRANCE: So when I say
25 "nuisance", it's like a nuisance alarm. It sort of

1 means that alarm is telling you something but it's
2 not significant enough that you need to do
3 anything.

4 But, yeah, the impact of that system
5 being like that, is that information will get
6 reported into IMIRS and then that will prompt a
7 KPM work order where there's a penalty associated
8 with it.

9 So we'll have to be very, very
10 proactive in responding and then rectifying the
11 issue, otherwise, we'll start incurring penalties.

12 So the technicians might already be
13 doing some preventative maintenance activity as
14 part of the schedule, but then there's this
15 distraction where they need to stop that and go and
16 deal with this issue.

17 And if that system was commissioned
18 properly, and all the bugs were addressed as part
19 of the warranty activity, you know, we wouldn't be
20 distracted. We would be focusing on the
21 preventative, and when we're done with that, then
22 we can do other types of initiatives that would
23 help us build the -- well, it would help us improve
24 performance, you know, and streamline and optimize
25 different activities.

1 So I say it's a distraction, because
2 there's other things that we want to do that are
3 more value add for the end customer, and like this.
4 Whereas those, because that system isn't set up
5 right, and they haven't cleaned up the nuisance
6 alarms, and people don't know what the information
7 means that, you know, they're generating this
8 volume of work that has to be dealt with, where
9 otherwise, we wouldn't have had to deal with that.
10 So that's the distraction.

11 KATE McGRANN: "KPM" stands for "key
12 performance measure"; is that right?

13 RICHARD FRANCE: Yeah, key performance
14 measure.

15 It's confusing, maybe it should be
16 "indicator" or something for most people in the
17 industry, but they've gone for "KPM".

18 KATE McGRANN: Let me make sure I
19 understand this correctly.

20 If a KPM work order is triggered, that
21 starts an obligation to respond within a certain
22 period of time or in a certain fashion; is that
23 correct?

24 RICHARD FRANCE: Yeah. So for example,
25 you've got a safety and security-related KPM, you

1 have 30 minutes to respond to the issue and then
2 four hours to fix it.

3 KATE McGRANN: And if the response is
4 not accomplished within the required times, the KPM
5 required times, then penalties are levied against
6 RTM; is that right?

7 RICHARD FRANCE: Yeah, yeah. So if you
8 don't respond in 30 minutes, you would incur a
9 penalty and then you have another 30 minutes to
10 respond. And if you don't respond in that time,
11 you have the penalty again, and it keeps ticking
12 over like this.

13 And then same idea for the
14 rectifications, if you don't fix it in four
15 hours -- so I don't know. That whole piece around
16 KPM work orders, and, you know, let's call it the
17 City behaviour, and then issues leftover from
18 construction and like that. So that piece is a
19 little different than to what I'm used to on other
20 systems.

21 I think -- I suspect, actually, the
22 City probably doesn't want to apply the penalties
23 the way in which it's outlined in the contract.
24 But they're sort of stuck with this contract now
25 and it's very punitive. It's not -- you know,

1 because the end customer who's riding around on the
2 trains, they wouldn't really be disrupted by most
3 of things that are generating those KPM work
4 orders. So it's their -- and I don't think that
5 was the original intent when they set up these KPM
6 work orders in the contract.

7 So if you were to look at the volume of
8 penalties associated with those types of work
9 orders, I mean, they far exceed the revenue that
10 anybody is going to get from maintaining this
11 system.

12 So it's probably a flaw in the
13 contract. They were looking for something that was
14 going to drive a response and quick rectification
15 to these problems, and maybe would categorize
16 different types of issues into different groups so
17 you can do some analysis and trending of those
18 different types of problems and see where you need
19 to improve, you know. I think that's the
20 intention, but it's not really having that effect.

21 And then the way the deductions are
22 applied, it's not right. Not quite right, I don't
23 think. So, you know, a lot of issues are being
24 classed as a safety and security issue, where, you
25 know, maybe they shouldn't be. It's not actually a

1 safety issue for people, and so I think something
2 has become lost there.

3 And in the future, there's, you know,
4 irrespective of how this public inquiry or how
5 future claims go with different stakeholders -- and
6 I'm sure there will be lots of stuff happening in
7 the courts over legal pursuits and like that.

8 Irrespective of how all that stuff
9 goes, there needs to be a resolution to that aspect
10 of the contract. It's not going to work for the
11 30 years. I mean, a different sort of version of
12 what they've got is needed.

13 KATE McGRANN: Just before we leave the
14 SCADA piece. You've described nuisance alarms that
15 are characterized as KPM.

16 At the end of the day, is it the case
17 that the KPM work orders that Alstom is receiving
18 are misprioritizing those orders relative to other
19 work that needs to be done and pulling Alstom staff
20 away from necessary work to make a quick response
21 to unnecessary work; is that basically it?

22 RICHARD FRANCE: Yeah. So safety and
23 security, I keep coming back to that one. Because
24 a lot of deductions are landing in that bucket and
25 so that has a very high priority associated with

1 it, 30-minute response, four-hour rectification.

2 When you look at some of the issues
3 there, and yes, those are defects and problems that
4 need to be fixed, but is it really a four-hour
5 rectification that's required? I challenge that.

6 There's certainly other things that the
7 organizations need to be focusing on to provide,
8 let's say, the best value for the end customer.
9 So, yeah.

10 KATE McGRANN: You mentioned there was
11 infrastructure-related documentation that was
12 received in May of 2019, but that there was
13 information missing. Who was that information to
14 be provided by?

15 RICHARD FRANCE: So as Alstom is the
16 maintenance subcontractor to RTM, we obtain the
17 information from RTM, clearly. In essence, they
18 would get that information from OLRT-C themselves.
19 Whether they get it through RTG or direct from
20 OLRT-C, I don't know. I mean, that's really not my
21 concern.

22 But, you know, the design and build
23 information is going to come from OLRT-C.

24 KATE McGRANN: And you also said that
25 some of that information is still missing, even

1 today; is that right?

2 RICHARD FRANCE: Yeah, yeah. And badly
3 organized, for example.

4 So I question -- I can't possibly know,
5 because I wasn't involved. But I question whether
6 they had a, you know, a documentation manager that
7 was onboard in their team that thought of things
8 like, you know, the naming structure of the
9 documents, and how the things would be organized
10 and stuff like that.

11 You know, I suspect they probably
12 didn't have the right kind of resource involved in
13 a project of this scale to have someone there
14 organizing things so that, you know, the final
15 product of what you've got is like, you know, very
16 organized by the different types of documents.

17 I only say that because having dealt
18 with all the documentation on Dublin, you know,
19 we've designed and built the trains, just like in
20 Ottawa, and so there was that piece.

21 But the infrastructure was designed and
22 built by Transport Infrastructure Ireland, sort of
23 the equivalent of the City. They certainly hired a
24 documentation manager, and they gave some thought
25 to how those documents would be structured and

1 organized. And in the final pack of what we
2 received was very good and very thorough. As my
3 role as the engineering manager, and then less so
4 as the project manager, but as the engineering
5 manager, I spent a very large amount of time going
6 through that stuff and organizing it and seeing
7 what was there.

8 So in comparison of looking at that,
9 and then with what we have in Ottawa is just, you
10 know, there's clearly some gaps in terms of
11 management organization structure about all that
12 stuff, is very poor.

13 KATE McGRANN: You mentioned that your
14 team began compiling tables of missing information.

15 Did those files -- how would I find
16 those files if I were looking for them today?
17 Would they all have a similar title, or what would
18 I be looking for?

19 RICHARD FRANCE: Yes, similar title.
20 So again, every single table we sent by a letter to
21 RTM, probably the word "documentation" is in the
22 title of the letter. "Missing documentation", or
23 "information request", or "document" -- yeah, there
24 would be a series of letters for each one. And
25 then each letter title referred to the system. So

1 SCADA, CBTC, OCS, track, and like that. So there's
2 probably at least a dozen.

3 KATE McGRANN: You described, I think
4 I've got this right. You've used the word "messy"
5 in discussing the relationship that Alstom has with
6 RTM, and then the contractual partners behind that.

7 My notes reflect that that was -- that
8 comment was made with respect to the idea of Alstom
9 being able to pursue claims that it has arising
10 from the infrastructure work that was done.

11 First of all, have I got your evidence
12 right?

13 RICHARD FRANCE: Yeah, I'll talk more
14 about it.

15 So all the defects, and through the
16 infrastructure work passed down to Alstom in the
17 for instance to respond, and rectify, and deal with
18 the issue and like that.

19 And so the concept from RTM is that,
20 "you're the maintainer, you're supposed to deal
21 with everything". But that's not necessarily true,
22 you know.

23 RTM are responsible for the help desk
24 activity, where they get the information from the
25 City about, you know, there's this type of issue,

1 and they're meant to record and categorize those
2 defects and extract as much information as
3 possible. And they have questions that they go
4 through and they answer this stuff and then they
5 assign that to Alstom, so it's immediately a pass
6 down.

7 But I would argue that actually they
8 have enough information at that stage, to be able
9 to say, "well, wait a minute. That's clearly a
10 warranty issue. And OLRT-C, they're the entity
11 giving the warranty. We should give them the
12 opportunity in the first instance to look at that
13 defect".

14 But instead, the approach is, "no, I'll
15 pass it down to Alstom, they can deal with it in
16 the first instance, and then we'll leave them to
17 struggle to make a claim back later over many, many
18 years".

19 So that's -- and I think that's
20 misrepresentation of the true process flow that was
21 intended, I think. So it shouldn't have been
22 passed down to Alstom immediately. There should
23 have been a checkpoint of saying, "well, no, that
24 should go to the construction entity during the
25 warranty period. And if they're not interested,

1 well then we'll give Alstom the opportunity after
2 that".

3 And the reason why I say it's "messy"
4 is because -- so, historically, I'd say there's
5 been less interest in trying to discuss the
6 commercial topics on the project.

7 A lot of meetings with RTM were very
8 operational, like what's the status of the trains
9 today, and execution of maintenance and stuff. But
10 as soon as it came to commercial topics, there was
11 a bit of pushback to avoid discussions. Because
12 that topic around CC defects is very complicated.
13 And so there hasn't been a good level of motivation
14 to discuss those. Instead, it was, "we'll leave it
15 to Alstom sort out via claims".

16 And I kind of knew it was going to be
17 difficult, just before we started revenue service,
18 because I had a, I sort of had an informal -- we
19 had some meetings with the City before, I think it
20 was before trial running, where we were presenting,
21 you know, how we were going to resource things and
22 start in revenue service.

23 And so I think there was a presentation
24 prepared by RTM, but it had some details about how
25 warranty was going to be supported on the vehicles,

1 and then sort of warranties supported on the
2 infrastructure. And it was clear that there wasn't
3 going to be the same level of support on the
4 infrastructure stuff as Alstom was going to provide
5 on the vehicles.

6 And I, informally, I asked Matt Slade
7 at one stage -- and unfortunately, terribly sorry,
8 it's not recorded -- but informally I asked him,
9 "is there a budget available with OLRT-C to
10 actually fund warranty issues?"

11 Because that was my experience. We did
12 an extension in Dublin to the infrastructure where
13 we joined the red and the green line. And the
14 builder most certainly had set aside some money to
15 deal with warranty issues and they were proactive
16 to deal with their problems.

17 But the consensus I got from Matt Slade
18 was that, "well, no, not really".

19 And so discovering that, I realize,
20 well, it's going to be very messy, because the
21 builder of the system isn't going to honour their
22 warranty, because they don't have the budget. And
23 we won't even be able to have the discussion with
24 them about, you know, "Are you interested in fixing
25 this?"

1 "No."

2 "Okay, would you like Alstom to do it?
3 Okay, here would be the price." And then we'd go
4 and do it.

5 There was going be no sort of
6 commercial exchange around that sort of thing. So,
7 yeah, so that's why it's messy. Because it just
8 wasn't set up to handle the warranty problems.

9 KATE McGRANN: When you said at this
10 meeting with the City where there was a
11 presentation with RTM made about maintenance
12 resourcing, it was clear that there wasn't going to
13 be the support for the infrastructure.

14 How is it clear from that meeting?
15 What made it clear?

16 RICHARD FRANCE: Maybe not clear. So
17 John Manconi was the chair of the meeting from
18 OC Transpo, so it might not have been too clear to
19 him. But there was preparation meetings before
20 that -- where the presentation was being created,
21 and there was discussions from Matt Slade who was,
22 you know, he was preparing that slide.

23 And you can see that there wasn't going
24 to be head count. There wasn't going to be lots of
25 people that were going to support that. It would

1 be like, "oh, we'll have a vendor that was involved
2 in the construction that will be there for a little
3 while, and then they'll slip away".

4 So, you know, very poor in my opinion.

5 KATE McGRANN: When you joined in June
6 of 2019, was Alstom's maintenance staff hired and
7 on-site ready to go, or was there still hiring to
8 be done?

9 RICHARD FRANCE: The core team was in
10 place. So there was a couple of roles and stuff
11 where they were recruiting and like that.

12 But I was asked at the time, you know,
13 to have a review. And based on my experience, see
14 what I thought and make changes if necessary.

15 So we hired some additional supervisors
16 on the infrastructure team. Actually, immediately
17 when we got to trial running and revenue service,
18 the impact of this KPM work order thing, it became
19 very apparent that we were going to need a resource
20 looking at that 24-7, just to constantly monitor
21 that. So we brought in an additional group of
22 people, we call them "fleet support". And they
23 would sort of monitor what was going on there.

24 It's kind of a -- it's a little
25 upsetting, actually, for me. Because the help desk

1 entity managed by RTM should really be, you know,
2 offering some of the things that we then had to go
3 and resource.

4 I'd love to have a variation to take
5 control of the help desk or the YCC activity,
6 because it would create some, you know, efficiency
7 improvements for our activities in Alstom.

8 So we had to hire these people that
9 would constantly monitor when work orders were
10 appearing, so that we could make sure the
11 technicians were mobilizing and aware of the fact
12 that there was a defect that had a 30-minute
13 response, and the four-hour rectification time.

14 So I had to bring that in, because we
15 didn't appreciate that those KPM work orders were
16 going to be handled the way they were by the City.

17 Let's see, so...

18 Yeah, I mean, I wouldn't say we were
19 hugely short on resources. But we did go and make
20 adjustments to the organization as we went along
21 and learned that things were a little different and
22 like this. But that exercise is something actually
23 that we do, you know, even today. So month by
24 month we review, you know, head count, the
25 organization structure and make changes, you know,

1 so...

2 KATE McGRANN: I understand that
3 there's a document called the "Minor Deficiencies
4 List".

5 RICHARD FRANCE: Yeah.

6 KATE McGRANN: Did you have access to
7 that list as you were looking at your staffing
8 needs and -- first of all, did you have access to
9 it as you were looking at your staffing needs?

10 RICHARD FRANCE: No. Not really, no.
11 So I was aware of this list, and I
12 think informally I obtained a copy of the -- an old
13 version of the minor deficiencies list from an
14 earlier stage. I think Murray Hill gave that to
15 me. But it wasn't formalized, and I really didn't
16 have any discussions with RTM about it.

17 And, yeah, and then obviously there
18 was -- there would have been -- I can only assume
19 there was work in the background where there would
20 be meetings happening with OLRT-C, and maybe the
21 City, RTM, where they're talking about that list
22 and managing down the open topics. But we weren't
23 party to those kinds of discussions.

24 You know, the minor deficiencies list
25 includes two things. It would be the

1 infrastructure defects and the vehicles. So the
2 other project for rolling stock, they would have
3 the stuff related to the vehicles, but I wasn't
4 involved in that. As a project manager, under the
5 maintenance subcontractor, there was no meetings
6 pertaining to that list.

7 So I suspect actually in the beginning,
8 a lot of the issues that were on that list were
9 probably again reported when we were starting
10 revenue service. You know, I imagine there must
11 have been quite an overlap between the issues that
12 first got reported in September and October of
13 2019. And then, you know, then we'd have to go
14 rush out and respond and rectify these issues, but
15 even though they're on a minor deficiencies list.

16 So that's, in my view, that's noise.
17 It was already a defined list that, in theory, you
18 know, OLRT-C would be working through. Why would
19 you go and create a KPM work order related to that
20 stuff, and then have us distracted again from our
21 other activities?

22 KATE McGRANN: Is there any information
23 that you didn't have, when you were planning for
24 the staff that would be in place at the beginning
25 of passenger revenue service, that would have

1 assisted you in better anticipating the demands
2 that were ultimately put upon Alstom in its
3 maintenance work?

4 RICHARD FRANCE: Sorry. Can you
5 explain that again? I'm just trying to make sure I
6 understand.

7 KATE McGRANN: Yes. As you're planning
8 what your staffing needs are going to be, I
9 understand that you've got information from the
10 Project Agreement and otherwise that would let you
11 know what the system is supposed to look like, how
12 it's anticipated to run, and that would help you
13 anticipate your staffing needs; is that right?

14 RICHARD FRANCE: Uhm-hmm.

15 KATE McGRANN: I guess I'm wondering,
16 is there any information that you wish you had that
17 wasn't given to you, that would've help you to
18 better anticipate what your needs would be once you
19 went into passenger revenue service?

20 RICHARD FRANCE: How the warranty was
21 going to be handled on the infrastructure is an
22 obvious piece.

23 I mean, if I had of known that OLRT-C
24 wasn't really going to honour their warranty, then
25 we would need more people to deal with that

1 activity. But then the awkward piece is that we
2 would have to agree to that commercially as well.
3 I would have been happy to do more work in
4 rectifying warranty issues, but you need a resource
5 for it. So you need to plan ahead, and get the
6 right skill set in so you can handle that.

7 So, you know, there should have been --
8 it's surprising, actually, that there was so little
9 of the conversation about how that warranty effort
10 would be handled as part of the start of revenue
11 service.

12 It's actually, yeah, maybe not enough
13 input at the City level as well. You would expect
14 that the City would be interested as well at a
15 higher level.

16 Other things, let's see. So, yeah, and
17 had I known how the KPM work order type of stuff
18 would have played out, you know, we would have had
19 the fleet support in advance of revenue service.

20 KATE McGRANN: I don't want to cut you
21 off with my next question. Anything else you
22 wanted to add to that answer?

23 RICHARD FRANCE: No, that's probably
24 okay.

25 KATE McGRANN: With respect to the

1 training of Alstom's maintenance staff in advance
2 of opening up to passenger revenue service, were
3 the staff sufficiently trained or were there
4 obstacles to getting them to the level of training
5 you would have wanted before passenger service
6 started?

7 RICHARD FRANCE: You know, they had
8 received basic training, induction training,
9 understanding of how EHS works, you know, they have
10 to go through their ELROR at the time, it's EROR
11 now. There was a lot of the basic trainings that
12 were conducted, you know, high level stuff.

13 But the next piece, as I've sort of
14 alluded to in the beginning, was that, you know,
15 you can sit around and do classroom-type trainings;
16 and that's one part of it. But say that's -- if
17 you look at a training profile of people, you know,
18 maybe 20 percent of what they need to do is sitting
19 around a classroom and covering basic safety
20 training, induction to the quality system, or
21 special processes, or whatever, you know. Where
22 you sit around and someone gives a slide deck and
23 there's a test at the end. But that's probably
24 20 percent of what you should do in training.

25 The rest is hands-on, on-the-job

1 learning, you know, with the equipment. So that's
2 the piece that I would have liked to have improved.
3 And we were at a disadvantage because of one,
4 access to a maintenance facility where you could do
5 work on trains; and two, access to the guideway.

6 Because that hands-on piece, that's
7 significant, in my experience. That's where
8 there's a lot to be learned. People learn more, I
9 think, in a tactile capacity rather than sitting
10 around a classroom flipping through a slide deck.

11 KATE McGRANN: And what were the
12 implications of that limited hands-on experience
13 before going into passenger service for the
14 maintenance work that Alstom was doing?

15 RICHARD FRANCE: Just you're slower to
16 execute maintenance intervals. You have a ramp up
17 to get your takt time for most different tasks.
18 Essentially, you're not achieving the takt time
19 that you would when you're experienced. So it
20 slows everything down, it takes longer to do work.

21 But it's not just the activities
22 themselves. There's sort of, what would I call
23 them? Maybe sort of logistics-type things. You
24 have to move trains around to get them into
25 positions where you can do maintenance. You've got

1 to put a plan in for the infrastructure maintenance
2 and then go through the process of getting the
3 permits, and getting, you know, mobilizing your
4 people onto the main line to do the work.

5 So those are little things that you
6 need to work through to understand the mechanics of
7 how they happen. So there's learning that happened
8 thereafter. And then so you have inefficiencies,
9 because you didn't appreciate something as well as
10 you would have, had you ironed out those problems
11 before service. So that's what I would say.

12 KATE McGRANN: Were there any requests
13 made, in whatever route that they would have gone
14 to, directly through RTM or otherwise, from the
15 City for information to assist their operators and
16 control centre staff of troubleshooting or
17 otherwise, that Alstom did not meet?

18 RICHARD FRANCE: Requests from the City
19 to support with their operations? Have I
20 understood the question right?

21 KATE McGRANN: Yes, I think that's a
22 much clearer way of putting it.

23 RICHARD FRANCE: Let's see. So in the
24 beginning, I seem to recall we had some discussions
25 where we sat down to talk about how to deal with

1 certain types of faults. The City was involved in
2 that, and Alstom. And, you know, because you have
3 this sort of VMOS, and you have a list of fault
4 codes on the trains, and then a description of what
5 you're supposed to do when you have that code.

6 And so there's probably like a half a
7 dozen faults where we worked with the City to come
8 up with, you know, how they would intervene. And I
9 think they essentially took that and created
10 their -- I don't know what they call it -- but I
11 would say like an operating manual or something
12 that says, when you have this fault, follow that.

13 So there were some meetings where we
14 worked together with them. But, it was only sort
15 of high level stuff, only the top view. I would
16 have thought there would be more detail in the --
17 in creating that sort of stuff.

18 So, you know, the fleet support team,
19 after they were hired, they spent a lot of time
20 creating like, you know, flow charts that show, for
21 this type of fault event, here's how you want to
22 have the warranty tech or technician intervene.
23 And here's what the driver can do.

24 So there was a lot of work that that
25 fleet support team did after they were hired and

1 settled in, and like that, to sort of give better
2 information for how we could respond to events in
3 service.

4 And that's a good piece of work that
5 they've done, actually. So we don't really have a
6 good connection to the City to really share what
7 we've done, and then collaborate in terms of how we
8 deal with those faults. We really only have that
9 bit in the beginning on how to deal with the top 6
10 or 7 issues and then -- and that's it.

11 But there's -- Alstoms, you know, can
12 offer a lot of value in terms of how to deal with
13 faults in service. So there's a lot more we can do
14 with working with the City, but we're disconnected
15 there because it has to go through RTM and like
16 that. But it's a shame.

17 KATE McGRANN: Has Alstom attempted to
18 share the information? For example, put together
19 by your fleet team with the City so that they can
20 use it right away?

21 RICHARD FRANCE: So we haven't sent it
22 in a letter. So, yeah, we have not formalized it
23 in that way.

24 But RTM are aware that those things
25 have been created and exist. Not in meeting

1 minutes, or formalized in any kind of way, like by
2 correspondence. But they've been told that we have
3 these things. And, you know, I have said in the
4 past that we'd like to work more with the City to
5 help them build their playbook.

6 But it's just, you know, it's not at
7 the top of the list, let's say, for, you know, all
8 stakeholders, I don't think. So we don't have that
9 direct link to the City do that.

10 You would have thought you'd carve out
11 a work stream where, you know, the City would have,
12 you know, delegates from their side, and then
13 delegates from RTM, and similarly ones from Alstom
14 that would meet regularly to help build that. But
15 that's not set up.

16 KATE McGRANN: Is RTM at least aware of
17 Alstom's views that that would be a useful and
18 helpful exercise to undertake?

19 RICHARD FRANCE: I would say, yes,
20 anecdotally; not formalized, yeah.

21 KATE McGRANN: Is there any reason that
22 Alstom hasn't formally advised RTM that this
23 information is available, that that would be useful
24 for the City to have, or that this sort of
25 collaborative approach to troubleshooting, for

1 example, is something that Alstom thinks should
2 happen?

3 RICHARD FRANCE: Well, we're somewhat
4 preoccupied with the other aspects. Like the, you
5 know, notification of warranty issues, or problems
6 with facilities that are impacting us. We notify
7 them about a lot of different things, so we have to
8 pick and choose, I guess. We can't tell them about
9 everything all at once. Yeah, no particular reason
10 why we haven't formalized that in a letter.

11 I'll step back a sec. You know, that
12 is a very collaborative topic, I would say. And,
13 you know, contractual correspondence, just
14 typically -- well, from what I've experienced here
15 in Ottawa, contractual correspondence typically
16 isn't reserved for collaborative exchanges.

17 So if you want to work collaboratively,
18 you probably shouldn't be sending letters back and
19 forth. You should put those aside, and then you
20 have like working groups where people can share
21 information without prejudice and talk through
22 problems and, you know, some of that sort of stuff
23 might even be commercial, but, you know, I'm saying
24 that you want to work collaboratively around
25 helping the City to develop their troubleshooting

1 or intervention guides, is sort of not the typical
2 type of stuff that we exchange in letters.

3 KATE McGRANN: Getting into the trial
4 running phase. What was your view of the
5 maintenance team's readiness for trial running?

6 RICHARD FRANCE: I don't think anybody
7 was really ready for it.

8 KATE McGRANN: And why do you say that?

9 RICHARD FRANCE: And all stakeholders,
10 you know. So we didn't -- I guess we sort of spoke
11 about what we'd be doing, but we sort of just
12 jumped -- dropped in the deep end about how, you
13 know, it's like as part of the trial running, we
14 just flicked a switch and everything was up and
15 running and live. And then you go from sort of
16 0 to 100 percent overnight, and then you're now
17 trying to do everything exactly as you would three
18 years in, when you're perfectly efficient.

19 So it was a bit of a shock to
20 everybody. And like I said, so the KPM work order
21 topic, so we were caught by surprise with how that
22 was going to be handled, for sure. So there was
23 regular reviews around how trial running was going
24 on a daily basis. We weren't involved in that, so
25 that again made it difficult to adapt and make

1 changes, because we didn't have a seat at the table
2 where RTM and the City are sort of discussing the
3 status of the previous day's performance. And then
4 there would be issues that we did raise, and you'd
5 sort of -- it would be communicated after the fact,
6 you know, outside those meetings.

7 So we didn't have good visibility of
8 actually what was going on in trial running. But
9 at the same time, we had our maintenance plan, and
10 the objective was to offer, you know, certain
11 number of trains that are ready for service every
12 morning as in they've had their daily inspections,
13 the daily cleaning, and then the maintenance
14 schedule is all up-to-date. So there's no
15 outstanding defects that would make the train not
16 serviceable.

17 So that was, for our point of view,
18 that's what we were trying to achieve, was having
19 trains for trial running or a service every day.
20 So that objective is kind of unchanged.

21 And then on the infra side, it was
22 because of the KPM work orders, we didn't know how
23 things were trending, because it was suddenly just,
24 you know, we were getting evaluated against
25 response and rectification time, and then not

1 getting the feedback about how that was going. So,
2 yeah. Yeah, so that was essentially trial running.

3 KATE MC GRANN: So Alstom's maintenance
4 role during trial running was to have the trains
5 ready at the start of every day, and try to keep
6 them running all day; is that fair?

7 RICHARD FRANCE: Well, it's a test of
8 normal revenue service. So we had to do the same
9 things as if they're in revenue service. And so
10 that ensures, or that involves making sure that the
11 trains are serviceable.

12 So, you know, and meeting the quantity.
13 And then equally if a train had a fault in service,
14 it's going to affect your availability score. And
15 just like as if it was -- as if it was revenue
16 service. So the target is kind of -- or the
17 objective is the same.

18 But it was -- you would have thought
19 that the performance scheme would ramp up gradually
20 over a number of months. You know, I think to go
21 from 0 to 100 overnight and say, "okay, you're
22 going to achieve this in two weeks, and that will
23 be the test that you're ready for service." That's
24 not a great way to do it. You'd be better off
25 having a gradual ramp up on the performance scheme

1 in a more -- I'll call it trial running over a
2 longer period, where you can take more time to see
3 where things are going wrong, and then make the
4 changes.

5 So in the rail industry, my experience
6 is generally that you identify a problem and then
7 want to make a fix, it doesn't happen overnight.
8 It can take a bit of time to implement the
9 improvement you need to see.

10 So a short two-week trial running type
11 of thing, it's like, okay, well here's a list of
12 problems, but you're not going to fix it by
13 tomorrow, so...

14 KATE McGRANN: In terms of the efforts
15 to have the required number of trains ready at the
16 start of every day; how successful were those
17 efforts?

18 RICHARD FRANCE: Hard to remember,
19 actually. Because I'm sort of thinking what were
20 the exact numbers each day. I'm sure we weren't
21 perfect. I can't say how successful we were.

22 I mean, I know trial running ultimately
23 was a fail. And then, you know, everybody knew we
24 failed the trial running. We didn't score well
25 enough in all areas to actually get through the

1 gate. And I don't -- I'm not privy to the
2 decisions that were made, or discussions had about
3 why we made it past trial running, but for whatever
4 reason, we moved into service.

5 But if you were going at face value for
6 what we needed to do to get past trial running, we
7 didn't achieve that.

8 It's not just trains being available
9 and the availability performance. You also come
10 back to how you handle KPM work orders, and stuff
11 that's not in Alstom's scope, you have station
12 availability and cleanliness and stuff like that.
13 So there were issues in a lot of areas that
14 prevented from the appropriate scoring to be
15 achieved.

16 KATE McGRANN: And you said that in
17 your view, none of the stakeholders were ready for
18 trial running.

19 Other than the KPM issue, what led to
20 your belief that none of the stakeholders were
21 ready for trial running?

22 RICHARD FRANCE: Well, you know, people
23 weren't ready to go to a -- from a state where we
24 weren't running trains every day, to suddenly
25 requiring the maximum amount of trains and then

1 like, you know, very efficiently dealing with the
2 KPM work orders.

3 It would have been more appropriate to
4 see a gradual increase of the availability. You
5 know, instead of having 15 trains in the initial
6 peak, you'd have maybe 11. Or maybe even start
7 lower, like 7 and then up to 11 and then up to 13.
8 You'd have a gradual ramp up instead of just
9 flicking it on to 15 right at the start.

10 So nobody was ready to go up to 15 for
11 morning peak in terms of the trains. You know, and
12 that's cascaded by, you know, the backlog of
13 maintenance, the -- before we had access to MSF,
14 and the, you know, limited time and access to get
15 familiar with the activities, you know.

16 So like I said, we were slow, the takt
17 times around different activities was longer than
18 you'd expect because we were less familiar with it,
19 because we didn't have enough time to go through
20 that learning curve. So it's no surprise, really,
21 that we struggled to achieve the trial running
22 targets.

23 KATE McGRANN: With respect to the City
24 as operator of the system, why was it your view
25 that the City wasn't ready for trial running?

1 RICHARD FRANCE: Well, okay. So if I
2 think -- so the City's role is the operator, right?
3 So similar sort of thing, they're learning to
4 operate the trains.

5 So I guess my statement earlier where I
6 said nobody was ready, I probably can't speak on
7 behalf of the City. So I retract that.

8 But the City had to go through things
9 as the operator, and there was a learning curve for
10 them as well. They had little issues with how to
11 handle faults in service, and how to report things,
12 how to deal with -- how to intervene and deal with
13 faults in service, for sure.

14 So it's such a long time ago, it's hard
15 for me to say, you know, what portion of the
16 problem was attributed to that, and what was more
17 to the maintenance. I mean, certainly as part of
18 trial running, they would have looked to exclude
19 operator-related impacts.

20 So I don't think that would have
21 affected the score for trial running, because, you
22 know, anything that was caught --

23 [Virtual connection difficulties].

24 -- REPORTER'S NOTE: (Whereupon a
25 portion of the record was read as recorded above.)

1 RICHARD FRANCE: Yeah, so
2 operator-related impacts would have been classed as
3 non-Project Co cause. So they would have filtered
4 out those events from the data set, let's say,
5 that's used to determine the scoring against trial
6 running.

7 So I think it probably -- yeah, the
8 impacts of the operator, the City let's say,
9 wouldn't have, you know, affected necessarily, or
10 directly affected our ability to get through trial
11 running.

12 But what I mean by when I say "all",
13 because I said, "all stakeholders weren't ready".
14 What I meant by that was really, you know, there
15 was -- in all areas, there was lots of things that
16 still needed to be done. I mean, it was, you know,
17 lots of mobilization activities from everybody. It
18 was -- everybody was rushing to get ready for this
19 revenue service start, so...

20 KATE McGRANN: You said earlier that
21 there was a general belief that while the message
22 was prepared for trial running, the trial running
23 would not proceed as scheduled; do I have that
24 right?

25 RICHARD FRANCE: Message was -- say

1 again.

2 KATE McGRANN: That while trial running
3 dates had been set, that there was a general belief
4 that they wouldn't proceed as scheduled; do I have
5 that right?

6 RICHARD FRANCE: Well, I mean, much
7 earlier I was mentioning that people didn't think
8 we'd be going into service in September of 2019.
9 There was sort of a general consensus amongst
10 people that had been there for longer that, you
11 know, the date would probably get extended again.

12 But then sure enough, actually that was
13 the date and we were going to go into revenue
14 service. And it was kind of like a "ready or not"
15 sort of thing. And so some dates were set in the
16 calendar, and I -- you know, it wasn't necessarily
17 whether you're genuinely ready. It was more about,
18 you know, let's say, we've got to go into service
19 and that's that.

20 So, you know, because in Alstoms, we
21 follow a development-for-quality type process, you
22 know, for all of our different activities. So in
23 the case of maintenance, we'd have a series of gate
24 reviews that you go through to get ready for a
25 maintenance project. And prior to service, you'd

1 have, I think a readiness gate review. And in that
2 there's a lot of deliverables that we would look to
3 see if, you know, you have to achieve this, or have
4 this information or whatever, in order to get
5 through that gate and start revenue service.

6 So that kind of approach was certainly
7 not a -- you know, it was not done to determine
8 whether people were ready. You know, that's sort
9 of a -- well, let's call it maybe a risk assessment
10 to say whether we're good and safe and ready to go
11 into service.

12 So like an Alstom style development for
13 quality checklist where we say, have you got, you
14 know, everything from -- like everything
15 engineering-wise that you need. Your maintenance
16 system is set up; instructions are available; the
17 organization is set; you have like commercial
18 things set up and defined; and people with all the
19 training and all this. And, do you have the spare
20 parts, and tools, and software, you know.

21 So this checklist that we follow, for a
22 maintenance project, we have a readiness gate
23 review. It's clear that at a higher level, let's
24 call it at the City level, which you'd pass on to
25 the Project Co, or RTM, OLRT-C and RTG, that kind

1 of assessment, you know, that sort of detailed
2 assessment about whether everybody was ready. That
3 wasn't done in any kind of detail that I would have
4 expected.

5 So, you know, because if someone was
6 independently going through and meeting with all
7 the key stakeholders, RTM, OLRT-C, Alstom, if they
8 had a direct access to Alstom, they'd say, "have
9 you got this? Have you got that?" You know, to
10 assess whether they were ready to start.

11 And I was sort of saying like "risk
12 assessment", because it's sort of the assessment
13 that you do to determine if you are in a good state
14 to start performing in revenue service. That
15 wasn't done in a way that I would have expected.

16 When I worked in, you know, Dublin, the
17 safety authority there, you know, they were a
18 bit -- they would scrutinize that kind of stuff in
19 a greater level of detail to ensure that everything
20 you need would be in place and ready for revenue
21 service.

22 So it was a lot of the things I've
23 already discussed that, you know, highlight, you
24 know, the issues. Like, we don't have the
25 information; don't have the software; you know, all

1 the documentation; no access to the system to be
2 able to learn. Like those would have been blocking
3 points as part of that process in my prior
4 experience.

5 And when we did our review, you know,
6 like that was, you know, the handover of the
7 information was certainly a gap that concerned us
8 as a key blocking point. And spare parts on the
9 infrastructure I mentioned, so...

10 So I question a little bit how the City
11 had determined themselves that everything was good
12 to start, you know, like I know that they had some
13 consultants onboard to help with the safety
14 assessment like this, but where is the evidence and
15 the backup and all that, to show that the due
16 diligence has been done by both the City and the
17 independent safety assessor.

18 And then, you know, and then even who's
19 doing the regulation piece to say, you know, "all
20 the pieces are good and this system is going to run
21 effectively".

22 It was kind of done -- and it's
23 difficult for me to speak to it, because I know
24 I'll have less visibility than other stakeholders,
25 but my perception is that it is not done in the

1 same way that you'd experience on a different
2 system.

3 KATE McGRANN: When you said that --
4 sorry, go ahead.

5 RICHARD FRANCE: So I think in part, I
6 think the City was probably going through a lot of
7 learning themselves.

8 They had involved the consultants that
9 they did, maybe they should have looked further
10 afield to other entities that could have supported,
11 you know. You look at -- the City is -- they're
12 the operator of this system, but they never
13 operated -- well, I almost said something wrong --
14 they operated the Trillium Line.

15 But generally, their experience in
16 railway operations is not what you'd get from some
17 of these other world class operators around the
18 world like Keolis, Transdev, Deutsche Bahn, and
19 stuff like that. There's other operators out there
20 where they could have really, you know, brought on
21 board the experience or support to sort of help
22 them in the beginning. So there's a lot of
23 learning on the City side.

24 KATE McGRANN: When you said that, for
25 example, the missing information that you had

1 identified earlier would have served as a blocking
2 point in your experience from the Dublin line, for
3 example. Is a blocking point -- what does it mean
4 that something is a blocking point? Does that mean
5 that you cannot proceed towards revenue service
6 without first rectifying the issue?

7 RICHARD FRANCE: Yeah. In our process
8 for any kind of gate review, like I said, readiness
9 gate review, you have we call them KO, and not KO.
10 So KO is knock out.

11 So there would be a question in the
12 pack that says, "if you haven't fulfilled the
13 requirements of this question, then that's a
14 knockout." That's a no-go. You won't be able to
15 proceed and you'll have to do some -- you'll have
16 to create an action plan, essentially. So to
17 quickly address those concerns before you really
18 can proceed forward.

19 So some of the questions would be
20 knockout questions where you can't go ahead. And
21 others are not knockout questions where, okay,
22 those are issues, but you can define some actions
23 and with time scales, and address them accordingly.

24 So like I said, there was some gaps for
25 us because, you know, missing key pieces of

1 information, warranty protocol wasn't really well
2 understood, in how that was going to be handled and
3 like this.

4 But we were sort of led to believe
5 that, "okay, no, we're going to give you whatever
6 you need. And if you don't have something, you
7 request it and you'll get it".

8 And then, "okay, the warranty will be
9 handled like this, you'll go and respond to it and
10 then make a claim later".

11 Well, okay, that's not -- it's not
12 necessarily the right way.

13 KATE McGRANN: On the eve of passenger
14 revenue service, were there any outstanding issues
15 that you believe would have been knockout type
16 issues based on your prior experience?

17 RICHARD FRANCE: Yeah, probably not
18 really. So I'm leaning towards, no.

19 But I think there was a significant
20 portion of stuff that wouldn't have been a knockout
21 that would be very concerning for starting up.

22 KATE McGRANN: With respect to trial
23 running, was there -- what kind of information did
24 you get about the performance of the system, that
25 you could use to sort of help respond -- you know,

1 to better prepare for the next day or better
2 prepare for revenue service?

3 RICHARD FRANCE: So as I said, we
4 weren't really involved in the meetings. So, you
5 know, they had like a scoreboard set up where there
6 was how they're performing in each of the different
7 areas: Work orders, station availability, train
8 availability, stuff like that.

9 So there was a scoreboard, and it was
10 set up in one of the meeting rooms, but we weren't
11 invited. You can kind of go into the meeting room
12 afterward and you can see the scoreboard, which
13 would give you some idea, but you missed the
14 discussion.

15 So the only thing we would learn is
16 what would be told to us from RTM after the fact.
17 So there were problems around the work orders, for
18 sure, because they mentioned that. But, you know,
19 there's a lot missed by not being there front and
20 centre with everybody.

21 I think towards the end of the trial,
22 because it's a long time ago now, so I'm not sure
23 if we were invited at the very end or not, but it
24 was certainly after the fact, so...

25 KATE McGRANN: The issues with the work

1 orders, what specifically was the issue that was
2 encountered?

3 RICHARD FRANCE: Well, you know, if you
4 haven't responded or rectified the issues, you
5 know, in the time scales, well then you're not
6 going to achieve the requirement under trial
7 runnings. So you'd fail in those areas.

8 It's going back a long time, but those
9 work orders have failure points attributed. So I
10 suspect -- and it's so long ago, but I suspect
11 they're probably looking at quantity of failure
12 points as part of trial running to decide whether
13 things were okay or not. But I don't know, so this
14 is going back a long time.

15 KATE McGRANN: If you can recall, with
16 respect to the work orders, was it the case that
17 there was an unexpected volume of work orders?

18 Was it the case that they were being
19 entered in a fashion that made it difficult for
20 them to respond to? Was there something unexpected
21 about the way they played out that made things
22 difficult for --

23 RICHARD FRANCE: The volume in August
24 and September of those work orders was enormous.
25 And part of that is, I think, the City took the

1 responsibility for coding those work orders in the
2 beginning. And I think later RTM realized that
3 that activity was meant to be done by them as part
4 of the help desk. So they took control over the
5 work order creation, and they set up a process for
6 OC Transpo to communicate the issues to them. So
7 then that helped to filter things out and slow them
8 down.

9 But the other part is, I'm pretty sure
10 the City were going around, and you call it
11 "shaking the tree". And they're going around and
12 like touching buttons and inspecting everything,
13 and pointing out all the problems that were there.
14 So that meant there was like lots and lots of work
15 orders generated in the beginning.

16 Because I think their view was that,
17 "look, we should be ready to start. These defects
18 shouldn't be present". But then, you know, if I
19 were to have the MDL and to crosscheck against it,
20 you'd probably find that some of those issues were
21 already on that list. So, yeah.

22 KATE McGRANN: And the "MDL" is the
23 "Minor Deficiencies List"?

24 RICHARD FRANCE: Yes.

25 KATE McGRANN: When you said that it

1 started out with the City coding work orders, and
2 then that changed to RTM; do you remember when that
3 change took place?

4 RICHARD FRANCE: I feel like around
5 maybe November or December. And then certainly by
6 January, it was under RTM's control.

7 KATE McGRANN: So November-December 2019?

8 RICHARD FRANCE: Yes, of course.
9 November-December 2019, and then under their
10 control by January for sure.

11 KATE McGRANN: And are we talking about
12 who's operating the help desk; is that what it was?

13 RICHARD FRANCE: Well, it was always
14 RTM operating the help desk via YCC. But from the
15 TOCC, the City were going into IMIRS themselves and
16 creating the work orders. And then instead, that
17 was passed over to RTM.

18 You probably think, well, what's the
19 difference? But there's a question set you have to
20 go through where you sort of, you go through the
21 defects to get the right KPM and like that.

22 So there's fewer people that work in
23 RTM's YCC. And so you're able to better train
24 those people in isolation. Whereas at the City
25 level, there's probably more people that are doing

1 the work order entry, so maybe that's an aspect to
2 it. But, yeah...

3 KATE McGRANN: What changes did you see
4 once RTM took over entering the information into
5 IMIRS?

6 RICHARD FRANCE: Well, the number of
7 work orders dropped enormously. It's easy to plot
8 the number of work orders generated in, you know,
9 August, September, October, November, and then into
10 2020. You know, 2019 into 2020. You can see like
11 a significant shift in the quantity of work orders.
12 So there was a -- so there was that kind of a
13 change.

14 KATE McGRANN: And did you attribute
15 that drop in the number of work orders to RTM's
16 approach to entering them? Or could it also have
17 been affected by the number of work orders that had
18 already been responded to since the inception of
19 passenger service?

20 RICHARD FRANCE: I would say in part
21 it's to the data entry, probably in the background
22 there's some discussions between RTM and the City
23 about how to handle this sort of stuff. Because
24 for sure, it would have been escalated to the City
25 from RTM that, look, this approach is not quite

1 right. And I think people probably would have
2 changed their approach as well.

3 So it's not necessarily just people
4 entering them into the system. There would have
5 been discussions had, and then a change in people
6 as well, a few factors there. It's a bit
7 behavioral type of stuff, you know, yeah.

8 KATE McGRANN: Other than a decrease in
9 the number of work orders, did you see any other
10 changes when RTM took over?

11 So for example, did you see different
12 categorizations of the same kinds of requests that
13 had an impact on how you approached maintenance or
14 anything like that?

15 RICHARD FRANCE: Well, so you would
16 have filtered out -- like by RTM taking control of
17 the coding, it was more likely that the correct KPM
18 would be assigned to the work order.

19 I refer back to safety and security
20 before. So there would have been tons and tons of
21 safety and security events that we would have had
22 to have responded and rectified in 2019 when
23 OC Transpo was doing it. But then when RTM took
24 control, and they were applying the question set
25 that was in IMIRS, you know, they were guessing the

1 right KPM on there. So there were fewer things
2 like safety and security and stuff like that, that
3 we'd have to go out and deal with really quickly.
4 So it helped for sure.

5 KATE McGRANN: Does the KPM issue
6 persist to this day, to some extent?

7 RICHARD FRANCE: Yeah. There are still
8 issues that haven't been, like, you know, the
9 handling of those work orders. There's lots of
10 things that need to be addressed to this day.

11 You know, I'll break them into
12 categories. There's underlying issues that still
13 exist from construction that need to have a proper
14 solution.

15 And then there's, you know, still the
16 handling of those work orders, how they're -- you
17 know, when you come to discuss whether that
18 deduction should apply or not, you know, there's
19 discussions still to be had about what the correct
20 protocol is to whether you apply the penalty or
21 not. And so there's still lots of commercial-type
22 things that need to be bottomed out, and equally
23 technical issues that still need to be resolved.

24 So there was something else I wanted to
25 say there. Sorry, can we take a five-minute?

1 KATE McGRANN: We can take five
2 minutes, it's 11:20.

3 RICHARD FRANCE: Or shorter than that.

4 KATE McGRANN: Yeah, we can take a
5 two-minute break.

6 RICHARD FRANCE: Okay.

7 -- RECESS TAKEN AT 11:19 --

8 -- UPON RESUMING AT 11:21 --

9 KATE MC GRANN: Back on the record.

10 RICHARD FRANCE: Okay. So on the KPM
11 work orders, there's sort of three areas.

12 One is, you know, there's underlying
13 technical issues that still need to be resolved.
14 Some of those are from construction, some of those
15 have arised maybe after the warranty period; so
16 there's that sort of thing.

17 There's the commercial behaviour around
18 how to apply those KPM work orders that still
19 needs to be discussed and resolved and like that.

20 And the other side is just some
21 internal performance improvement type stuff around
22 how both RTM and Alstom handle those work orders,
23 like optimization type stuff.

24 So those are what I sort of consider
25 the areas where, you know, where we are with those

1 work orders.

2 KATE McGRANN: We know the City has not
3 been making maintenance payments to RTM.

4 Has that non-payment had any impact on
5 Alstom's ability to comply with its maintenance
6 obligations?

7 RICHARD FRANCE: Okay. So, you know,
8 despite the commercial issues around non-payment,
9 Alstom has -- that is not a barrier for Alstom to
10 continue to fulfill its obligations under the
11 contract. Irrespective of the commercial
12 situation, we're actively engaged to try to improve
13 the situation.

14 You can almost separate out the
15 operational side of Alstom that's trying to deliver
16 what we've got to do as part of maintenance, and
17 the commercial side.

18 So I work heavily on the commercial
19 side, and another individual historically has been
20 covering the operations side in greater detail.

21 So I wouldn't say the fact that they
22 have not paid us is -- or that we have not received
23 payment is something that's currently affecting
24 performance from a quality, safety or execution
25 type of perspective. That's not a blocker there.

1 But, but what I would say is that the
2 commercial issues that are amounting, probably for
3 RTM, and Alstom, and maybe OLRT-C, and then equally
4 the City is part of this topic, those commercial
5 issues are causing a big problem for everybody.

6 And, you know, senior people in Alstom
7 are very aware of the situation, and there's no way
8 that this is going to work for the full duration of
9 the contract in this kind of way. There has to be
10 something done to fix some of the commercial
11 problems around the whole thing.

12 So there's probably problems on all
13 sides, you know, I've talked enormously about, you
14 know, handling of CC defects under the warranty for
15 the infrastructure. I've talked lots about
16 roadblocks we've had around documentation.

17 And I haven't talked about facilities,
18 actually, but that's another factor that disrupts
19 us and then causes us problems that eventually
20 leads to commercial things and affects our revenue.

21 So there's going to need to be a big
22 discussion about how they fix this so that
23 everybody is able to work together in a very
24 collaborative and efficient way.

25 So I'm certain that in the next little

1 while, there will be lots of -- following this
2 public inquiry, there will be lots of legal battles
3 where people are dragging things out in court to
4 argue about historical stuff. But, you know, when
5 all that is done, some of the problems that we have
6 basically are -- we're still going to be faced with
7 those problems.

8 We have to actually resolve these
9 commercial issues, otherwise, yeah, it can't
10 possibly go on like this long-term.

11 KATE McGRANN: I'd like to speak to
12 some of the operational issues that were captured
13 after the line went into passenger revenue service.

14 The door faults that were encountered;
15 what kind of -- did that pose a challenge from the
16 maintenance perspective, and how did you go about
17 addressing this?

18 RICHARD FRANCE: Maintenance
19 perspective, less so. We're essentially two
20 projects on the same site. So there's the rolling
21 stock project with Alstom where the client is
22 OLRT-C, and then there's the maintenance one where
23 the client is RTM.

24 So that particular issue fell under
25 the, you know, for the rolling stock team to

1 address. But that was sort of normal in some
2 respects when you have a new rolling stock, or new
3 system, you find these little teething problems.

4 So it wasn't a major disruption to the
5 passengers. The technical problem arose, and then
6 we had to come up with a solution, and then you go
7 through the process of engineering it, getting
8 supply chain mobilized, and then, you know, then
9 you actually go about fixing it on-site.

10 So I wouldn't say that's a major thing.
11 It's just sort of, you know, issues that arise as
12 any part of new system, and that was one of them.

13 KATE McGRANN: And when you say it
14 wasn't a major thing; what perspective are you
15 saying that from?

16 RICHARD FRANCE: I mean, we were able
17 to continue to offer trains and service, you know,
18 safely. And then in parallel work through the
19 solution to that problem.

20 KATE McGRANN: With respect to the
21 cracked wheels that came up. Can you speak to the
22 impact that that issue had on service, and how it
23 was dealt with from a maintenance perspective?

24 RICHARD FRANCE: Yes. Cracked wheels
25 was more disruptive, certainly. So I think it was

1 in July 2020, is when we first discovered the
2 problem. And then, you know, you can clearly see
3 it in the stats, where the availability was much
4 lower as a result of that problem.

5 So we had to implement a daily
6 inspection of the wheels to check for cracks. When
7 I say "we", so I'm sort of talking, I mean, the
8 people that were implemented to do this were on the
9 rolling stock project.

10 Anyway, so there's this daily
11 inspection of these wheel cracks. And the train
12 reduction schedule at night -- so there's a
13 schedule from the City about times the trains go
14 into service, and the times that they come back.
15 So that reduction schedule had to be changed a
16 little bit. We needed trains earlier on, so that
17 we could actually get through the inspections of
18 the wheels before the next day's service.

19 So that was a challenge because too
20 many trains would come back say at 11:00 p.m.
21 or 1 in the morning, and there's no way you can
22 turn around that kind of inspection in that short
23 period of time.

24 So, yeah, that led to some changes in
25 the service availability.

1 KATE McGRANN: Any obstacles in
2 resolving that issue?

3 RICHARD FRANCE: In terms of
4 investigating that, it was pretty clear-cut, pretty
5 easy to understand what was wrong.

6 So I know TSB was involved, and they
7 produced their report and stuff like this, but
8 there was people supporting, in Alstom, from afar.
9 You know, we have a specialist centre for bogies in
10 France, Le Creusot, where there's engineers for
11 that, that were investigating and figuring things
12 out, the local team. It was a pretty easy one to
13 solve.

14 And then actually, the solution,
15 though, to fully remove the cracks from the fleet,
16 that's a bit more cumbersome, because the activity
17 requires, you know, removal of wheels and
18 replacement with ones that don't have cracks and
19 stuff like that, and so that can take time. And
20 you end up getting into a program that passes over
21 a much longer period to get there. But while all
22 this is going on, you have that daily mitigation of
23 the inspection of the wheels for cracks.

24 Eventually -- we haven't spoken about
25 the derailments or anything -- but following the

1 second derailment, they no longer allowed trains
2 with cracked wheels in service. So that's kind
3 of -- I don't think they needed to go to that
4 length, actually. That mitigation was perfectly
5 fine for detecting those cracks. So they could
6 have allowed for, you know, trains that were
7 mitigated to be used in service.

8 So again, that adds challenges in terms
9 of meeting the availability requirements and like
10 that. And there was a perfectly accepted
11 mitigation prior, so...

12 KATE McGRANN: With respect to the
13 wheel flats that presented on the system, do you
14 have a sense of what led to those, and how was that
15 addressed?

16 RICHARD FRANCE: So there was lots of
17 things. So I feel like it was 2020 again, probably
18 end of winter, early spring in 2020, there was lots
19 of trains ended up having wheel flats.

20 And, you know, lots of factors that
21 contribute to a problem like that. You know, you
22 have how your signalling system behaves with
23 applying the brakes, and how the -- within the
24 signalling system, there's -- it's sort of telling
25 the trains to achieve maximum traction, and then

1 when it needs to brake, it applies a maximum level
2 of braking. And there's different kind of profiles
3 you can have for the operations. So in sort of
4 cold, wet conditions, they were really pushing the
5 trains to the performance. But actually, you know,
6 there's different type of braking that can be
7 applied to reduce the occurrence of those flats.

8 So in the beginning, the City, I think
9 I would say, was a little stubborn and they were
10 really driving the trains to their maximum
11 performance under that signalling system. And then
12 later, they sort of realized, okay, we can actually
13 implement a reduced braking.

14 You have Type 1 and Type 2 braking, and
15 which have reduced levels of braking being applied.
16 So that helped to reduce the number of flats that
17 were occurring. So we didn't have that problem in
18 future years.

19 And to deal with the issue, they called
20 them "Tiger Teams" at the time, but there were lots
21 of people to investigate, so there was RTM was
22 involved. JBA Consultancy that the City had
23 brought in were involved somewhat in the
24 investigation with Alstom. And so we had these
25 like recurring meetings where we talked through

1 that problem. And there was sort of a report that
2 was created at the end that explained all the
3 different factors related to that.

4 But, really, the implementation of Type
5 1 braking in poorer weather conditions
6 significantly helped alleviate that problem. And
7 that's very much an operation piece, so...

8 And we come back to the part earlier
9 about how, you know, handling of stuff in revenue
10 service. I'd say there's a bit of a miss there
11 where Alstom has lots of experience to show how we
12 can better deal with faults in service, or how we
13 can better operate the train, so that it prolongs
14 the asset life and like this.

15 So that would fit in that category very
16 well. Like if we could work more closely with the
17 City to improve the operations, then aspects
18 related to maintenance would go much smoother and,
19 you know, we'd have a better system overall.

20 KATE McGRANN: The report with respect
21 to the wheel flats; who authored that report?

22 RICHARD FRANCE: Who authored the
23 report? So the exact name of the person that
24 authored it, I'm not 100 percent. I know Lowell
25 Goudge certainly reviewed it, and was part of that

1 Tiger Team.

2 The individual who actually authored it
3 was at JBA, his name is alluding me now. Actually,
4 I think he was an ex-Alstom employee at one stage,
5 many, many years ago. So I believe that the
6 individual at JBA wrote it, and then Lowell sort of
7 peer-reviewed it with him, like that.

8 KATE McGRANN: With respect to the
9 City's stubbornness to apply a different operation
10 or braking profile, do you know how long did that
11 stubbornness persist after the issue was brought to
12 their attention?

13 RICHARD FRANCE: Yeah, I don't.
14 Definitely in 2020, it was still there. By 2021 we
15 were applying the different braking in that sort of
16 season to address the issue, and the volume of
17 flats was certainly lower.

18 But it's hard to say exactly when.
19 But, you know, they sort of realized that it was
20 the better thing to do. Because from the City
21 perspective, they've got to offer trains every day.
22 If all your trains end up with flats, well then
23 tomorrow you won't have any trains. So it's in
24 everybody's interest to lighten the braking -- or
25 lightening the profile for braking a little bit.

1 KATE McGRANN: Are wheel flats still
2 occurring at a rate that would be beyond what you
3 would expect from normal use of the system?

4 RICHARD FRANCE: Now it's not
5 unreasonable. You get wheel flats on any rail
6 system, so you're going to experience some of that.

7 Like I said, it can be caused by lots
8 of different factors. So, you know, it's not a
9 problem that's crippling us at the moment.

10 KATE McGRANN: I think there were
11 issues with the roof inductors shorting out; does
12 that make sense to you?

13 RICHARD FRANCE: Yeah, line inductors
14 and line contactors, yeah.

15 KATE McGRANN: Was there a cause or
16 causes determined for those issues?

17 RICHARD FRANCE: Yeah. Again, so that
18 was largely picked up by the rolling stock project
19 that there was various modifications done to
20 address those issues, yeah. So, yeah,
21 modifications done on the line inductor, and then
22 line contactors as well.

23 So I can't really speak to exactly what
24 was done, because I wasn't really involved in that.
25 But they put a new cover on the roof of the

1 inductor to help, you know, air, humidity kind of
2 ventilate out of the box. And then there was
3 probably something done around the mounting of the
4 thing.

5 I can't speak to it perfectly, so
6 Lowell is definitely a better individual for that
7 discussion. But there were solutions implemented
8 for sure.

9 And again, like I said, normal teething
10 problems at the start of any new system.

11 KATE McGRANN: With respect to the
12 first derailment that happened on August 8th, 2019,
13 other than the mitigation plan that was put in
14 place, were any changes made to the maintenance
15 approach that Alstom took to the system after that
16 first derailment?

17 RICHARD FRANCE: Well, same idea to the
18 wheel cracks. When an issue like that arises, you
19 know, we would follow an 8D Problem-Solving
20 Methodology where, you know, you identify the
21 problem, evaluate the risk, decide what actions you
22 need to take to mitigate the issue. And then you
23 have other actions to figure out what the root
24 cause is, and then finally once you figure out what
25 the root cause is, you come up with a curative

1 solution that's permanent.

2 For that one, again, we had to
3 implement a mitigation which consisted of an
4 inspection of the axle hubs at every
5 7,500 kilometres.

6 So this was done with sort of like a
7 pry bar to evaluate the clearance between the wheel
8 and the axle hub.

9 So, I mean, not necessarily a change to
10 the maintenance plan, but that was an extra
11 activity that we had to do on a recurring basis.
12 And that mitigation will remain in place until
13 we've established what the root cause of that
14 problem is, and come up with a curative solution.

15 Or alternatively, if we gather
16 sufficient data to justify an alternative
17 mitigation that equally provides the same level of
18 safety then, you know, then we move to that. But
19 until that such time, we'll stick with that level
20 of inspection.

21 KATE McGRANN: Any changes to Alstom's
22 staffing levels or compliment made following that
23 derailment?

24 RICHARD FRANCE: Well, yes. So, I
25 mean, extra people had to be brought in to carry

1 out that inspection for sure. So, you know,
2 which -- I mean, it would probably be quite normal
3 for an activity like that where you need to change
4 your resourcing requirements accordingly.

5 KATE McGRANN: Other than bringing in
6 extra people to perform that new inspection
7 routine, any other changes made to the staffing
8 complement?

9 RICHARD FRANCE: For the first
10 derailment of LRV19, I think it mostly extra
11 technicians that were brought in to help with that
12 activity. Later for the second derailment, it was
13 a little different.

14 KATE McGRANN: And we will talk about
15 that one in a second.

16 Any changes made to the approach to
17 oversight either by Alstom, or by RTM, or the City
18 that you could see after the first derailment?

19 RICHARD FRANCE: You know, so the only
20 thing to bear in mind as well, is that Alstom
21 acquired Bombardier. So our footprint changed
22 considerably around the start of 2021. So we
23 suddenly went from 600 to maybe, you know, a few
24 thousand people.

25 So things were just kind of naturally

1 evolving in the organization anyway. Suddenly we
2 had a lot more other projects in the area where we
3 could draw on resources. And there was other
4 senior people that had some skill and backgrounds
5 and stuff like this, in addition, just in
6 comparison to what we had.

7 So I wouldn't say following the
8 derailment of LRV19, the first derailment, I
9 wouldn't say that there was sort of specific
10 changes to the actual organization in Ottawa in a
11 significant way. But, then the level of people
12 involved in the project was kind of quite
13 different, just because we were also going through
14 a huge organizational change.

15 So, you know, like the head of quality
16 was regularly on-site. There was a lot of, you
17 know, senior management that were involved in lots
18 of different projects. And, you know, other people
19 that were flying over from UK or other areas to
20 support.

21 So we were -- it's not like we locally
22 changed our actual organization. It's just that
23 because of that, I think there was a lot more
24 visibility and support through the organizational
25 change.

1 KATE McGRANN: And has that increased
2 visibility and support continued? Like does it
3 continue to this day, or did it die down after the
4 Bombardier transaction closed?

5 RICHARD FRANCE: No. I mean, if
6 anything with the acquisition of Bombardier,
7 there's a lot more resource available to focus on
8 Ottawa. So it's quite a positive thing, I think,
9 for the system here in Ottawa, now that the
10 organization is larger.

11 It's not to say that we didn't have
12 what we needed before. It's just that, you know,
13 naturally you're going to notice the difference
14 when you multiply your organization by a factor of
15 somewhere between five and ten.

16 So, no, Ottawa is a very well-known
17 project in Alstom in Ontario, and Canada, and North
18 America. And it's very well known in Paris, as
19 well. Senior people in Paris that are very keen
20 and interested to know what happens in Ottawa and
21 getting quite a lot of attention, so yeah.

22 As I said earlier, Alstom is a good
23 company in many respects. They're going to look
24 after its product, the best it can. So we don't --
25 we don't leave it behind. We do whatever it takes

1 to make sure it's working well.

2 KATE McGRANN: Can you speak to the
3 level of cooperation between the different
4 stakeholders in responding to derailment one?

5 RICHARD FRANCE: Cooperation between
6 stakeholders. Well, obviously, we had to give the
7 information to RTM. But actually, I feel like they
8 more -- so they had to do the piece where they
9 interfaced with the City, and we had to feed
10 information to them, and obviously give them
11 regular updates.

12 But I wouldn't -- it's funny, because
13 prior to that, I seem to recall they sort of said,
14 "no, look, we want to deal with TSB and the City.
15 And we don't want Alstom to handle everything."

16 Then the derailment happened and
17 they're like, "okay, over to you, Alstom. Do what
18 you've got to do to sort it out."

19 So I don't -- I mean, was RTM value
20 add? I don't know. I don't -- they're just sort
21 of the entity in between us and the City.

22 So cooperations, I mean, there was
23 things like, we needed extra -- you take for
24 example, the facilities are managed by RTM. So we
25 needed help with them on some of their facilities.

1 Because we've been inundated with performance
2 problems related to the facilities which they're
3 looking after.

4 So to deal with, you know, to deal with
5 trains that did not pass the criteria from this
6 check that we implemented, you know, we'd have to
7 go in and lift trains up in the air on lifting
8 jacks, and then remove bogies, and then exchange
9 parts and stuff like that. But we're limited with
10 the facilities, so there was only one really set of
11 lifting jacks. But you need the lifting jacks to
12 do the inspection, and also to replace parts when
13 they failed that inspection. So you can't do the
14 two in the same space, so we needed a second set of
15 lifting jacks.

16 So RTM, with OLRT-C, they're working to
17 get a second set of jacks. And they had been
18 working to get this set of jacks working for months
19 and months, and they hadn't managed to achieve
20 that.

21 But we had another site in Kingston, I
22 believe it was, that had lifting jacks. And within
23 three days, we got them shipped over from Kingston
24 and set up, ready to lift trains and help with the
25 mitigation and stuff, so that we could try to

1 achieve the service requirements.

2 So I wouldn't be satisfied with the
3 level of support from RTM, as far as that instant.
4 Or, really, in other issues like many capacities
5 over the last couple of years when they've been
6 trying to get in service.

7 KATE McGRANN: Can you speak to
8 derailment two, and what Alstom knows about the
9 cause of that derailment?

10 RICHARD FRANCE: So the second
11 derailment was really an offshoot of the first, in
12 the sense that we were replacing an axle hub from
13 LRV21 that had failed this pry bar inspection
14 criteria that we had set for ourselves, so it
15 failed.

16 So we were replacing that axle hub, and
17 as part of that activity, there was some mistakes
18 made around the tightening of the bolts. So,
19 essentially, there was a change in shifts between
20 one crew of people and another, and the status of
21 the tightening of those bolts wasn't communicated
22 well, and then so that was missed. And essentially
23 that led to the parts coming loose in service and
24 the derailment of 21.

25 So that's, yeah, so it's sort of a

1 human error type of issue. People immediately when
2 you say "human error", they point the figure at the
3 human. But there's lots of factors that you have
4 to consider for what had contributed to that type
5 of issue.

6 So, yeah, so it was a human factors
7 type of thing.

8 KATE McGRANN: And what factors do you
9 think need to be considered in terms of the second
10 derailment?

11 RICHARD FRANCE: So as far as the
12 return to service, actually, we outlined -- I
13 worked jointly with James Messel at RTM to visage
14 that return to service document.

15 And in that, it outlines quite well the
16 sort of things that were identified to change, to
17 address the shortcomings there.

18 So there's quite a lot of stuff there,
19 actually. So again, like I say, human factors
20 there's lots of things that need to be considered,
21 so you can really look everywhere.

22 So we, again, we brought in extra
23 resource. This time, you know, there is extra
24 people providing a sort of quality assurance type
25 role. So like really peer checking every little

1 thing that was being done by the technicians
2 carrying out the work.

3 And then, yeah, we made some
4 enhancements to the organization for short term.
5 And by "short term" I mean, you know, next couple
6 of years where we'll have some extra senior people
7 to provide additional support and oversight. And
8 as I said earlier, we're always evolving the
9 organization and adapting as-needed.

10 You know, we're obviously very
11 motivated to make sure we have what we need to
12 achieve the service requirements, because that's a
13 significant driver for our revenue. It's a very
14 key driver. So if we don't have it right, then we
15 will have service disruptions, and we won't get any
16 money.

17 So we're motivated to put what we need
18 in place and create the efficiencies and
19 optimizations.

20 KATE McGRANN: In terms of how LRV1121
21 entered back into service, it's my understanding
22 that there was another work order for a different
23 train was used as part of the final work done on
24 that vehicle; have I got that right?

25 RICHARD FRANCE: I'm not sure what you

1 mean, actually.

2 KATE McGRANN: So I'm referring to a
3 rail safety letter from the TSB, that talks about
4 staff scanning values off a work order in order to
5 record the work that was done on that particular
6 train.

7 And there's a suggestion here that a
8 different work order was used in order to finalize
9 the information input about the work done on
10 LRV1121; have I got that right?

11 RICHARD FRANCE: I'm not entirely
12 100 percent sure, but I'll talk around what I
13 believe you're leading to.

14 So again, the team that was doing the
15 replacement of these axles, that was under the sort
16 of the rolling stock organization. It's still, I
17 mean, it's Alstom. But they have -- you know,
18 Alstom is divided into different profit centres,
19 and different organizational structures.

20 And so you have the services piece,
21 which covers maintenance. And then you have new
22 build, rolling stock, which covers, you know, sort
23 of the other side.

24 So the goals are sort of different, and
25 so there was different people that were working on

1 that activity. So things are not necessarily done
2 exactly the same way in one organization or
3 another. You have, you know, like they would use
4 microprocesses instead of WMS's, and WMS is like a
5 "Work Method Statement". So the information
6 explaining what you've got to do is laid out in a
7 different way.

8 And then they were working on a
9 different system for recording their activities.
10 And on maintenance we use SAP, which feeds directly
11 into IMIRS. So you sort of have this disconnect
12 where there's two different ways of working.

13 So, actually, there's probably, you
14 know, there's probably a gap there. Because if I
15 want to be really stubborn, I would say that,
16 well, all the work that was under that rolling
17 stock entity, should be overarching, you know,
18 there should be OLRT-C over top of it, looking at
19 what's going on. And then somehow they communicate
20 that back to RTM to say, we've done our piece of
21 work. And that train is handed back over to you,
22 as the maintainer, and then they'd probably say to
23 Alstom as the maintainer, look, you now need to
24 carry out, whatever you need to do to make sure
25 that train is serviceable; stuff like this.

1 So if you want to be really stubborn
2 about the organizational structure that should be
3 controlling these things, you'd say that there's
4 sort of two separate entities, and it feeds up to
5 OLRT-C, and the other one doesn't.

6 But, you know, people just go, "well
7 Alstom is dealing with both. So, well you guys
8 just sort out this stuff together".

9 So which we kind of do, you know, it's
10 all from an operational point of view, everybody is
11 working really closely together with Alstom, it
12 doesn't matter if it's one contractor or another in
13 that sense.

14 But it does mean that there's two
15 different ways of working, and then how they're
16 handling things on the construction contractor side
17 is not necessarily aligned with what is in the
18 Project Agreement about how the information is to
19 flow in IMIRS.

20 So I think that's probably a piece that
21 was not thought well enough through when they were
22 coming up with a structure of the different
23 stakeholders and stuff.

24 Because at a contractual level, it's
25 kind of wrong to say that, "well, Alstom, you're

1 involved in both contracts. So just sort it out."
2 But, you know, we have different clients.

3 I mean, it doesn't really excuse what
4 happened in the sense of the outcomes, I'm just
5 sort of highlighting that as a piece that wasn't
6 given enough consideration.

7 So when you say "work order was being
8 filled out", likely what we did was, we had a work
9 order to track that that activity was done, in our
10 system. And then separately, those retrofit staff
11 that were doing that work would have their own
12 paperwork that they'd fill out, and then they would
13 indicate, "okay, we've done that". And someone on
14 the maintenance team would've closed that work
15 order, and it would have been done for traceability
16 in the system. So that's probably what that's
17 alluding to. So they would have their separate set
18 of paperwork and it's not really the same.

19 KATE McGRANN: With respect to staffing
20 changes that were made in response to derailment
21 two, you mentioned that a quality assurance role
22 has been -- there's quality assurance personnel
23 that were not there before; is that right?

24 RICHARD FRANCE: So we've added in the
25 sort of quality inspectors that sort of peer check

1 a lot of the -- well, all the work that they were
2 doing -- that they're doing since that derailment.
3 So, yes, that's an addition that wasn't there
4 before.

5 It wouldn't be normal, actually. That
6 wouldn't be normal to have that level of quality
7 assurance in a maintenance organization typically.
8 In Alstom, we'd normally have a one or two quality
9 personnel in the maintenance project that actually
10 look after that function, and then a greater level
11 of quality is built into the technicians and the
12 operations and, you know, through the structures,
13 the paperwork and peer checks that you defined in
14 your maintenance instruction.

15 So those extra personnel providing that
16 quality assurance, that's a temporary thing. And
17 eventually we'll scale back on that, when they're
18 no longer needed. But, yeah, so it's a temporary
19 thing to really bolster the extra checking and
20 upscaling the technicians and like that. So, yeah,
21 so some additions were made there.

22 There was another strong individual in
23 the quality area to come in as a head of quality,
24 in addition. Sort of like as a senior management
25 personnel.

1 KATE McGRANN: And is the intention for
2 that person to stay long-term?

3 RICHARD FRANCE: No. I mean, it's not
4 forecasted to stay -- it will be, like when I say
5 maybe we don't have the same agreement with what
6 "long-term" is. It's a few years anyway.

7 And then it will continue to roll on,
8 if it's still needed. And if it's no longer
9 needed, because there's the right level of quality
10 built into the rest of the organization that it can
11 scale back. We'll always have sort of a quality
12 manager as part of the management team. But this
13 more senior role will eventually move on.

14 KATE McGRANN: Any more staffing
15 changes made in response to the second derailment?

16 RICHARD FRANCE: Yeah, so a few things.
17 We brought in -- so we're in the process of
18 reorganizing sort of operations support a little
19 bit so there's a role that will be filled to try to
20 pull engineering and sourcing and supply chain and
21 performance and stuff together a bit better to
22 support operations. But I don't know if that's
23 necessarily directly related to the derailment.
24 That's kind of more in line with Alstom as a model
25 for maintenance organizations, and that would be in

1 line with that, just an improvement.

2 So I said the head of quality, I mean
3 we brought in, there's a new GM. So general
4 manager who's come over from the UK who has prior
5 experience working on London Overground. So it's
6 the same as London Underground, if you're not
7 familiar. So he's come over to lead the
8 organization that way.

9 What else? And so I mentioned extra
10 technicians, so I think I've got it.

11 KATE McGRANN: What specifically is
12 being done to address the use of different
13 approaches to the maintenance, or to the work being
14 done on the vehicles that you described?

15 Operations taking one approach, and the
16 maintenance team taking a different approach?

17 RICHARD FRANCE: So, yeah, we're
18 looking to move towards the same system. Because
19 we -- it's a bit complicated for this discussion,
20 but there's, you know, there's two different
21 maintenance plants set up and then, you know, we
22 call it "SES" and "MES".

23 So we're looking to move everybody into
24 the same system, so that all the work orders are
25 tracked up into IMIRS and everybody is working in

1 the same kind of way. So that's a piece that's
2 kind of hard to explain without really going into a
3 long IT technical kind of discussion. But we're
4 looking to merge those together a bit better.

5 You know, and operationally speaking,
6 though, everybody meets regularly to talk through
7 the work that has to be done. It's not like these
8 two different organizations are not talking to each
9 other or working off the middle of nowhere. At an
10 operational level, they're interfacing with each
11 other very regularly, you know.

12 KATE McGRANN: I understand there were
13 derailments in the maintenance and storage
14 facility. Are you in a position to speak to those?

15 RICHARD FRANCE: Derailments in the
16 maintenance and storage facilities, sure, yeah.

17 Is there a particular one?

18 KATE McGRANN: I believe there were
19 two, have I got that right?

20 RICHARD FRANCE: Probably more,
21 actually, if you go back far enough so...

22 KATE McGRANN: Since entering passenger
23 service.

24 RICHARD FRANCE: Yeah, so we had --
25 it's going to be hard to remember. We had -- yeah,

1 so we had one near the connector tunnel, it was not
2 really -- so there were various factors, but there
3 was lubrication issues around the yard.

4 So there's no rail lubricators in the
5 yard to grease the tracks. The trains have a
6 flange lubrication system, so it squirts a bit of
7 oil or grease onto the wheels, and then that, you
8 know, provides lubrication to the rail. So that
9 wasn't working in the yard because, you know, it's
10 prompted by the signalling system.

11 So there was one -- I'll say one or two
12 derailments, actually, with LRV16 where, you know,
13 the wheels climbed up the rail and led to a
14 derailment. So since then, we've done a software
15 mod to the trains to apply lubrication to the rail.

16 And prior to that, we actually went and
17 started manually greasing the rails regularly
18 again, probably every couple of days to ensure
19 there was appropriate lubrication there. So those
20 sort of things. I think there's probably a miss in
21 the sense that you'd expect at the OLRT-C's level,
22 you'd expect there would be some discussion about
23 what the signalling system is going to give you
24 versus the trains, and how the tracks are set up,
25 whether there's manual greasing required or not.

1 So there's probably a miss there in terms of
2 organizing the different interfaces.

3 So LRV16, we had a different -- I can't
4 remember the train now. We had a different train
5 that derailed, because YCC threw the switch as the
6 train was on top of it, so that we drove over a
7 switch that was in the wrong position. So that was
8 kind of like an operator error type of derailment
9 that happened.

10 But, you know, these things do occur
11 and you do get derailments in yards, probably more
12 frequent in the yard than on the main line. We
13 used to have them in the Stratford depot on the
14 Jubilee Line. And then equally in Dublin we had
15 derailments in the yard. So that's a --

16 KATE McGRANN: Sorry, I didn't mean to
17 cut you off.

18 RICHARD FRANCE: No, go ahead.

19 KATE McGRANN: Any derailments since
20 the fix was implemented for the lubrication issue
21 in the yard?

22 RICHARD FRANCE: I don't think so. Not
23 related to that anyway.

24 KATE McGRANN: Are you recalling
25 something that was related to something else?

1 RICHARD FRANCE: I'm just having a hard
2 time remembering. That derailment happened maybe
3 -- I feel like it was almost a year ago. But, you
4 know, in my role, I'm actually less -- I'm much
5 more commercial and less focused on the operation
6 side of things. So if I can't remember whether
7 there was a derailment since, that's probably why.

8 KATE McGRANN: Who's focused on the
9 operation side of things?

10 RICHARD FRANCE: Alexander L'Homme was
11 the operations director at one stage. And then
12 now, very considerably that's shifting towards
13 Peter Keighron, who is the new GM I mentioned
14 that's come over. So Peter is -- well, Alex is
15 phasing out and Peter is phasing in.

16 KATE McGRANN: The YCC, which you've
17 mentioned a couple of times, and I haven't followed
18 up on. What is that?

19 RICHARD FRANCE: YCC is the "Yard
20 Control Centre". So that's effectively where the
21 help desk is from RTM, and they also control the
22 moves of the trains through yards. They've got to
23 like, you know, put the switches in the right
24 positions and like that.

25 So they control that piece. So there's

1 kind of an interaction between them and Alstom,
2 because we have a hostlers that move the trains
3 around. Because the signalling system is not
4 really commissioned for the yard, there's a
5 variation that we have to provide train drivers
6 that shunt the trains around where we need them.
7 And they have to communicate regularly with the
8 yard control centre to execute those moves.

9 That again is another disruption that
10 causes us problems. Because in theory, if the yard
11 was set up so that the moves can be done in an
12 automated fashion with the signalling system, you'd
13 think there would be some efficiencies there that
14 we can take advantage of.

15 Then there's been problems with
16 communication between hostlers and YCC. They talk
17 over a radio system, and that creates incidents and
18 stuff like this that have the potential to be, you
19 know, of considerable concern from the safety point
20 of view, because there's technical people dealing
21 with those moves.

22 So RTM takes those issues -- well, RTM
23 and Alstom are taking those issues very seriously
24 in trying to improve the moves that happen in the
25 yard. So again, like I said, around human factors,

1 there's lots of little things that can contribute
2 to incidents happening.

3 But when the CBTC system is set up, it
4 should help in many ways to reduce the level of
5 human error, I would hope, we'll see when it's up
6 and running.

7 KATE McGRANN: What's the communication
8 radio issue? And if I'm conflating two things, let
9 me know, but what's the concern there?

10 RICHARD FRANCE: How you communicate,
11 you know, there's -- when people get trained to use
12 the radio, there's sort of a set protocol in terms
13 of how you're meant to speak, and what you're
14 supposed to say; and so stuff like that.

15 If things aren't communicated well,
16 then it can lead to misunderstanding of stuff, so
17 that could be one factor.

18 And then, you know, someone equally in
19 YCC could make a mistake over where the train is
20 actually positioned, and they're trying to execute
21 a move from A to B, and they've made a mistake,
22 like that. There's lots of things, but just one of
23 the interfaces that we have to work with.

24 I said it earlier, it's a shame that
25 Alstom is not in control of the yard control centre

1 because we can have a -- it would probably help to
2 optimize that activity a bit more.

3 KATE McGRANN: Why do you think that
4 is? One less interface between two different
5 organizations, or what is it?

6 RICHARD FRANCE: So, for example, if
7 we're trying to launch trains for service in the
8 morning, and at the same time, though, we're also
9 trying to position trains so they're ready for
10 maintenance.

11 So YCC, who is an RTM entity, is really
12 focused about getting the trains into service. So
13 they're nervous about trying to do two things at
14 once. So that means that priority is going to
15 getting the trains into service, rather than making
16 sure the trains are also positioned for where they
17 need to be for maintenance after launch.

18 So where it should be possible to carry
19 out, you know, multiple moves at the same time, and
20 then you have this, you know, things are ready.

21 Because it's sort of the maintenance is our
22 activity, I feel like it's left more -- we're left
23 more to support after the launch and services
24 secured.

25 KATE McGRANN: The Commission has been

1 asked to look into the commercial and technical
2 circumstances that led to the breakdowns and
3 derailments on Stage 1.

4 Are there any areas or topics that we
5 haven't talked about this morning that you think
6 the Commission should be looking at in pursuit of
7 that mandate?

8 RICHARD FRANCE: We didn't discuss very
9 much about facilities, I think, in the maintenance
10 facilities.

11 So things like the wheel lathe, and the
12 lifting jacks, and the cranes, and paint booth, and
13 railcar movers that help to move trains around, so
14 all these things are sort of critical pieces of
15 equipment that also needs to execute the
16 maintenance. But those facilities are maintained
17 and essentially sort of under control of RTM. So
18 if they breakdown, we have to get RTM to fix those
19 things and like that.

20 So I'd say it's a shame equally that
21 Alstom is not maintaining those facilities, because
22 then we'd have greater control of our destiny,
23 let's say. We would like to think that if
24 something broke down, we would be more proactive to
25 try and fix it, because it's critical to us. But

1 instead, this situation is, we have to report it to
2 RTM and maybe they're not as keen as we would be to
3 rectify it.

4 They have asked us to sort of price up
5 a variation to take control of those facilities.
6 But I don't know that there's any seriousness to
7 their request, because they haven't formalized
8 their request in a letter or anything. And if they
9 really wanted to know what the price was, I'm
10 pretty sure that we submitted some details as part
11 of the tender that outlined what our price would be
12 if we controlled the YCC, and the facilities, and
13 then what it would be if we didn't.

14 So, you know, by them asking for our
15 price is just a way to buy more time and create a
16 bit of noise around the topic. But those
17 facilities cause us a big headache.

18 KATE McGRANN: The facilities and
19 delays in getting you what you need, I could see
20 how that would contribute to longer times than
21 necessary to repair things.

22 In your view, could that also be a
23 contributing factor to what caused the derailments
24 or breakdowns in the first place?

25 RICHARD FRANCE: I mean indirectly,

1 yes. So things like the facilities -- and it's
2 tricky, because it's one of those topics where you
3 think, "well, it's caused me some disruption. I
4 would like to make a claim for that disruption and
5 pursue it that way to recover".

6 But because it's sort of indirectly
7 linked to a lot of things, it's really hard to
8 quantify the impact. So I wouldn't say it's
9 directly a factor that led to the derailments, but
10 it's a problem in the background that's made us
11 less efficient and causes a lot of stress for the
12 operations team that's executing the maintenance
13 and also executing these retrofits and stuff like
14 that.

15 And, unfortunately, those individuals
16 have been under a lot of stress over the last
17 couple of years with the system and, you know, the
18 facilities is one of those. It seems like it's one
19 of those simple topics that shouldn't be so
20 difficult if the right kind of supplier and
21 agreements were in place with the key entities, you
22 know, where you had a contract in place that says,
23 "okay, if it breaks down, you'll be here in such a
24 period of time".

25 You know, if that was better managed,

1 then it would be one of the things that would
2 reduce the level of stress of the operations team.
3 So, yeah, indirectly, yes.

4 KATE McGRANN: And other than
5 facilities, any other areas that we haven't
6 discussed today that you think the Commission
7 should be concerned?

8 RICHARD FRANCE: And again, there's
9 probably tons we could talk about on just the
10 contract structure. But less so in terms of how
11 that impacts the operation, you know, for people
12 executing the maintenance.

13 But the contract structure is -- you
14 know, I feel like RTM are not motivated as
15 significantly as Alstom would be to improve
16 performance. Because when you look at the payment --
17 so, yes, they would receive failure points for
18 these problems. And those failure points could
19 eventually lead to their termination, and equally
20 Alstom's termination by virtue of us being a
21 subcontractor.

22 But when it comes to the financial
23 impact, I mean, for the stuff that's Alstom's
24 scope, they really flow down 100 percent of any
25 penalties to us.

1 So they're not -- they're considerably
2 less motivated by the financial side, because they
3 can sit back and realize that now eventually when
4 all this is settled, we'll pass all the monetary
5 stuff down to Alstom.

6 Like, maybe I don't know if it's too
7 much information. But, you know, following the
8 derailments, we agreed a term sheet to, you know,
9 "without prejudice" agree a mechanism for getting
10 payment to the different entities.

11 So the City initiated this with RTM,
12 and then they had their term sheet with RTG, RTM,
13 and then a term sheet on to Alstom eventually. But
14 it's apparent from that term sheet, that actually
15 even though these derailments happened, you know,
16 RTM would still retain 100 percent of its money,
17 because they just flow it all down to Alstom.

18 And I said earlier it's without
19 prejudice, because certainly there will be more to
20 discuss about that with RTM later. But, yeah, so
21 it's part of the commercial mess that I was
22 alluding to before. The structure of the contracts
23 is really not good.

24 And, you know, again, the City -- I
25 don't have a direct link to the City, but

1 nonethless, I do exchange with them sometimes when
2 I see them in the hallway and whatever, you know.
3 And the City has this attitude that, well, I don't
4 care about how the different entities are made up.
5 I have a contract with RTG. And so, you know,
6 that's all I really care about.

7 But, you know, I'm a citizen of Ottawa,
8 I pay a lot of taxes. I think the overarching
9 entity actually should care. They should really
10 understand how the contractual structure is made
11 up. And then if you don't have a mechanism of
12 directly communicating with the entity that covers
13 70 percent, or around there, of the scope, then,
14 you know, why have you allowed that?

15 Your maintainer should not be allowed
16 to subcontract such a large portion without having
17 the communication link to that entity. I mean,
18 you're just asking for failure, I think.

19 So the fact that the City either
20 doesn't have visibility, or maybe doesn't care
21 about the inner workings of the, essentially, the
22 system that they bought, that doesn't seem right.

23 KATE McGRANN: Any other areas?

24 RICHARD FRANCE: Yeah, it's probably
25 okay. I think I could probably go on for a long

1 time about various things but...

2 Yeah, I mean, we were talking about the
3 derailment of LRV21, you know, we've stopped
4 service for such a long time, actually. And, you
5 know, when the derailment of LRV19 happened, the
6 first derailment, we stopped service for a few
7 days. And that's not really a lot, actually.

8 And the second derailment clearly --
9 the second derailment happened, and clearly I think
10 there was a lot of nervousness from people around
11 the system. But it was a very long time for the
12 system to be shut down, and it's, you know, as part
13 of that derailment, there was a lot of damage to
14 the infrastructure. And it took a considerable
15 amount of time to fix which, you know, the -- it
16 seems like there's some level of miss there as in,
17 maybe if it had been earlier, detected a little bit
18 earlier, we could have helped to reduce the level
19 of damage. So I don't know, I mean, it's just a
20 statement. There's nothing that we can do
21 differently now. But it's a shame.

22 So it probably comes back to what I was
23 talking about, how if we can work more closely with
24 the City to handle events and provide, you know,
25 build the operating book on that, how you deal with

1 issues in service, that maybe hopefully we could
2 have reduced the level of damage that was caused to
3 the infrastructure, and then been able to recover
4 from, from service -- recover back to service more
5 quickly.

6 Because we had a bit of an opportunity
7 with the fact that there was so much damage to the
8 infrastructure, that we could actually do a lot of
9 work in that downtime to the train, so that was
10 kind of -- we made really good use of that
11 opportunity to catch up on a lot of different
12 things, which gave us sort of a clean slate going
13 back into service.

14 So that was good to make use of the
15 time. I guess it was unfortunate that service was
16 stopped for such a long period of time. In my
17 experience, I've never actually worked on a fleet
18 where we've had such a long period where the trains
19 were out of service.

20 KATE McGRANN: Any other areas you
21 think the Commission should be looking at?

22 RICHARD FRANCE: That's okay, I think.

23 KATE McGRANN: The Commissioner has
24 been asked to make recommendations to try to avoid
25 these issues happening in the future.

1 Are there any specific recommendations
2 or areas that you would suggest he consider in that
3 work?

4 RICHARD FRANCE: Well, lots of things.
5 I definitely touched on them in the testimony. So
6 anybody who's going through it, can pick them out.
7 But there are a lot of things, actually. So we
8 would really be going over everything I've said
9 already.

10 KATE McGRANN: Anything that you
11 haven't already mentioned?

12 RICHARD FRANCE: No, no, it's okay.

13 KATE McGRANN: I appreciate your
14 patience. We've gone over the time we had
15 scheduled.

16 I'll turn to your counsel to ask if
17 there are any follow-up questions they wanted to
18 ask you.

19 MICHAEL VALO: None from us. Thanks.

20

21 -- Concluded at 12:20 p.m.

22

23

24

25

1 REPORTER'S CERTIFICATE

2
3 I, JUDITH M. CAPUTO, RPR, CSR, CRR,
4 Certified Shorthand Reporter, certify;

5 That the foregoing proceedings were
6 taken before me at the time and place therein set
7 forth; at which time the interviewee was put under
8 oath by me;

9 That the statements of the presenters
10 and all comments made at the time of the meeting
11 were recorded stenographically by me;

12 That the foregoing is a Certified
13 Transcript of my shorthand notes so taken.

14
15 Dated this 28th day of April, 2022.

16 
17 _____

18 NEESONS, A VERITEXT COMPANY

19 PER: JUDITH M. CAPUTO, RPR, CSR, CRR
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