

September 8, 2025

Via Electronic Mail

Philip Eng
General Manager and Chief Executive Officer
Massachusetts Bay Transportation Authority
10 Park Plaza
Boston, MA 02116
peng@mbta.com

Re: MBTA's Recent Initiatives for Fare Collection

Dear General Manager Eng:

This fall marks the implementation of two long overdue MBTA milestones. Today, the MBTA begins verifying riders' fares and issuing formal warnings and citations across the subway system. The MBTA has also confirmed the construction of new fare gates at South Station, which will go live before the end of the year. As I have shared with you, it is not only vital that the MBTA prioritize fare collection, but fare collection is part of the MBTA's fiduciary obligation to its funders and the public whom it serves. I firmly believe the MBTA has an obligation to collect fares and treat every public dollar as you would treat \$1 million. These efforts recognize that obligation. I commend the MBTA for embarking on these two critical projects to ensure revenue collection mirrors MBTA ridership.

As I stated in my March 4, 2025 [letter](#) regarding the importance of fare collection on the commuter rail system, I believe the MBTA has greatly understated the scale of uncollected fares and the resulting lost revenue over the years. Further, the MBTA incorrectly focuses disproportionately on fare evasion, when it must also focus on actively collecting fares on both the commuter rail and the subway system every day. I am also troubled by the poor fare collection efforts along the street-level Green Line and Mattapan Line stations.

Across the subway system, 65 of the 78 stations along the Green Line and Mattapan Line do not have fare gates, all of which are street-level stations. Most of these ungated stations are located along the four main Green Line street-level branches – the B, C, D, and E lines. I urge the MBTA to prioritize positioning the fare engagement representatives at street-level stations as it begins this next phase of fare checks, an area identified by the MBTA as one of the most problematic for fare evasion.¹ And, I would characterize it as an area where fare collection efforts fall short.

¹ The MBTA has programs for reduced fares for such users and students and the Legislature regularly considers proposals to address economic inequities. These programs are the way to address reduced and no-fare efforts, not by the failure to collect fares in the first place.

With the launch of the Automated Fare Collection (AFC) 2.0 program in August 2024, paying fares has become more convenient for riders, specifically at street-level stations. However, the impact on fare collection since its implementation has yet to be determined. As part of our Office's ongoing fare collection observations at various Green Line stations during peak commuting hours, my team notes that the vast majority of commuters entering via the train's back doors at street-level stations do not tap to pay fares on the new AFC 2.0 readers. Specifically, during weekday morning commuting, we observed between 79% and 100% of riders not paying fares when entering through a back door while riding the C and D branches of the Green Line.² Even with the introduction of the AFC 2.0 readers at back doors, significant numbers of riders continue to board for free as they did before August 2024.

The MBTA's Board of Directors began considering fare enforcement many years ago, and in 2022 finally adopted new fare collection policies (703 CMR 5.0). Nonetheless, since 2022, the MBTA has issued no warnings or non-criminal citations.³ In October 2024, the MBTA hired its first fare engagement representatives. The MBTA's Fare Engagement Unit currently has a staff of 19 and their collective salaries total around \$2 million.⁴

1. 16 Fare Engagement Representatives - \$100,755 annually
2. 1 Fare Engagement Supervisor - \$122,883 annually
3. 1 Fare Engagement Superintendent - \$138,208 annually
4. 1 Fare Engagement Director - \$159,135 annually

Considering the significant financial investment in the MBTA's transit system and subsequently its fare enforcement program, as well as the time and effort to codify the fare evasion policies and to educate the public, I urge the MBTA to fully commit to holding riders accountable by issuing warnings and citations for not paying fares. Fare is fair. The Office of the Inspector General (OIG) will monitor the issuance of citations and the collection of such fines as this fare enforcement effort takes root. Certainly, we are optimistic that the program will be successful and revenue collection will increase appropriately.

As important as investment in enforcement is at the MBTA, the agency needs to prioritize fare collection from all riders.

Completion of the fare gates installation should infuse much-needed commuter rail revenue into the MBTA's system. As I have previously stated, the lack of fare gate infrastructure in the heart of Boston at South Station and Back Bay Station, as well as in the existing outlying stations, has impacted the amount of commuter rail fare revenue collected, along with the MBTA's failure

² The OIG acknowledges that some commuters observed may be [Monthly LinkPass](#) or [Perq](#) program holders. However, the MBTA has acknowledged the significant decline in monthly pass holders since 2020.

³ The new policy requires the MBTA to publish an annual report on data relative to warnings and non-criminal citations for the previous 12 months. Since the adoption of these policies, the MBTA's 2023 and 2024 annual reports indicate that the Authority has issued no written warnings or citations.

⁴ This total does not include "loaded costs" that the MBTA also pays, including pension, health insurance, and other employee benefits.

to hold its commuter rail operator to the contractual terms for fare collection. Initiating this construction highlights the MBTA's priority to invest in fare collection and the importance leadership places on that vital revenue.

In conclusion, I stress the importance of the MBTA prioritizing fare collection at the street-level stations where fare collection is the weakest. Although the presence of engagement officers and the installation of gates at South Station show progress, the MBTA must fulfill its commitment to the riding public by showing that it takes fare collection seriously. My hope is that the fare engagement unit's presence, along with issuing warnings and citations and fare collection through gates on the commuter rail, will be the necessary sea change for the MBTA's leadership in prioritizing the collection of fares as part of its core responsibilities. I also hope that this change will help modify behavior of that subset of the traveling public who do not properly and regularly pay the fare when utilizing the MBTA transit system.

I am hopeful that when the MBTA leadership next seeks additional public financing it will have revenue data that will demonstrate its fiduciary obligation to collect revenue by its riders along all its modes and routes. While fare revenue will not erase the MBTA's need for other state funding, it may reduce the amount needed and also provide a greater level of assurance to how the MBTA treats such public funds.

Sincerely,



Jeffrey S. Shapiro, Esq., CIG
Inspector General

cc (by email):

Monica Tibbits-Nutt, Secretary and Chief Executive Officer, MassDOT
Thomas M. McGee, Chair, MBTA Board of Directors
The Hon. Thomas Koch, Mayor of Quincy, Vice Chair, MBTA Board of Directors
Robert Butler, MBTA Board of Directors
Eric L. Goodwine, MBTA Board of Directors
Sheriff Peter J. Koutoujian, MBTA Board of Directors
The Hon. Charlie Sisitsky, Mayor of Framingham, MBTA Board of Directors
Mary Skelton Roberts, MBTA Board of Directors
Chanda Smart, MBTA Board of Directors
Brian Kane, Executive Director, MBTA Advisory Board
Susanne M. O'Neil, Deputy Inspector General, OIG
Eugenia M. Carris, General Counsel, OIG
Emily Pedersen, Director, Internal Special Audit Unit, OIG
Nataliya Urciuoli, Senior Executive Assistant, OIG