



A bold voice for transportation workers

May 21, 2021

Mr. John Karl Alexy
Associate Administrator for Railroad Safety, Chief Safety Officer
Federal Railroad Administration
1200 New Jersey Avenue SE
Washington, DC

RE: Request for Extension – FRA-2021-0031

Dear Mr. Alexy,

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to FRA's request for comment on the Petition for Waiver of Compliance submitted by Union Pacific Railroad Company. TTD consists of 33 affiliate unions representing workers in all modes of transportation, including rail workers who conduct pre-departure inspections, service, and operate trains. We therefore have a vested interest in this policy.

TTD requests an extension of the comment deadline for this petition. This petition represents a broad waiver of numerous important safety regulations for air brakes and pre-departure inspections. In order to provide well-reasoned commentary, we request a 30-day extension of the comment period to consult with impacted rail workers and provide accurate assessments of the potential impacts of waiving the cited safety regulations. We are simultaneously requesting clarification from the agency regarding the specific application of this waiver, and we will need time to prepare comments after we receive the answers to our questions.

We believe that this petition would set a precedent for future petitions from other rail carriers seeking similar waivers from required brake inspections—the granting of which would alter core tenets of the FRA's regulatory oversight of train equipment. We believe that it is of utmost importance for FRA to do its due diligence to promote public comment on such a significant issue. The current comment deadline is insufficient for a petition of this scope, and we believe that the

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safety of our nation's rail system could be compromised if the petition is granted before potential consequences of this waiver are understood. It is our hope that the agency will grant the comment extension and publish notice of it quickly to ensure that all potential commenters are able to produce full statements.

We appreciate the opportunity to comment and look forward to working with the agency going forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Regan', with a large, stylized flourish at the end.

Greg Regan
President