



A bold voice for transportation workers

September 13, 2022

Mr. Thomas Coleman
National Transit Database Program Manager
Federal Transit Administration
1200 New Jersey Avenue, SE
Washington DC, 20590

**RE: National Transit Database Safety and Security Reporting Changes and Clarifications
Docket No. FTA-2022-0020**

Dear Mr. Coleman,

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to provide comments on the Federal Transit Administration's (FTA) proposed changes regarding National Transit Database (NTD) safety and security reporting. TTD consists of 37 affiliate unions and their workers, including transit operators, maintenance workers, and other operations personnel. TTD endorses the comments by our affiliates, the Amalgamated Transit Union (ATU) and the Transport Workers Union of America (TWU), which are also filed in this docket.¹ In particular, as stated by ATU, implementation of data collection must capture both physical and other forms of assault.

The proposed changes would incorporate the updated definition of "assault on a transit worker" for the purposes of NTD reporting. The Bipartisan Infrastructure Law amended 49 U.S.C. 5302(1) to define "assault on a transit worker" as a "circumstance in which an individual knowingly, without lawful authority or permission, and with intent to endanger the safety of any individual, or with a reckless disregard for the safety of human life, interferes with, disables, or incapacitates a transit worker while the transit worker is performing the duties of the transit worker."

TTD strongly supports this definition and amending the NTD reporting to reflect it. It is vital to the safety of our nation's transit workers that all assaults against workers are accurately counted and reported in a way that is understandable and usable by the general public and all stakeholders including labor and transit safety experts.

¹ Attached is a list of TTD's 37 affiliated unions.

Good policy relies on good data, and data on transit assaults has not kept up with the needs of workers. Separate data must be collected for workers and passengers so that trends can quickly be identified and safety improvements implemented as needed. Therefore, it is critical that FTA instruct grant recipients to keep track of and report to NTD all assaults on transit workers, both physical and non-physical.

No worker should be assaulted while carrying out their job, and TTD supports the efforts that the Department of Transportation (DOT) and FTA are taking to address the too-frequent assaults on transit workers. TTD appreciates the opportunity to comment on FTA's notice and looks forward to working with FTA in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Regan". The signature is stylized with a large initial "G" and "R".

Greg Regan
President