



*A bold voice for transportation workers*

October 24, 2022

Mr. William S. Schoonover  
Associate Administrator for Hazardous Materials Safety  
Pipeline and Hazardous Materials Safety Administration  
1200 New Jersey Avenue, SE  
Washington DC, 20590

**RE: Hazardous Materials: Request for Information on Electronic Hazard  
Communication Alternatives  
Docket No. PHMSA-2022-0043**

Dear Mr. Schoonover,

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to provide comments on the PHMSA's request for information (RFI) regarding electronic hazard communication. By way of background, TTD consists of 37 affiliate unions, including freight rail workers, first responders, and dispatchers who interact with hazardous materials on a daily basis.<sup>1</sup>

In the RFI, PHMSA seeks input regarding the potential use of electronic communication as an alternative to current, physical documentation requirements for hazard communication (e.g. shipping papers, train consists, dangerous goods manifests, notifications to the pilot in command, and emergency response information, as well as associated administrative documentation including DOT Special Permits, approvals, and registrations) concerning transportation of hazardous materials.

TTD urges PHMSA to recognize the varying needs regarding hazard communication that are present in different crafts. Operating and responding crafts, for instance, continue to need printed communication as an important alternate source of information should transporters or electronics be compromised. Dispatchers may have less use for printed communication, sometimes even preferring electronic communication that allows for easier access and storage. These crafts are individually positioned to know best for their respective members, and we strongly encourage PHMSA to consult with the relevant labor organizations to ensure that each craft has tools to act effectively to keep workers and the public safe.

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<sup>1</sup> Attached is a list of TTD's affiliated unions.

**Transportation Trades Department, AFL-CIO**  
815 Black Lives Matter Plaza, NW / 4<sup>th</sup> Floor / Washington DC 20006  
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Greg Regan, President / Shari Semelsberger, Secretary-Treasurer



At this time, it is clear that first responders and operating crafts have identified clear and present needs for the continued use of printed hazard communication, and PHMSA should continue this printed communication until such need no longer exists. It is too important a safeguard to get swept up in the trend of digitization. At the same time, for those crafts that prefer it, electronic communication should be allowed to continue, with appropriate monitoring to ensure that it does not pose a safety risk.

It will be vital that PHMSA work with labor organizations at every step of the process to best understand the conditions that workers experience every day. Safety must always be the highest priority, and we echo the comments submitted by our affiliate, the International Association of Fire Fighters (IAFF), that electronic communication technology is not mature enough to replace the need for printed communication completely whether it be due to lack of internet access in remote areas or because the access and control of electronic communication is not sufficient to meet the needs of operators and first responders.

We appreciate the opportunity to comment on this matter and look forward to working with PHMSA in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Regan', written over a circular stamp or mark.

Greg Regan  
President