



Transportation Trades Department, AFL-CIO

December 26, 2023

The Honorable Nuria Fernandez
Administrator
Federal Transit Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Updates to the Public Transportation Safety Certification Training Program
Docket No. FTA-2023-0025**

Administrator Fernandez:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the Federal Transit Administration's (FTA) notice of availability of proposed updates to its National Public Transportation Safety Plan. TTD consists of 37 affiliated unions, including those representing the majority of public transportation workers in the United States, who have a significant interest in ensuring the Public Transportation Safety Certification Training Program (PTSCTP) adequately addresses safety training needs.¹ Additionally, we endorse the comments filed by our affiliates, the Transport Workers Union of America (TWU) and the Transportation Division of the International Association of Sheet Metal, Air, Rail, and Transportation Workers (SMART-TD).

As the FTA explains, this NPRM proposes to amend the PTSCTP regulation at 49 CFR part 672. Specifically, the proposed rule adds administrative requirements for recipients that are subject to the requirements of the rule, in addition to maintaining the existing minimum training requirements for State Safety Oversight Agency (SSOA) employees and contractors who conduct reviews, inspections, examinations, and other safety oversight activities of public transportation systems, and employees and contractors who are directly responsible for the safety oversight of a rail fixed guideway public transportation system.

We appreciate the FTA's efforts through this NPRM to ensure SSOAs maintain and regularly communicate with FTA complete and accurate records of PTSCTP participants and individual refresher training requirements. It is imperative that the FTA is able to monitor PTSCTP

¹ Attached is a complete list of TTD's affiliate unions.

compliance and hold SSOAs accountable for meeting minimum training requirements. This type of proactive approach is integral to fostering transparency and accountability.

The FTA further requests comment on whether mandatory PTSCTP participation should extend to bus transit safety oversight personnel. These requirements should indeed extend to bus transit safety oversight personnel. The nature of their responsibilities within the transit sector warrants a comprehensive understanding of safety protocols and compliance with regulatory standards. Including bus transit safety oversight personnel in the mandatory PTSCTP participation ensures a consistent and high standard of safety knowledge across all facets of public transit.

In addition to the requirements proposed in this NPRM, we respectfully request that the FTA consider integrating the minimum safety training requirements with Infrastructure Investments and Jobs Act (IIJA)-mandated Safety Committees. Safety Committee members should be provided with the same minimum training as SSOA members in order to best understand the practical aspects of SSOA oversight responsibilities. Specifically, Safety Committee members should be required participants in the PTSCTP, and therefore required to complete FTA mandated PTSCTP curriculum.

As the FTA is aware, agency Safety Committees are responsible for, at a minimum: (1) identifying and recommending risk-based mitigations or strategies necessary to reduce the likelihood and severity of consequences identified through the agency's safety risk assessment; (2) identifying mitigations or strategies that may be ineffective, inappropriate, or were not implemented as intended; and (3) identifying safety deficiencies for purposes of continuous improvement. Given the responsibilities incumbent upon Safety Committees, we urge the FTA to establish consistency with regard to safety training for all personnel involved in safety related activities and oversight, including SSOA personnel and agency Safety Committee members. This alignment will foster a unified approach to maintaining safety standards across the transit sector. By establishing uniformity in safety training requirements for both SSOA personnel and agency Safety Committee members, the FTA will enhance collaboration, streamline safety practices, and ultimately contribute to the overall safety and well-being of transit workers and passengers.

We appreciate the opportunity to comment on this NPRM and look forward to working with the FTA 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