



Transportation Trades Department, AFL-CIO

August 19, 2024

Ms. Carolyn Hayward-Williams
Director, Office of Railroad Systems and Technology
Federal Railroad Administration
1200 New Jersey Avenue SE
Washington DC, 20590

RE: Central Florida Rail Corridor Request to Amend its Positive Train Control Safety Plan

Docket No. FRA-2011-0104

Ms. Hayward-Williams,

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the Federal Railroad Administration's (FRA) notice regarding Central Florida Rail Corridor's (CFRC) Request for Amendment (RFA) to modify its FRA-approved Positive Train Control Safety Plan (PTCSP) for its Interoperable Electronic Train Management Systems (I-ETMS). TTD consists of 37 affiliated unions representing the totality of rail labor and we therefore have a vested interest in this matter. Additionally, TTD endorses the comments of our affiliate, the Transportation Division of the International Association of Sheet Metal, Air, Rail and Transportation Workers (SMART-TD).

We understand that this request is identical to one submitted by 20 host railroads in late 2023, which was subsequently granted by the FRA. We feel it necessary to reiterate the safety concerns we noted in our comments in response to the joint PTC RFA last year given that the two requests are the same. In light of these safety implications, we must request that the FRA deny CFRC's request.

Changes to the Human-Machine Interface

TTD has previously commented on how Positive Train Control (PTC) systems provide an additional layer of safety for rail workers and the public.¹ These systems are designed to prevent train-to-train collisions, over-speed derailments, incursions into established work zones, and movements of trains through switches left in the wrong position. The National Safety Transportation Board (NTSB) first recommended that PTC be required in 1969 and Congress

¹ <https://ttd.org/policy/getting-our-nations-freight-rail-system-back-on-track/>

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Greg Regan, President / Shari Semelsberger, Secretary-Treasurer

subsequently mandated PTC systems in the 2008 Rail Safety Improvement Act (RSIA) to save lives and reduce injuries.

This RFA requests three specific material modifications to the human-machine interface (HMI) of CFRC's PTC system. These changes include the addition of a Target Approach Management (TAM) flag to the Cab Display Unit (CDU); the removal of the initialization key when the PTC System is Cut-in and in a Disengaged state, Active state, or Restricted state; and a change in the color of the "View All Prompts" soft key on all screens. Each of these changes appear on the surface to improve the user experience and may provide some safety benefit. However, we note that redactions in the filing make fully evaluating these modifications impossible. It is difficult to accept at face value the changes to the HMI outlined in the summary section of the filing are the only requested changes given that the entire document is 85 pages in length and includes heavy redactions.

Redacted Filings

While not infallible, PTC systems provide a crucial level of additional safety for all rail workers. It is therefore essential that stakeholders, including rail labor organizations, have the opportunity to fully examine changes to the HMI of these critical systems. The filing submitted as part of this amendment request contains extensive redactions and is technical in nature. These redactions make it virtually impossible for stakeholders and the public to fully assess the request and subsequently provide meaningful comments.

We have repeatedly urged the FRA to adopt guidance allowing for confidential undertakings modeled on the system that the Surface Transportation Board (STB) successfully utilizes. We reiterate that request here. Stakeholders, including labor unions, must be able to review all safety information in order to provide the FRA with accurate comments, and a confidential undertaking system would allow for this while also protecting legitimate confidential business information and safeguarding data security.

We respectfully request that the FRA take our feedback on this matter into consideration. We appreciate the opportunity to provide public comment and we look forward to working with the FRA in the future.

Sincerely,



Greg Regan
President