



Transportation Trades Department, AFL-CIO

January 7, 2025

Amitabha Bose  
Administrator  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**RE: Notice of Proposed Rulemaking Regarding Track Geometry Measurement System Inspections  
Docket No. FRA-2024-0032**

Administrator Bose:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the Federal Railroad Administration's (FRA) notice of proposed rulemaking (NPRM) regarding revisions to its regulations governing the minimum safety requirements for railroad track. TTD consists of 37 affiliated unions representing the totality of rail labor, and we therefore have a vested interest in this matter.<sup>1</sup> For the reasons outlined below, we respectfully request that the FRA swiftly finalize this proposed rule without any substantive changes.

In addition, TTD strongly endorses the comments of our affiliate, the Brotherhood of Maintenance of Way Employees Division (BMWED). The BMWED represents tens of thousands of railroad track workers, including track inspection professionals, across the United States. The dedicated members represented by the BMWED are the on-the-ground experts in railroad track inspection and repair who will be directly affected by the FRA's proposal. We therefore encourage the FRA to thoughtfully consider the response to this NPRM filed by the BMWED, which goes into much greater detail on the matters raised here as well as others.

The FRA is proposing regulations to amend 49 CFR part 213, Track Safety Standards (TSS), which prescribe the minimum safety requirements for railroad track. The proposed changes would require all Class I and II railroads, as well as intercity passenger railroads and commuter railroads, to operate a qualifying Track Geometry Measurement System (TGMS), at specified frequencies on all Class 1 through 5 mainline and controlled siding track that transports: (1) annual tonnage greater than 10 MGT; (2) regularly scheduled passenger rail service; or (3) trains containing

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<sup>1</sup> Attached is a complete list of the labor unions affiliated with TTD.

hazardous materials, as defined in 49 CFR 171.8. The FRA also proposes increasing the required frequency of TGMS inspections on Class 6 track.

This NPRM aims to ensure that advanced inspection tools, such as TGMS, are effectively integrated into the rail system to enhance both the safety and the reliability of the nation's rail network. These tools, which provide continuous monitoring of track conditions, are intended to complement human inspections rather than replace them. The NPRM also emphasizes that railroads must deploy this technology in a manner that upholds the FRA's rigorous human inspection standards. By doing so, the proposed rule underscores the critical role of human expertise in addressing complex, nuanced issues that automated systems might overlook.

As the BMWED notes in its comments on this docket, "The NPRM ensures that any identified defects must be remediated swiftly, reinforcing a commitment to timely interventions. This careful balance of technology and expert human judgment is essential for upholding safety standards under challenging workforce conditions." The dual approach outlined in the NPRM leverages the strengths of both technology and highly-skilled human oversight to create a more robust and efficient inspection framework. Automated systems add an extra layer of safety by detecting anomalies at a frequency that could be challenging for manual inspections alone. Simultaneously, human inspectors dedicate specialized attention to intricate challenges, interpret data generated by automated tools, and make judgment calls that technology cannot replicate. We appreciate that this NPRM strikes a thoughtful balance that prioritizes public safety while respecting the indispensable contributions of the workforce tasked with preserving the integrity of the rail network.

In conclusion, we urge the FRA to expeditiously finalize this proposed rule without any substantive changes. We appreciate the opportunity to comment on this docket and look forward to working with the FRA 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