

June 24, 2025

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

**RE: Union Pacific Railway's Request To Amend Its Positive Train Control System Territory  
Docket No. FRA-2010-0061**

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 Union Pacific Railway's (UP) request for amendment (RFA) to its FRA-approved Positive Train Control Implementation Plan (PTCIP). Specifically, UP requests FRA's approval for a yard limit extension. TTD consists of 38 affiliated unions representing the totality of rail labor, including the conductors and locomotive engineers who utilize PTC Systems in their day to day work.<sup>1</sup> We therefore have a vested interest in this matter and respectfully request that the FRA deny UP's request. Additionally, TTD endorses the comments of our affiliates, the Transportation Division of the International Association of Sheet Metal, Air, Rail and Transportation Workers (SMART-TD) and the Brotherhood of Locomotive Engineers and Trainmen (BLET).

**Extensive Redactions Warrant Denial**

Similar to many recent PTC filings, UP has redacted significant portions of this petition, including the specific yard limits and line segments subject to the request. These redactions prevent stakeholders and the public from fully assessing the scope, and therefore merits, of UP's request. Furthermore, without any real understanding of the scope of UP's requested changes, it is impossible for stakeholders to determine if they would ultimately be in the public interest. It is unclear what, if any, confidential business information is involved in this request that necessitated such sweeping redactions. The workers impacted by these changes, and their labor organizations, must be allowed to examine the complete request and subsequently provide meaningful comments.

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

TTD has repeatedly commented on the benefits of PTC Systems and the additional level of safety PTC provides for all rail workers.<sup>2</sup> While PTC is not infallible, it is a necessary redundancy and one of the many crucial safety elements of our rail system. It is therefore essential that stakeholders, including rail labor organizations, have the opportunity to fully examine changes to these critical systems. As such, we encourage the FRA to expeditiously respond to the Freedom of Information Act requests filed by the BLET and SMART-TD relative to UP's filing and release the requested information.

As the regulatory agency, FRA has a duty to not only ensure that railroad operations are conducted safely, but that the public has opportunities to engage and be assured that railroad safety is being actively enforced. 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,

A handwritten signature in black ink, appearing to read 'Greg Regan', enclosed within a circular outline.

Greg Regan  
President

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<sup>2</sup> <https://ttdd.org/policy/getting-our-nations-freight-rail-system-back-on-track/>