

9.2.25 TTD Responses to FRA and PHMSA Regulatory Proposals

The Transportation Trades Department, AFL-CIO (TTD), submitted the following federal comments to the Federal Railroad Administration's (FRA) and Pipeline and Hazardous Materials Safety Administration (PHMSA's) notices of proposed rulemaking (NPRMs) and final rules. The full dockets can be accessed [here](#):

FRA:

1. Final Rule, Docket No. FRA-2025-0080: [Administrative Updates to the Federal Railroad Administration's State Safety Participation Regulations](#) - **TTD petitions for repeal of final rule**
2. Final Rule, Docket No. FRA-2025-0099: [Brake System Safety Standards for Freight and Other Non-Passenger Trains and Equipment; End-of-Train Devices Regulations](#) - **TTD petitions for repeal of final rule**
3. NPRM, Docket No. FRA-2025-0123: [Miscellaneous Amendments to FRA's Accident Reporting Regulations](#) - **TTD requests suspension of rulemaking**
4. NPRM, Docket No. FRA-2025-0130: [Amendments to Brake System Maintenance and Inspection Requirements](#) - **TTD requests suspension of rulemaking**
5. NPRM, Docket No. FRA-2025-0127: [Permitting Use of Virtual Simulation for Periodic Refresher Training on Brake Systems](#) - **TTD requests suspension of rulemaking**
6. NPRM, Docket No. FRA-2025-0119: [Regulatory Relief for End of Car Cushioning Units](#) - **TTD requests suspension of rulemaking**
7. NPRM, Docket No. FRA-2025-0126: [Expanding Certain Locomotive Wheel Set Diameter Variations](#) - **TTD requests suspension of rulemaking**
8. NPRM, Docket No. FRA-2025-0117 - [Repealing Special Approval Requirement for Freight Cars More Than 50 Years Old](#) - **TTD requests suspension of rulemaking**
9. NPRM, Docket No. FRA-2025-0122: [Allowing for the Electronic Posting of Reportable Injuries and Occupational Illnesses](#) - **TTD requests modifications**
10. NPRM, Docket No. FRA-2025-0133 - [Qualification and Certification: Conductors](#) - **TTD requests modifications**
11. NPRM, Docket No. FRA-2025-0132: [Qualification and Certification: Locomotive Engineers](#) - **TTD requests modifications**
12. NPRM, Docket No. FRA-2025-0131: [Qualification and Certification: Locomotive Engineers and Conductors; Incorporation of Longstanding C3RS Waivers](#) - **TTD requests modifications**
13. Final Rule, Docket No. FRA-2025-0105 - [Administrative Updates to Bridge Safety Standards](#) - **TTD requests additional transparency**
14. NPRM, Docket No. FRA-2025-0129 - [Repealing Certain Bridge Load Capacity Evaluation Requirements](#) - **TTD recommends future safety improvements**
15. NPRM, Docket No. FRA-2025-0083: [Repealing Outdated Railroad Workplace Safety Requirements](#) - **TTD requests modifications**
16. NPRM, Docket No. FRA-2025-0120: [Regulatory Relief to Allow Speeds Up to 45 MPH for Non-Traversable Curbs](#) - **TTD requests modifications**

PHMSA:

1. NPRM, Docket No. PHMSA-2025-0095: [Hazardous Materials: Improving Efficiencies for Special Permits and Approvals Renewals](#) - **TTD requests suspension of rulemaking**
2. NPRM, Docket No. PHMSA-2025-0092: [Hazardous Materials: Reducing Undue Paperwork Burdens to Domestic Carriers](#) - **TTD requests modifications**