



Transportation Trades Department, AFL-CIO

September 2, 2025

Kyle Fields
Chief Counsel
Federal Railroad Administration
1200 New Jersey Avenue SE
Washington DC, 20590

RE: Permitting Use of Virtual Simulation for Periodic Refresher Training on Brake Systems
Docket No. FRA-2025-0127

Mr. Fields:

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) that would allow railroads to use three-dimensional virtual simulation to satisfy the hands-on portion of periodic refresher training under the FRA's brake system training requirements. TTD consists of 39 affiliate unions representing workers across every mode of transportation, including the freight rail workers that will be directly impacted by this proposed rule.¹ TTD and our affiliates have long argued that virtual training is not a sufficient substitute for hands-on training in many cases.² We therefore respectfully request that the FRA rescind this proposed rule. Additionally, we endorse the comments filed in this docket by our affiliates, the Brotherhood of Railway Carmen Division (BRC) of the Transportation Communications Union (TCU/IAM), 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).

Hands-on training provides an unparalleled level of instruction and safety that virtual training simply cannot provide. A simulator is inherently incapable of fully replicating every aspect of a real life scenario, including factors like weather conditions or physical and olfactory sensory inputs. The FRA's proposal to codify existing waivers that permit several railroads to substitute virtual training for hands-on training neither serves the public interest nor is consistent with railroad safety, as is required by statute 49 U.S.C. 20103(d). Rail labor has consistently opposed these waivers given the safety concerns resulting from the substandard training provided by virtual

¹ Attached is a complete list of the unions affiliated with TTD.

² For example, see TTD's comments to Docket Numbers FRA-2020-0045, FRA-2020-0001, and FRA-2018-0075

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Greg Regan, President / Shari Semelsberger, Secretary-Treasurer

simulators when not used in conjunction with hands-on training. The work of rail workers who perform brake system inspections, tests, and maintenance is physical by nature. It is a disservice to these dedicated employees to not provide them with hands-on training that physically, rather than virtually, replicates real-world scenarios.

In addition, it is imprudent for the FRA to permit the use of virtual training in place of hands-on training without verifying that the virtual training programs railroads intend to utilize are capable of providing the same quality and level of training as hands-on exercises. This level of due diligence is necessary given that many of these technologies and software programs are newly developed and their efficacy may be unproven.

Beyond the immediate dangers of substituting simulations for brake training, this NPRM also sets a dangerous precedent. If the FRA permits railroads to replace tactile, field based training with virtual substitutes in one area, carriers will push to expand the same model to other crafts and safety critical tasks. This includes roadway worker training, machine qualification, bridge inspection, and the certification of track inspectors. Such a precedent would undercut the foundation of hands on, experience based safety practices that the FRA has historically recognized as essential. Once virtual substitution becomes a regulatory standard, the burden will fall on workers to prove why real world training remains necessary, rather than on railroads to justify cutting it.

The FRA's proposed rule would unnecessarily compromise the safety of rail employees and passengers. Hands-on training is paramount to understanding the intricacies of maintaining and inspecting all critical safety equipment and cannot be accomplished in a virtual setting alone. For the reasons outlined above, we respectfully request that the FRA rescind this proposed rule and reconsider safety waivers that allow virtual training to satisfy hands-on training requirements.

We appreciate the opportunity to comment on this matter and look forward to working with the FRA in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Regan', with a stylized flourish at the end.

Greg Regan
President