



Transportation Trades Department, AFL-CIO

September 2, 2025

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

**RE: Repealing Certain Bridge Load Capacity Evaluation Requirements
Docket No. FRA-2025-0129**

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) regarding bridge load capacity evaluation requirements. TTD consists of 39 affiliate unions representing workers in all modes of transportation, including rail workers who will be affected by this proposal.¹ We urge the FRA to take our comments into consideration. In addition, we strongly endorse the comments filed in this docket by our affiliate, the Brotherhood of Maintenance of Way Employees Division of the International Brotherhood of Teamsters (BMWED).

Background

This NPRM proposes to eliminate the Federal requirement that defines the process a track owner must follow when scheduling the evaluation of bridges with no load capacity determination. The requirement was intended as a transitional measure to phase in compliance after the bridge safety regulations became effective.

Proposed Repeal of § 237.71(e)

TTD echoes the BMWED's support for the FRA's proposal to remove § 237.71(e) from the Code of Federal Regulations (CFR), which required track owners to complete initial load capacity determinations for previously unrated bridges within five years of implementing a Bridge Management Program (BMP). We concur with the FRA's assessment that this requirement is now obsolete.

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

Alignment with FHWA Bridge Oversight Practices

We encourage the FRA to thoughtfully consider the BMWED's recommendations with regard to aligning Part 234 with the longstanding bridge inspection and evaluation practices employed by the Federal Highway Administration (FHWA) under the National Bridge Inspection Standards (NBIS).

The BMWED's recommendations include incorporating standardized inspection intervals, load rating protocols, and common terminology that could enhance consistency across the national transportation network. While we recognize that there are differences between the operational and structural characteristics of railroad and highway bridges, harmonizing certain fundamental practices could improve regulatory transparency and simplify compliance. We agree with the BMWED that the FRA may consider initiating a task to evaluate these recommendations through the Rail Safety Advisory Committee (RSAC).

Conclusion

We acknowledge the FRA's effort to simplify existing regulations. We respectfully request that the Agency thoughtfully evaluate the recommendations proposed by our affiliate, the BMWED, with regard to modernizing bridge safety regulations. 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', enclosed within a circular stamp or seal.

Greg Regan
President