

November 18, 2025

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

RE: National Railroad Passenger Corporation's Request To Amend Its Positive Train Control System
Docket No. FRA-2010-0029

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 the National Railroad Passenger Corporation's (Amtrak) requests for amendment (RFA) to its FRA-certified Positive Train Control (PTC) system, the Interoperable Electronic Train Management System (I-ETMS). Specifically, Amtrak submitted two RFAs to its I-ETMS PTC system which seek FRA's approval for regular quarterly and biannual PTC outages to perform I-ETMS back office subsystem stability and reliability upgrades through December 2030. TTD consists of 40 affiliated unions representing the totality of rail labor, including the conductors and locomotive engineers who utilize PTC Systems in their day to day work.¹ We therefore have a vested interest in this matter and respectfully request that the FRA deny Amtrak's request that would last for five years, which is an extremely long period of time. Additionally, TTD endorses the comments of our affiliates, the Brotherhood of Locomotive Engineers and Trainmen (BLET) and the Transportation Division of the International Association of Sheet Metal, Air, Rail, and Transportation Workers (SMART-TD).

Blanket Approval Sets a Concerning Precedent

Under 49 CFR 236.1021(e), the FRA must publish a notice in the Federal Register and invite public comment in accordance with 49 CFR part 211, if an RFA includes a request for approval of a material modification of a signal or train control system. The FRA submits that the notice published on October 3, 2025 would satisfy this requirement for each of Amtrak's quarterly and biannual planned PTC outages through December 2030. Until this point, each of the RFAs subject to the requested approval would go through the normal public notice and comment period. The public deserves the opportunity to evaluate and provide feedback in response to the requested

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

changes and necessary outages each time Amtrak's I-ETMS undergoes stability and reliability upgrades.

Approving PTC and I-ETMS updates, upgrades, and subsequently required outages in a blanket manner subverts the public engagement process and ignores the reality that circumstances can change significantly over the course of five years.

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 thin black rectangular border.

Greg Regan
President