

May 14, 2026

John Karl Alexy  
Associate Administrator for Railroad Safety, Chief Safety Officer  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**RE: Petitions for Special Approval of One-Person Train Crew Operations  
Docket No. FRA-2026-0563**

Mr Alexy:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the Federal Railroad Administration's (FRA) notice regarding Georgia Central Railway's petition for special approval to operate with a one-person train crew. TTD consists of 39 affiliated unions representing the totality of rail labor, including the locomotive engineers and conductors that will be directly impacted by the approval of this petition.<sup>1</sup> In addition to our own comments, TTD strongly endorses the comments of our affiliate, the Brotherhood of Locomotive Engineers and Trainmen (BLET) and the Transportation Division of the International Association of the Sheet Metal, Air, Rail, and Transportation Workers (SMART-TD). For the reasons outlined below, we respectfully request that the FRA deny Georgia Central's petition for special approval.

Georgia Central's petition attempts to substitute technology in the place of a human conductor for nothing more than *potential* operational efficiency. As TTD and our affiliates have argued for years, two crew members in the cab of the locomotive are essential on freight trains.<sup>2</sup> There are many situations where two-person crews can address safety issues that one-person crews cannot. These situations include: communication with other personnel such as train masters or train dispatchers; addressing emergency situations when they arise, including communication with first responders; a derailment or accident where one crewperson becomes incapacitated; dealing with a train blocking a crossing; communication and other issues resulting from long trains; mechanical issues that require detection and inspection; fatigue of the crewmember(s) and the need to stay alert.

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

<sup>2</sup> <https://www.regulations.gov/comment/FRA-2021-0032-13049>

In the risk assessment accompanying Georgia Central's request, the railroad states that the conductor "will perform all functions as those of an assigned conductor to the train at initial terminal, interchange, and points in between as necessary, including but not limited to, road crossing protection and operation of mis-aligned switches. [And] will remain in close proximity to the train to ensure radio communication is available at all times." Given that the conductor must remain in close proximity to the train, it is unclear what, if any, operational efficiency would be gained by removing the conductor from the train. As explained further below, the safety risks associated with trains operating with fewer than two crewmembers far outweigh any supposed advances in efficiency.

Concerningly, Georgia Central claims that an onboard alerter device is capable of replacing a human conductor in cases where the locomotive engineer becomes incapacitated. This is simply impossible. An alerter, unlike a conductor, cannot render aid and quickly communicate with first responders and train dispatchers. Fire fighters and EMS personnel train to respond to rail emergencies; however, they rely on fully-staffed rail crews to assist in these situations. The presence of a conductor is therefore critical.

Additionally, while Georgia Central submitted that it will not be transporting hazardous materials during these operations, other trains carrying hazardous materials will be operating on these lines. If a train being operated by a single crewmember were to collide with another train transporting hazardous materials, expecting one crewmember to execute every required task in an emergency while anticipating all possible operating scenarios poses unnecessary risk to not only the train's operator, but first responders and the wider community, as well.

In conclusion, we again respectfully request that the FRA deny Georgia Central's petition for special approval. We appreciate the opportunity to comment on this docket and look forward to working with the FRA in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Regan", enclosed in a faint circular stamp.

Greg Regan  
President