Transportation Trades Department, AFL-CIO

November 9, 2026

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

RE: Application for Approval of Discontinuance or Modification of a Railroad Signal System
Docket No. FRA-2026-2377

Mr. Alexy:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am responding to the Federal Railroad Administration's (FRA) Notice of Application for Approval of Discontinuance or Modification of a Railroad Signal System regarding Norfolk Southern's (NS) request related to cab signal systems. By way of background, TTD consists of 39 unions whose members work in all modes of transportation, including locomotive engineers, conductors, signal employees, and many others.[1] As such, we have a vested interest in this matter and urge the FRA to deny NS' request.

Specifically, NS requests to discontinue legacy cab signal systems and transition the subject territory to a block system implementation enforced by positive train control (PTC). The change would be implemented on 14 line segments in Pennsylvania and Ohio, where operators routinely experience PTC outages. We must note that one of these line segments, extending west from West Conway, PA (PC 24.5) to Alliance, OH (PC 83.2), is the same line segment where the East Palestine derailment occurred. NS, whose safety practices failed to prevent this derailment, should not be permitted to discontinue its cab signals on this territory without adequate safeguards in place. This application does not establish adequate safeguards.

NS states that the discontinuance will maintain and enhance operational safety in the area by "consolidating movement authority supervision and speed enforcement" into NS's existing PTC system. This is intended to "reduc[e] the potential for conflicting indications between parallel systems" and "eliminat[e] failure modes associated with coded track-circuit cab signal transmission." The application further explains that information currently conveyed through coded

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

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track circuits will instead be communicated through wayside interface units (WIUs), PTC messaging, and onboard processing.

An FRA-certified PTC system does not automatically establish that eliminating an existing cab signal system will preserve the safety functions, failure protections, and operating characteristics of the current configuration. Cab signal systems are engineered, fail-safe protection designed to function independently of human performance, and their removal in this case constitutes a serious safety concern.

TTD continues to maintain that PTC is an important safety overlay and a beneficial railroading tool. However, NS' request does not adequately account for PTC outages that will leave crews without a fail-safe system to rely on, especially given the railroad's removal of wayside signals on much of its cab signal system territory. Furthermore, NS' proposal raises substantial questions concerning PTC certification assumptions, the removal of existing redundancy, changing field conditions, communication reliability, degraded operations, and the continued applicability of federal signal and train control requirements. PTC does not replicate continuous in-cab signal indication in the same manner, nor does it serve as a universal substitute for cab signal systems across all operating conditions and failure modes. NS has failed to provide a sufficient technical and regulatory justification demonstrating that the proposed configuration will preserve the necessary safety protections and comply with all applicable federal requirements. The removal of existing signal equipment cannot serve as its own justification for eliminating established regulatory safeguards.

NS states that "all movements are intended to be made with a fully functioning PTC System. If PTC becomes unavailable, movements will be governed by 49 CFR § 236.1029 en route failure requirements." Rather than relying on cab or wayside signals in the event of a PTC failure, which would allow operations to continue at faster speeds, the fallback option in this case would require speed restrictions that would hamper efficiency and reliability.

The proposal also introduces significant dispatching complexity. Norfolk Southern identifies revised procedures for reverse movements, Proceed to Next Interlocking indications, and boundaries between different methods of operation. Implementation would be phased through 2030, leaving dispatchers responsible for territories subject to differing rules and train-control configurations.

NS argues that discontinuing the cab signal system eliminates unnecessary redundancy between PTC and cab signaling. In territory lacking wayside signals, including that subject to this waiver, cab signals are not redundant; they are the primary system governing movement authority and enforcement. Furthermore, in an industry as dangerous and unpredictable as railroading, safeguards like these are essential to safe operations. Overreliance on PTC, a technology known to experience outages, without a cab signal system or wayside signals in place, represents an

unacceptable safety and reliability risk. Again, we respectfully urge the FRA to deny this application.

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

Sincerely,



Greg Regan
President