



September 2, 2025

The Honorable Marcus J. Molinaro
Administrator
Federal Transit Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Federal Transit Administration Public Transportation Safety Certification Training Program
Notice of Proposed Rulemaking (Docket No. FTA–2025–0009)

Dear Administrator Molinaro,

The American Public Transportation Association (APTA) represents a \$79 billion industry that directly employs 430,000 people and supports millions of private-sector jobs. APTA supports the Federal Transit Administration’s (FTA) commitment to streamline regulations. APTA and FTA have a long history of successful partnership and collaboration, and we look forward to continuing this important work together.

Safety is the number one core value of the public transportation industry, including bus, rail, commuter and intercity rail and ferry operators. The employees responsible for managing and operating public transportation systems are fully committed to the safety of their systems, passengers, fellow employees, and the public. As a result of this commitment to safety, traveling by public transportation is ten times safer per mile than traveling by car. We greatly appreciate the open dialogue, successful collaboration, and productive engagement between FTA and APTA regarding safety. We also appreciate the opportunity to respond to FTA’s Public Transportation Safety Certification Training Program (PTSCTP) Notice of Proposed Rulemaking (NPRM) published in the *Federal Register* at 90 FR 28697 on July 1, 2025 (FTA PTSCTP NPRM).

First, APTA applauds FTA’s proposal to modify 49 C.F.R. § 672.21(d) to require annual, rather than semiannual, reporting of compliance with safety training reporting requirements. As APTA noted in its comments to the Department of Transportation (DOT) Request for Information on reducing regulatory burdens, “the requirement that a transit agency update and make sure everyone is active and current for their Public Transportation Safety Certification Program (PTSCTP) certification every six months is an undue burden at 672.21(d).” FTA’s modification will greatly relieve this burden on APTA’s member transit agencies by only having them report this information annually. We truly appreciate FTA addressing this concern in the NPRM and urge the agency to adopt it in the final rule.

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Paul P. Skoutelas

1300 I Street NW | Suite 1200 East | Washington, DC 20005

(202) 496-4800 | [APTA.COM](https://www.apta.com)

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As APTA noted in its [May 5, 2025 response to DOT's Regulatory Reform Request for Information](#) on regulatory burdens, there are other aspects of the PTSCTP final rule that we encourage FTA to revisit to reduce regulatory and other burdens. These include:

- **Requiring candidates to attain a full PTSCTP certification, regardless of background and skill set**—The rule requires designated employees to attain a full PTSCTP certification, including multiple courses. However, even if an agency were to hire police officers (or others) who have conducted numerous bus and rail accident and incident investigations, if candidates do not have the full PTSCTP certification, they cannot complete many of their required duties. Thus, even if prospective candidates have the necessary skill set for the position for which they were hired, this requirement may prevent transit agencies from carrying out their mission until a person completes the required PTSCTP courses, as per the Part 672 final rule.
- **Limited access (currently) to the necessary Transit Safety Institute (TSI) classes required under the PTSCTP Part 672 final rule**—Lack of access to TSI courses is another impediment for transit agencies to fully train those that need to attain their PTSCTP certification.

Conclusion

APTA appreciates the opportunity to comment on this important proposal and looks forward to continuing to work with you on this matter. If you have any questions, please contact Brian Alberts, Senior Director Safety and Advisory Services, at (202) 496-4885 or balberts@apta.com, or Taria Barron, General Counsel, at (202) 496-4808 or tbarron@apta.com. Thank you for your consideration and we look forward to continuing to work with FTA to streamline regulations and improve transportation safety.

Sincerely,



Paul P. Skoutelas
President and CEO