



**American  
Public Transportation  
Association**

August 6, 2024

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**APTA.COM**

The Honorable Amitabha Bose  
Administrator  
Federal Railroad Administration  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

Subject: Docket No. FRA-2022-0019 & FRA-2022-0020

Dear Administrator Bose,

The American Public Transportation Association (APTA) represents a \$79 billion industry that directly employs 430,000 people and supports millions of private-sector jobs. We greatly appreciate the ongoing dialogue between APTA and the Federal Railroad Administration (FRA) regarding improving safety for those who ride and work for railroads.

We were grateful for the opportunity to provide input into the FRA's proposed regulations for the certification of dispatcher and signal employees, both through our comments on the Notice of Proposed Rulemaking (NPRM) and APTA's inclusion in the Railroad Safety Advisory Committee Working Group. We also appreciate the agency's detailed and thoughtful responses to our comments. Having thoroughly reviewed the final rule and consulted with our member organizations, many of which are currently beginning the work of complying with the rule, we write today to urge the FRA to adjust the deadline for submission of completed programs for commuter railroads from March 22, 2025, to July 22, 2025.

Dispatcher and signal employees have a vital role in ensuring safety for passengers and workers. They are responsible for routing trains safely and coordinating emergency response, as well as installing, testing, troubleshooting, repairing, and maintaining signal systems. Creating a certification system for dispatcher and signal employees will ensure a

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formal training process and verify that employees are skilled and able to perform their duties.

However, the final rule requires railroads providing commuter service to submit their written certification programs to the FRA no later than eight months after the rule's effective date, May 22, 2025. Due to the complex nature of developing these certification programs, our members have expressed that they require more time to submit their certification programs.

The FRA acknowledges that the creation of a certification program will be a lengthy process. However, the Regulatory Impact Analysis for these rules was incorrect to assume that the current training programs of commuter railroads are comparable to Class I railroads and Amtrak. Unlike Amtrak and Class I railroads, many commuter railroads contract their dispatch and signal responsibilities and do not have the internal expertise required to create these programs. Accordingly, commuter railroads will have to undergo a hiring process to acquire the needed expertise to draft the new certification programs.

With these added difficulties in mind, we urge the FRA to adjust the deadline for submission of completed programs from March 22, 2025, to July 22, 2025.

Thank you for your consideration and we look forward to working with you on efforts to continue improving safety for all those who ride and work for railroads.

If your staff have any questions regarding this letter, please contact Bryan Sooter, Director, Standards, at [bsooter@apta.com](mailto:bsooter@apta.com).

Sincerely,



Paul P. Skoutelas  
President and CEO