



September 2, 2025

Kyle Fields
Chief Counsel
Federal Rail Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Docket Number FRA-2025-0130

Dear Mr. Fields,

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 Railroad Administration's (FRA's) commitment to streamline regulations. APTA and FRA have a long history of successful partnership and collaboration, and we look forward to continuing this important work together.

APTA is submitting comments to docket number FRA-2025-12168, Amendments to Brake System Maintenance and Inspection Requirements, published in the *Federal Register* on July 1, 2025, on behalf of its member passenger railroads. We appreciate that FRA is seeking feedback from the railroad industry. These comments were derived from discussions with our members, and we believe that the incorporation of the changes proposed herein would better reflect the current capabilities of electronic air brake (EAB) systems.

Specifically, in the text within the NPRM at 49 CFR § 229.29(b)(1) and 49 CFR § 238.307(d)(4) it is proposed that:

“Locomotives equipped with electronic air brake (EAB) control valves, must execute and pass a self-test of the operational health of the brake system.”

“For passenger equipment equipped with an EAB system, a self-test of the operational health of the brake system must be performed and successfully passed as part of the periodic mechanical inspection.”

Our members noted that many of their locomotives with EAB control valves do not possess this self-test feature.

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Importantly, the cost analysis for the NPRM does not take into account the cost of retrofitting these locomotives with self-test features nor does it provide an alternative for locomotives with EAB control valves that do not have self-test capabilities. Thus, APTA proposes that the wording be changed as follows:

“Locomotives equipped with electronic air brake (EAB) control valves **and a self-test feature**, must execute and pass a self-test of the operational health of the brake system.”

“For passenger equipment equipped with an EAB system **and a self-test feature**, a self-test of the operational health of the brake system must be performed and successfully passed as part of the periodic mechanical inspection.”

APTA appreciates the opportunity to comment on this NPRM. If you have questions regarding this letter, please contact Bryan Sooter, Senior Director of Standards and Rail Engineering at (202) 496-4851 or bsooter@apta.com, or contact 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 FRA to streamline regulations and improve railroad safety.

Sincerely,



Paul P. Skoutelas
President and CEO