



**American
Public Transportation
Association**

December 2, 2022

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U.S. Department of Transportation
Docket Operations (M-30),
West Building Ground Floor, Room W12-140,
1200 New Jersey Avenue, SE.,
Washington, DC 20590

Re: Docket No. FRA-2020-0017

Dear Docket Clerk:

The American Public Transportation Association (APTA) represents an \$80 billion industry that directly employs 450,000 people and supports millions of private-sector jobs. We are pleased to offer comments regarding the Federal Railroad Administration's (FRA) Notice of Proposed Rulemaking (NPRM) on Training, Qualification, and Oversight for Safety-Related Railroad Employees published in the *Federal Register* at 87 FR 59749 on October 3, 2022.

APTA members have raised concerns that the manner of removing implementation dates from 49 C.F.R. § 243.201 as proposed creates ambiguity regarding applicability of Part 243 required initial training/on-the-job (OJT) to employees whose designation was declared by the implementation date (September 1, 2020, or January 1, 2022, as applicable). APTA members request that FRA clarify (in the preamble or within the regulation, as appropriate) that for such employees whose designation was declared by the applicable implementation date, their initial qualification to perform safety-related service in that occupational category or subcategory remains based upon the initial training/qualification provided before the implementation date (September 1, 2020, or January 1, 2022, as applicable).

If there are any questions regarding this letter, please contact Linda Ford, APTA's General Counsel, at lford@apta.com.

Sincerely,

Paul P. Skoutelas
President and CEO

PRESIDENT AND CEO

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