



ASSOCIATION OF
AMERICAN RAILROADS



American Short Line and
Regional Railroad Association



AMERICAN
PUBLIC
TRANSPORTATION
ASSOCIATION

March 21, 2020

VIA ELECTRONIC MAIL

Ronald L. Batory
Administrator
Federal Railroad Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E. Washington, D.C.
20590

RE: FRA Emergency Relief Docket No. FRA-2020-0002

Dear Administrator Batory:

The Association of American Railroads ("AAR"), the American Short Line and Regional Railroad Association ("ASLRRA") and the American Public Transportation Association ("APTA"), on behalf of themselves and their member railroads, petition FRA for relief from the below-listed federal railroad safety regulations.¹ This relief is requested under FRA's Emergency Relief Docket No. FRA-2020-0002 and under the procedures at 49 C.F.R. Part 211.

The President has declared a nationwide emergency pursuant to 42 U.S.C. § 5191(b). This declaration, and the opening of the emergency relief docket, are in response to Coronavirus Disease 2019 (COVID-19) outbreaks and their effects on people and the immediate risk they present to public health, safety and welfare across the U.S. Based on information pertaining to the spread of COVID-19, railroads anticipate that staffing levels will be significantly affected as fewer railroad employees and contractors will be available to perform necessary duties due to quarantine, illnesses, and isolation directives. A reduction in availability of employees due to COVID-19 outbreaks affects railroads' ability to keep freight trains carrying critical goods and materials necessary for our country's welfare operating during this emergency. Compliance with all federal railroad safety regulations in light of a workforce shortage in this emergency situation would significantly hinder the railroads' ability to operate. In addition, limited resources, or directives imposed on a geographic location by other government agencies, could lead to

¹ The attached Appendix lists the AAR, ASLRRA, and APTA member railroads that may utilize any relief granted by FRA in response to this petition.

operational limitations that could result in undue delay to the transportation of critical commodities needed to sustain life during this crisis. In such circumstances, relief will be needed to allow for the continued movement of necessary and critical rail freight shipments.

The relief requested below will allow for operational adaptations needed to maintain public health and safety (e.g., transportation of coal for utilities, chlorine for water treatment plants, and necessary goods needed to sustain life) while rapidly evolving government and private health and safety efforts disrupt normal operational patterns and staff availability. The railroads also note that Transport Canada (“TC”), the government agency in Canada responsible for regulating railroad safety, has issued a temporary exemption from TC safety rules and regulations governing the qualification of railroad employees, railroad operating rules, and track safety standards in light of the COVID-19 pandemic (see attached).

In light of this unprecedented emergency situation, the railroads request expedited handling of the below-listed requests for relief from the federal railroad safety regulations. These requests for relief are not inconsistent with safety. Many of the requests parallel past waivers or tests that did not compromise safety, and compliance with the requests would reduce employee exposure in many instances.

49 C.F.R. Part 213

The railroads request relief from various time-interval dependent requirements in Part 213 during the COVID-19 emergency. Railroad staffing levels will be significantly affected during this emergency as fewer employees become available to perform necessary track inspection and other duties due to quarantine and illness. Without sufficient engineering staff, completion of all time-based requirements specified by Part 213 may not be possible. Therefore, the railroads request temporary relief from the following provisions:

- Relief from inspection frequencies specified in § 213.233, as those frequencies may not be capable of being maintained during a period with significant workforce shortages;
- Relief from § 213.234, as testing frequencies over track constructed with concrete ties may not be capable of being maintained during a period of significant workforce shortages; and,
- Relief from § 213.237, as testing frequencies for internal rail inspections may not be capable of being maintain during a period of significant workforce shortages; and
- Relief from Part 213’s requirements that defects be repaired within 30 days.

49 C.F.R. § 217.9 & Operational Tests Generally

The railroads request that FRA temporarily suspend the requirements to conduct operational tests and inspections of employees under § 217.9, and correspondingly where required under 49 C.F.R. Parts 214, 218, 220, 236, 239, 240 and 242. The railroads also request temporary relief from the related administrative recordkeeping and review procedures in § 217.9.

This relief during the COVID-19 emergency would allow railroad managers’ more time to ensure railroads remain operational when addressing challenges that will arise in other areas due to potential workforce shortages. Such relief would also assist in minimizing the impacts of

workforce shortages as railroads attempt to continue to deliver critical goods and materials during this emergency situation.

Safety would not be compromised under this temporary request for relief, as railroads would still address any observed operating (and safety) rules violations as required under individual railroad policies. Further, employees would still be required to report any safety hazards to railroads as also required under applicable railroad policies.

49 CFR Part 218 - Utility Employees

To address workforce shortages during the COVID-19 emergency, the railroads request FRA provide relief from current restrictions imposed on utility employees by § 218.22(c)(5). Currently, a utility employee is restricted by § 218.22 to basic car or train preparations tasks (e.g., coupling air hoses), but is subject to blue signal protection requirements for additional tasks (while train and yard crew members on the crew the utility employee is attached to are not). The railroads request relief to permit utility employees to perform the same tasks that the train and yard crew members can perform. This relief would allow the utility employee to communicate and work directly with the train crew and perform additional tasks without requiring the establishment of separate blue signal protection. Utility employees attach themselves to and work as a member of the train crew, and should not be restricted to performing lesser or different tasks than train crew members can perform. The existing requirements in Part 218 that a utility employee become a part of the train crew will ensure proper communication and protection via the locomotive engineer at the controls of the train. This relief will aid in expediting mainline and yard failures and reduce employee injury exposure during periods where railroads may have a limited workforce available due to the COVID-19 pandemic. Railroads would limit the relief granted under this section to one utility employee per train or yard crew.

49 C.F.R. Part 219 – Drug and Alcohol Testing

The railroads requests relief from the requirements in Subpart G of Part 219 governing random alcohol and drug tests. The availability of the railroad workforce will be significantly impacted during the COVID-19 emergency. Random drug and alcohol testing exposes employees to the general public through either required clinical visits or via contact with individual collectors of on-site service providers. Such random tests also require employees to enter terminal facilities or clinic buildings where a large number of people may be present. Random testing also puts additional time constraints that are unrelated to carrying out operational duties on the railroad workforce, which will be diminished by instances of quarantine and illness during the COVID-19 outbreak. This emergency situation has also impacted the availability of collectors to even conduct such random tests, and testing clinics may be temporarily closed due to the COVID-19 pandemic. The railroads are also requesting that the existing time-limit requirements for post-accident, reasonable cause, and reasonable suspicion drug and alcohol testing be adjusted to 12 hours. The request corresponds with concerns on collector availability during the COVID-19 crisis and is in alignment with concerns regarding hours of service constraints.

49 C.F.R. Part 228 – Quick Tie-Up

The railroads seek relief from the “quick tie-up” provisions in 49 C.F.R. §§ 228.5 and 228.203(a)(1)(ii). These provisions limit the use of a quick tie-up to certain circumstances. In an effort to increase social distancing and reduce use of common high-touch surfaces (*e.g.*, computer terminal keyboards), the railroads request that employees be able to perform a quick tie-up whenever possible. The employees will certify their records upon their next duty tour rather than after they finish their current duty tour. Train crews have to report to a terminal facility at the start of the duty tour to obtain necessary paperwork, and in many cases, to conduct a job safety briefing about the work to be performed. In some cases, the only task that requires crews to re-enter the facility at the end of an on-duty period is to tie-up at a computer terminal. Thus, this relief would reduce the need to work at a computer in a terminal facility from two times per shift to one time per shift in many instances and would reduce terminal computer and other high touch point surfaces by half. By not requiring employees to re-enter a terminal facility at the end of on-duty period, employees avoid unnecessary social interactions with other employees from different shifts/jobs in a terminal facility.

49 C.F.R. Part 229 – Interval-Based Inspection and Maintenance Requirements

Part 229 contains periodic and time-based intervals addressing locomotive maintenance and inspection requirements. Mechanical staffing levels will be significantly affected during this COVID-19 emergency as fewer employees become available to perform mechanical duties due to quarantine and illness. Without sufficient mechanical staff, completion of all existing requirements under existing intervals specified by Part 229 may not be possible. Therefore, the railroads request that FRA permit the railroads to move locomotives between facilities where the locomotives have not had inspections and tests within the time periods specified in §§ 229.21, 229.23.23, 229.25, 229.27 & 229.29. This relief would allow better utilization of the workforce to address safety-critical needs should resources be excessively reduced during the COVID-19 crisis. The railroads would implement a plan to identify any affected locomotives and develop a plan to return to those locomotives to required service intervals after this temporary relief expires.

49 C.F.R. Part 232 and Other Mechanical Requirements

In parallel with the discussion of Part 213 above, the railroads request relief from various mechanical requirements of Part 232 during the COVID-19 outbreak. Staffing levels will be significantly affected during this COVID-19 emergency as fewer employees become available to perform mechanical inspections and other duties due to quarantine and illness. Without sufficient mechanical staff, completion of all existing requirements under existing intervals timelines specified by Part 232 will likely be impossible. In addition, directives imposed on a geographic location by other government agencies, could lead to significant operational limitations that could result in undue delay to the transportation of critical commodities needed to sustain life during this crisis. Therefore, the railroads request temporary relief from the following provisions:

- § 232.15(a) – The railroads request relief from the requirement in Part 232 governing repairs made at the “nearest available location where necessary repairs can be performed”

to defective locomotives and cars. While railroads will endeavor to repair defective equipment at the locations where qualified mechanical inspectors are usually present, unexpected mark-offs and workforce shortages due to the COVID-19 emergency at some locations may leave railroads without the necessary employees to conduct such repairs. When this occurs, the railroad will move the defective equipment to the nearest forward location where sufficient qualified inspectors are available to make repairs;

- § 232.103(d) – At locations where workforce shortages occur, trains should be allowed to operate with less than 100% operative brakes from a location where a Class 1 brake test is conducted on the train. Under this temporary relief, this percentage would not be reduced to below 95% operative brakes in a train. Tests have proven that operating less than 100% from initial terminal or where a Class 1 test is performed does not compromise safety. In addition, FRA’s regulations recognize that trains can safely operate with less than 100% operative brakes. For example § 232.103(e) enables a train to operate with 85% operable brakes when a train is en route. Under the relief requested here railroads would continue to comply with that existing 85% requirement. As support for this request, FRA enforcement discretion is currently in place for a test train operation on Norfolk Southern and BNSF where five cars have their brakes disabled. These trains are repeatedly dispatched with 95% operable brakes departing their initial terminal and the trains have traversed the entire route for greater than 24 months, without a safety issue;
- § 232.207(a) –The railroads request relief from the requirements of this section that certain trains not be permitted to travel more than 1,000 miles between without requiring an intermediate Class 1A brake inspection (instead requesting such trains be permitted to travel 1,500 miles). Please see the discussion in the section directly below further explaining the relief being requested under this section;
- §§ 232.207 and 232.213 – The railroads request that brake tests performed by a Qualified Mechanical Inspector (“QMI”) allow for trains to temporarily be able to travel up to 2,000 miles between origin and destination. This temporary relief is only requested for those trains, locations, or geographic areas where such relief is needed due to COVID-19. As support for this request, BNSF and Union Pacific have previously operated trains successfully at 2,000 mile intervals under past FRA emergency regulatory relief with no adverse effects on safety. Trains operated under that relief successfully operated from origin to destination daily and intermediate inspections performed on those trains typically identify few to no brake defects. Further, the railroads request that under § 232.213 that extended haul trains may pick up multiple blocks of cars that have been inspected by a Qualified Person (QP”) under Part 232. This request is to account for both mechanical and train crew workforce shortages that will occur during the COVID-19 outbreak. Under this request regarding multiple pick-ups, the railroads would agree that maximum mileage those cars inspected by a QP could travel would be 1,500 miles before a new brake test is required. For clarity, this request for relief from current mileage intervals and event-based inspections require by Part 232 would be situation specific, and is not a blanket relief for all trains in all regions of the country at all times. Rather this request would only apply for specific trains, locations, and geographic areas where

workforce impacts due to COVID-19 necessitate the use of such relief. Limited resources, or directives imposed on a geographic location by other government agencies, may lead to significant operational limitations that could result in undue delay to the transportation of critical commodities needed to sustain life during this crisis. Allowing extending train mileages between mechanical inspections/tests where necessary would significantly aid the railroad industry in maintaining fluid operations during the pandemic;

- §§ 232.205(a)(3) and 232.217(c)(1) – The railroads are requesting off-air time limits be extended to 24 hours, and 48 hours with notification to the appropriate FRA regional office. Data and justification submitted in the current FRA rulemaking proceeding governing time off-air limits show no adverse effects to a train’s braking system as a result of freight cars being off-air for such time periods;
- § 232.215 – The railroads request the ability to operate trains between yards that are 20 miles or less apart, without the need for a transfer train brake test, so long as the brake pipe pressure on the rear car of the train is 75 psi or greater after the train’s brakes are released during a Class III brake test. Waivers granted to the Union Pacific Railroad that have been in effect for several years have allowed for such practice to occur at the international border (with a Class III brake test), and trains have operated under those waivers without incident;
- §§ 232.205 (a)(2)(i)-(ii), 232.205(a)(5)(i)-(ii) and 232.213(a)(5) – In line with the requests made above, and to enable railroads to continue operations during periods of workforce limitations, the railroads request relief from the limits on single block pick-ups and single set-offs in Part 232. The restriction for a single pick-up and set-off for extended haul trains in § 232.213 should be temporarily relieved to allow trains to add or remove more than one single block of cars per location, and generally, within a train. This limitation on set-offs and pick-ups in existing regulation is largely based on considerations only related to test/inspection tracking, and this request for relief does not pose any safety risk with regard to train operations;
- § 215.13 – In parallel with the above requests, the railroads request relief from the requirements governing pre-departure inspections when combining two pre-tested blocks of cars and locomotives (trains). These two trains will have had a Class 1 brake test under § 232.205, Class 1A brake test under § 232.207, or have been designated as extended haul trains in accordance with § 232.213. We request the ability to combine two such trains that may have been operating in a conventional fashion with head-end locomotives only, or with DP-equipped locomotives prior being combined. The railroads also request that just as trains that have had all required tests/inspections would be permitted to be combined under this request, that they also be permitted to be separated into two independent train without redundant inspections then being required;
- §§ 232.303(a)(1)-(2) and 232.305(b)(2) – The railroads request that periodic or condition-based single car air brake testing requirements in § 232.303 should be temporarily waived. Part 232 requires equipment receiving a “major” repair to be treated as being on

a shop or repair track and receive a single car air brake test if not within prescribed limits. FRA considers replacing a wheelset or coupler as being a “major” repair. Using special tools is also a trigger for the repair being considered “major”. Limited employee availability to conduct repairs during the COVID-19 emergency may make compliance with this section extremely difficult. This relief would allow railroads to continue focus on maintaining operations and completing only necessary, safety-critical, tasks. The railroads note that freight car wheels replaced on intermodal ramps do not require time-based single car air brake test as defined in 232.305(b)(2), a further reason FRA should grant temporary relief from the requirements of these sections; and,

- §§ 232.107, 232.217(d), 232.305(b)(2) & (c)-(d), 232.309, and 232.409(d) (periodic inspection and testing generally) – The railroads are requesting temporary relief from the time-based intervals requiring inspection and calibration of certain test devices, air sources, and End-of-Train devices. Railroads utilizing such relief will develop a plan to return any affected equipment to required service intervals after any temporary relief granted expires.

49 C.F.R. Parts 234 & 236 – Interval-Based Inspection & Testing Requirements

The railroads anticipate that during the COVID-19 emergency that staffing levels will be significantly affected as fewer employees become unavailable to perform necessary duties due to quarantine and illnesses. In particular, complying with the various time-dependent requirements in Parts 234 and 236 would be difficult if there was a large reduction in signal staff. Therefore, in parallel with the discussions of Parts 213 and 229 above the railroads request temporary relief from all of the time-interval dependent signal inspection and testing requirements under Parts 234 and 236:

The railroads will still make every good faith effort to comply with these time-dependent requirements and inspections; however, without sufficient signal staff, completion of the requirements under all existing timelines specified by Parts 234 and 236 may not be possible. The requested temporary relief will not compromise the safety of railroad employees or the general public. The safety of operations and the general public will be maintained based on the following considerations:

- All on-track safety and roadway worker requirements under 49 C.F.R. Part 214 not subject to this waiver will still apply;
- All other operating and safety rules not subject to this waiver will still be in effect;
- All Good Faith Challenge policies, (e.g., 49 C.F.R. Parts 214 & 218) will still be in effect;
- Upon a credible report of a Highway/Rail Grade Crossing warning system malfunction, railroads will investigate and initiate efforts to warn highway users and railroad employees in accordance with the requirements of Subpart C of 49 C.F.R. Part 234, including either flagging the crossing or reducing train speeds to 15 mph prior to traversing the crossings; and
- Any reports of malfunctioning signal or crossing systems will still be subject to, and addressed as specified by, the existing requirements of Parts 234 and 236.

49 C.F.R. Parts 240 & 242

First, the railroads are seeking an extension to the existing 60-day deadlines in §§ 240.405(c) and 242.505(c), which require railroads to provide responses to petitions submitted to the Locomotive Engineer Review Board (“LERB”) and the Operating Crew Review Board (“OCRB”) within 60 days of the date of notification.

Due to the uncertainty of staff availability during COVID-19 emergency; and, the consequent impact of gathering additional relevant information and drafting a proper response, railroads are requesting the existing 60-day time limit in Parts 240 and 242 be extended to 120 days. This will assist the railroads in properly managing the review process so that pertinent information is safely gathered and submitted to the OCRB and LERB. We request this extension apply to any railroad responses that were due to the Board(s) on or after March 18, 2020.

Next, the railroads request relief from the requirements set forth in 49 CFR §§ 240.231 and 242.301 that locomotive engineers and conductors be qualified on the physical characteristics of the territories over which they operate, subject to the conditions and limitations set forth below. As the COVID-19 outbreak develops, the railroads anticipate impending crew shortages that will affect the continuity of rail operations and the ability of railroads to get needed goods to market. The requested relief is necessary to allow for workforce planning to adjust crews to locations where needed due to COVID-19 quarantine or other mitigation efforts.

The relief sought would waive the requirements of § 240.231 and § 242.301 in operating scenarios where: 1) track speeds are greater than 20 MPH; 2) the movement will exceed 1 mile in distance; and, 3) a pilot is not available (note: this request does not apply to portions of track with a grade of greater than 1% for 3 or more miles). In the following scenarios, individual railroads would be permitted to operate as follows:

- If the locomotive engineer is qualified on the portion of track to be operated over and conductor is not qualified or whose previous qualification on the portion of track has expired, the train may be operated without restriction;
- If neither the locomotive engineer nor conductor is qualified on a portion of track but the train is PTC active/engaged, the train must operate at a speed not to exceed 40 miles per hour with an up-to-date job aid (track chart). Operating at a speed that is lower than the maximum authorized speed allows the locomotive engineer to successfully plan in advance, enabling proper train handling techniques to safely slow and control train speed which subsequently reduces in-train forces. This request would be used only when crew availability begins to deteriorate and other options are less favorable; and,
- If neither the locomotive engineer nor conductor is qualified on a portion of track and the train is not PTC active, the crew must operate at restricted speed with an up-to-date job aid (track chart).

Finally, under Parts 240 and 242, the railroads are requesting temporary relief related to certifications for locomotive engineers and conductors. The railroads request relief from §§ 240.201(c) and 42.105(c) with respect to the amount of time a locomotive engineer or

conductor may continue to perform service. Specifically, the railroads request that FRA extend the current certification of any locomotive engineer or conductor whose certification is set to expire between March 16, 2020 and December 31, 2020 for an additional six months, allowing affected crewmembers to perform service for up to 42 months total.²

This relief will allow railroads to better comply with guidance from the CDC. Railroads have suspended classroom training and testing programs along with other programs requiring gatherings of people or interstate travel. Additionally, some railroads host aspects of their training and recertification program on the campuses of public educational institutions, which have already closed due to the progressing outbreak. The expiration of crewmember certifications would further exacerbate anticipated manpower shortages resulting from the outbreak and hamper the ability of railroads to transport needed goods across the country.

While railroads are hopeful that standard training and re-certification activities will resume prior to December 31, 2020, they will have to progress the re-certification of affected crewmembers alongside the re-certification of crewmembers whose certifications will be due for renewal after the time members can re-open their facilities. Accordingly, the railroads seek a time window large enough to allow its members to manage the surge of required re-certification activities without making a subsequent request to FRA for additional time.

In order to achieve the ultimate intended effect of this request for relief, FRA will also need to preliminarily grant a 180-day extension to the certification criteria timelines set forth in the following sections of Parts 240 and 242:

- § 240.125; § 242.121 – Knowledge Exam
- § 240.127 – Skills Performance Examination
- § 240.129 – Criteria for Monitoring Operational Performance of Certified Engineers
- § 242.123 – Monitoring for Operational Performance
- § 240.121; § 242.117 – Vision and Acuity
- § 240.123(b); § 242.119(l) – Continuing Education
- § 240.115; § 242.111 – Prior conduct as a motor vehicle operator
- § 240.217; § 242.401 – Time limitations for making determinations

With respect to these criteria, the railroads additionally request that any affected crewmembers who have already accomplished these certification events during the six months preceding the date of this emergency waiver request be excused from having to complete them again in order to re-certify.

Additionally, the railroads request temporary relief from the requirements set forth in §§ 240.223 and 242.209 that require conductors and locomotive engineers possess a physical certificate for all employees who may require a new or replacement certificate between March 19, 2020 and December 31, 2020. This relief will ultimately benefit railroad employee safety, as otherwise railroad personnel who are otherwise teleworking will need to report to their work locations to

² The railroads are aware of the existing 60-day time limit for emergency relief granted under 49 C.F.R. § 211.45(j)(3). However, to recognizing the uncertain duration of the COVID-19 crisis, The railroads similarly seeks a waiver from that 60-day requirement .

physically print and mail certificates. Railroads' internal certification tracking will ensure that employees who are not certified are not called for service or otherwise perform work for which certification is necessary.

Recurrent/Refresher Training Generally

In order to comply with COVID-19 directives and to protect the health and safety of their employees and the public, railroads have suspended classroom training and testing programs along with other programs requiring gatherings of people or interstate travel. As such, and in parallel with the discussion of the request for relief under Parts 240 and 242 above, the railroads request that any recurrent training requirements in the federal railroad safety regulations that are currently due to be fulfilled be suspended during the pendency of the COVID-19 crisis and that when the crisis ends, the railroads be given time to reinstitute recurrent training in an organized manner. Examples of such recurrent training requirements and frequencies are found in 49 C.F.R. §§ 217.11, 213.343, and 232.203(b)(8) and in Part 243 generally. In order to protect railroad employees and the public, the railroads request temporary relief from all recurrent training requirements that became due after March 1, 2020.

Relief is requested for the items discussed above for a period of at least 60 days, and so long as the declared national emergency remains in effect and while normal railroad operations and staffing levels are restored. As discussed above, the railroads recognize there is an existing 60-day time limitation for relief granted under § 211.45. However, in light of the uncertain duration of the continuing COVID-19 outbreak that necessitated the President's emergency declaration, we request that FRA waive that existing time limit.

Where workforce levels remain adequate the railroads intend to operate as normal under existing FRA railroad safety regulations, with the exception of such requests that are for purposes of social distancing efforts (*e.g.*, relief under § 217.9, Part 219, Part 228, and training/certification matters). The railroads to which relief is granted under this petition only intend to use such relief when workforce shortages and other impacts of the COVID-19 outbreaks necessitate such use.

Thank you for your consideration in this matter, and please contact us if you require any further information.

Respectfully submitted,



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APPENDIX

AAR Member Railroads:

Alaska Railroad
Railroads owned by Anacostia Rail Holdings Company
BNSF Railway Company
Canadian National Railway: US operations
Canadian Pacific Railway: US operations
CSX Transportation, Inc.
Florida East Coast Railway Corp.
Railroads owned by R.J. Corman Railroad Group
Railroads owned by Genesee & Wyoming Inc.
Indiana Rail Road Company
Iowa Interstate Railroad Ltd.
Kansas City Southern Railway Company
METRA
National Railroad Passenger Corporation (Amtrak)
Norfolk Southern Railway Company
Pan Am Railways
Union Pacific Railroad
Vermont Railway
Railroads owned by WATCO Companies
Wheeling & Lake Erie Railway Company

ASLRRRA Member Railroads:

See attached spreadsheet

APTA Member Railroads:

Alaska Railroad Company
Caltrain
Capital Metropolitan Transportation Authority
Coaster (NCTD)
Connecticut DOT
Dallas Area Rapid Transit (DART) for TRE
Denton County Transportation Authority (DCTA)
Long Island Rail Road (LIRR)
Maryland Transit Administration (MARC)
Massachusetts Bay Transportation Authority (MBTA)
Northeast Illinois Regional Commuter Railroad Corporation
(Metra)
Metrolink (SCRRA)

Metro-North Commuter Railroad (MNR)
Music City Star (NERR)
New Jersey Transit Corporation (NJT)
New Mexico Department of Transportation (Railrunner Express)
Northern Indiana Commuter Transit District (NICTD)
Metro Transit (Northstar Commuter Rail)
Port Authority Trans Hudson (PATH)
Regional Transportation District Denver
Sonoma Marin Area Rail Transit (SMART)
Sound Transit
Southeastern Pennsylvania Transportation Authority
Trinity Metro (TEXRail)
TriMet (WES Commuter Rail)
South Florida Regional Transportation Authority (SFRTA)
Utah Transit Authority
Virginia Railway Express