



November 2, 2012

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

RE: FRA-2011-0060, Notice 1

Dear Docket Clerk:

On behalf of the more than 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comments on the Federal Railroad Administration's (FRA) Notice of Proposed Rulemaking concerning the System Safety Program (SSP) published September 7, 2012, at 77 FR 55372.

About APTA

APTA is a non-profit international trade association of 1,500 public and private member organizations, including public transit systems; high-speed rail agencies; planning, design, construction and finance firms; product and service providers; academic institutions; and state associations and departments of transportation. More than ninety percent of Americans who use public transportation are served by APTA member transit systems.

Request for Extension of the Comment Period

The devastation occasioned by Hurricane Sandy has severely impacted some of the largest passenger railroads in the nation. These railroads, dedicated to recovering from the storm and restoring service, are not reasonably able to divert the resources necessary to providing FRA with thoughtful, reasoned comment on this matter, whether individually or through their representative organizations.

We believe it is in the best interests of the railroads, FRA, and the rulemaking process to extend the comment period to allow these railroads time to recover and once again turn their attention to this extremely important matter.

APTA proposes the comment period be extended by ten business days, to Tuesday, November 20, 2012, to facilitate participation by these railroads.

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We appreciate FRA's consideration of this request and urge you to grant the extension quickly to allow the railroads to fully concentrate on recovery operations. For additional information, please contact James LaRusch, APTA's chief counsel and vice president corporate affairs, at (202) 496-4808 or jlarsch@apta.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael P. Melaniphy".

Michael P. Melaniphy
President & CEO

MPM/JPL/rk