

**DEPARTMENT OF TRANSPORTATION
FEDERAL RAILROAD ADMINISTRATION**

**DOCKET NO. FRA-2025-1149
IS TECHNOLOGY SOLUTIONS
PETITION FOR SPECIAL APPROVAL OF AN ALTERNATIVE STANDARD
OF COMPLIANCE WITH 49 CFR 238.311, SINGLE-CAR TEST**

**COMMENT OF
THE ASSOCIATION OF AMERICAN RAILROADS AND
THE AMERICAN SHORT LINE AND REGIONAL RAILROAD ASSOCIATION**

The Association of American Railroads (AAR) and the American Short Line and Regional Railroad Association (ASLRRA) (jointly, the Associations), on behalf of themselves and their member railroads, submit the following comments in support of IS Technology Solutions' (IS Tech's) request for a Special Approval of Alternative Standard, which was noticed in the Federal Register on March 31, 2026.¹

AAR is a trade association whose membership includes freight railroads that operate 83% of the line-haul mileage, employ 95% of the workers, and account for 97% of the freight revenues of all railroads in the United States; and passenger railroads that operate intercity passenger trains and provide commuter rail service. ASLRRA is a national trade association representing the interests of about 600 short line and regional railroad members in legislative and regulatory matters. Short lines operate 47,500 miles of track in the United States, or approximately 29% of the national freight network. The Associations represent members that are subject to the requirements of § 238.311.

¹ 91 Fed. Reg. 16080.

IS Tech submitted a petition for special approval of an alternative standard concerning single-car air brake test requirements for passenger equipment, as contained in 49 CFR Part 238 – Passenger Equipment Safety standards. Per the Federal Register notice, IS Tech is seeking a special approval to use an Automated Single-car Test Device (ASCTD) in lieu of a Manual Single-car Test Device (MSCTD) as an alternate standard for compliance with § 238.311, Single-car Test. IS Tech is also proposing to calibrate the ASCTD on an annual basis, rather than the required 92 days.

The rail industry has done significant work to develop and apply standards that allow for the use of ASCTDs to facilitate safe and efficient railroad operations. AAR developed “S-4027 Automated Single-Car Test Equipment, Conventional Brake Equipment—Design and Performance Requirements,” to ensure that ASCTDs have uniform performance regardless of who manufactures the device. In its petition, IS Tech indicates that its ASCTD is based on AAR’s Standard S-4027 for the testing of freight cars. IS Tech’s request for annual calibration is consistent with the Standard S-4027, which explicitly states that annual calibration should be completed “as instructed by the ASCTD manufacturer’s instructions.” The Federal Register notice indicates that the IS Tech ASCTD also includes additional hardware, functionalities, and programming for use in the testing of passenger car brake systems that would help to ensure effective braking on passenger equipment. IS Tech additionally notes that the ASCTD “is more accurate, foolproof, more efficient and accountable due to its audit trail,” which results in a better single-car test and a safer braking system.

The FRA's brake systems subject matter expert sits on AAR's Brake Systems Committee and is knowledgeable of the safety improvements inherent in advancing single-car brake testing via an ASCTD as stipulated by AAR's Standard S-486 Code of Air Brake System Tests for Freight Equipment—Single-car Test, and Standard S-4027. FRA has codified by reference the 2018 version of Standard S-4027 in § 232.305, which allows railroads to use ASCTDs as an alternative to MSCTDs. This has resulted in significant improvements to brake system performance and reliability for freight rail operations. Because of this, the AAR now requires all conventional freight cars to receive a 4-pressure automated single-car test and no longer allows the use of an MSCTD for conventional brake equipment used in interchange service.

Approval of this petition would increase safety outcomes while reducing unnecessary regulatory burden, supporting continued compliance, innovation, and efficient service by railroads that operate modern passenger equipment. Welcoming the advancements in safety, reliability, and efficiency that technology has enabled, the Associations are fully supportive of an ASCTD, as proposed by IS Tech, for passenger equipment. The Associations are also supportive of ASCTD calibration on an annual basis, as proposed in IS Tech's petition.

For these reasons, the Associations respectfully encourage FRA to grant the requested special approval. Thank you for the opportunity to comment.

Respectfully submitted,



Stephen N. Gordon
Associate General Counsel – Safety
Association of American Railroads
425 3rd Street, SW, Suite 1000
Washington, DC 20024



Sarah Yurasko
General Counsel
Association of American Railroads
50 F Street NW, Suite 500
Washington, DC 20001

April 30, 2026