

**DEPARTMENT OF TRANSPORTATION
FEDERAL RAILROAD ADMINISTRATION**

**DOCKET NO. FRA-2025-0124
RETIRING FORM FRA F 6180.107 AND
FORM FRA F 6180.150**

**COMMENTS 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 the Federal Railroad Administration's (FRA's) July 1, 2025, Notice of Proposed Rulemaking (NPRM), which proposes to retire Form FRA F 6180.107, "Alternative Record for Illnesses Claimed to be Work-Related" (Form 6180.107), and Form FRA F 6180.150, "Highway User Injury Inquiry Form" (Form 6180.150). The proposed rule would also change the record retention period required under FRA's accident reporting regulations and make other technical corrections.¹

Statement of Interest

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

¹ "Retiring Form FRA F 6180.107 and Form FRA F 6180.150," Proposed Rule, 90 Fed. Reg. 28,651 (July 1, 2025).

and regulatory matters. Short lines operate 47,500 miles of track in the United States, or approximately 29% of the national freight network. The members of the Associations will be directly affected by the proposed changes because they must comply with the requirements of part 225.

Retiring Form FRA F 6180.107 will reduce redundancy.

FRA originally created Form FRA F 6180.107 because the agency thought it would promote better accounting of contested illness claims, provide an appropriate audit trail, and “result in a body of information that can be used in the future for research into the causes of prevalent illnesses.”² As the agency has noted in the preamble, two decades later, the desired benefits of this form have not come to fruition as railroads rarely use this form. Furthermore, § 225.21(h) already allows railroads to use alternative designed forms, in lieu of Form 6180.98, to record accountable injuries and illnesses. Form 6180.107 is rarely used and has not achieved its desired goals.³

Retiring Form FRA F 6180.150 will eliminate an unnecessary administrative burden.

Railroads are required to send Form 6180.150 to every potentially injured highway user in a highway-rail grade crossing accident. The agency explains in the preamble that the form was designed to assist railroads in making determinations about whether a highway user incurred an injury that must be reported to FRA. However, as is the case with Form 6180.107, Form 6180.150's intended goals have not been attained. FRA estimates that railroads receive responses from approximately 1% of highway users that are sent this form. The Associations

² 67 FR 63022, 63031 (Oct. 9, 2002).

³ 90 Fed. Reg. 28,651 at 28,652.

have also been advised by their member railroads that they very rarely, if ever, receive a response from a highway user who has been sent the form. Retiring FRA Form 6180.150 will reduce the paperwork and administrative burden, without any corresponding safety benefit, on the railroads.

**The NPRM is consistent with the deregulatory agenda of the
President and the Secretary of Transportation.**

Executive Order (E.O.) 14192, “Unleashing Prosperity Through Deregulation” states that it is the policy of the President “to significantly reduce the private expenditures required to comply with Federal regulations.”⁴ Consistent with that policy, E.O. 14219, “Ensuring Lawful Governance and Implementing the President’s ‘Department of Government Efficiency’ Deregulatory Initiative,” directs agencies to rescind regulations that “impose significant costs upon private parties that are not outweighed by public benefits,” “regulations that harm the national interest by significantly and unjustifiably impeding technological innovation,” and “regulations that impose undue burdens on small business and impede private enterprise and entrepreneurship.”⁵ On April 3, 2025, the Office of the Secretary published a Request for Information (RFI) in the Federal Register seeking information to “achieve[] meaningful burden reduction while continuing to meet statutory obligations and ensure the safety of the U.S. transportation system” as part of DOT’s efforts to implement the President’s deregulatory agenda.⁶

⁴ 90 Fed. Reg. 9065 (Jan. 31, 2025).

⁵ 90 Fed. Reg. 10583 (Feb. 19, 2025).

⁶ 90 Fed. Reg. 14593.

The proposed rule achieves the goal of reducing administrative burden upon the railroads by retiring two forms that do not achieve their desired goals. FRA shares in the preamble that both forms do not produce any safety benefits and are redundant or create an unnecessary administrative burden. For these reasons, the Associations support the NPRM and recommend that FRA issue a final rule incorporating the proposed changes to Part 225.

Respectfully submitted,



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