

BEFORE THE
FEDERAL RAILROAD ADMINISTRATION

DOCKET NO. FRA-2025-0130:
AMENDMENTS TO BRAKE SYSTEM MAINTENANCE AND INSPECTION
REQUIREMENTS

COMMENTS OF
THE AMERICAN SHORT LINE AND REGIONAL RAILROAD ASSOCIATION

The American Short Line and Regional Railroad Association (“ASLRRA”), on behalf of itself and its member railroads, submits the following supplemental comments in response to the Federal Railroad Administration (“FRA”)’s July 1, 2025, Notice of Proposed Rulemaking (“NPRM”), which proposes to amend its mechanical equipment safety standards related to brake inspections for passenger and freight rail equipment.¹

ASLRRA is a non-profit trade association representing the interests of the nation’s approximately 600 Class II and Class III (short line) railroads. Short lines operate 47,500 miles of track, or approximately 29% of the national freight network, and employ approximately 18,000 people, thereby playing a vital role in the railroad industry’s strong safety record. The overwhelming majority of short line railroads are considered small businesses by both the Small Business Administration (“SBA”) and FRA’s Policy Statement Concerning Small Entities.²

¹ “Amendments to Brake System Maintenance and Inspection Requirements,” Proposed Rule, 90 Fed. Reg. 28,660 (July 1, 2025).

² See 13 C.F.R. § 121.201 and North American Industry Classification System code 482112, “Short Line Railroad,” and 49 C.F.R. Part 209, Appendix C.

These small businesses succeed in a competitive environment because of their flexibility, cost control, and customer-driven service.

In this NPRM, FRA's proposed changes focus on the incorporation of longstanding waivers for locomotive brake system maintenance and inspection requirements. The amendments are consistent with the mandates of the Infrastructure Investment and Jobs Act, which require FRA to review and analyze certain longstanding waivers to determine whether incorporating the waivers into FRA's regulations is justified, and the Executive Order for Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative.

ASLRRA agrees that the proposed changes are 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." 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."

ASLRRA and its member railroads support the changes proposed in this NPRM. Short lines railroads have shared with ASLRRA that the proposed changes clarify existing requirements and reduce uncertainty. The proposed changes also provide cost savings to

railroads by eliminating the need to submit waiver applications for what have become safe, efficient, industry standards.

Respectfully submitted,

A handwritten signature in black ink that reads "Sarah Yurasko". The signature is written in a cursive, flowing style.

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