

BEFORE THE  
FEDERAL RAILROAD ADMINISTRATION

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DOCKET NO. FRA–2025–0126:  
EXPANDING CERTAIN LOCOMOTIVE WHEEL SET DIAMETER VARIATIONS

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COMMENTS OF  
THE AMERICAN SHORT LINE AND REGIONAL RAILROAD ASSOCIATION

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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 locomotive safety regulations to expand the maximum permitted variation in diameter for locomotive wheel sets using alternating current (“AC”) technology.<sup>1</sup>

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.<sup>2</sup>

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<sup>1</sup> “Expanding Certain Locomotive Wheel Set Diameter Variations,” Proposed Rule, 90 Fed. Reg. 28,658 (July 1, 2025).

<sup>2</sup> 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 proposes to amend paragraph (b) of 49 C.F.R. § 229.73 to expand the maximum permitted variation in diameter for locomotive wheel sets using alternating current AC technology. In May 2019, Union Pacific Railroad submitted a petition for rulemaking under 49 CFR part 209 on the basis that “[n]ew technology with individual axle control developed and placed in service after 1980 provides the basis for change which will result in better customer service through a reduction of locomotive out of service time and increased wheel life without impacting safety.”<sup>3</sup>

Existing paragraph (b) of § 229.73 specifies that the maximum variation in the diameter between any two wheel sets on different trucks on a locomotive that has three-powered-axle trucks may not exceed 1 1/4 inches. In the NPRM, FRA proposes to separate the existing requirement in current paragraph (b) into new paragraphs (b)(1)(i) and (b)(1)(ii), generally continuing the current 1 1/4 inch maximum variation for wheel sets on older locomotives equipped with DC traction motors. FRA proposes to add a new paragraph (b)(2)(i), generally allowing a 1 1/2 inch maximum variation for wheel sets on newer locomotives equipped with AC traction motors that utilize single axle control. In the preamble, FRA explains that this proposed new paragraph (b)(2)(ii) would eliminate the wheel set variation requirement of this section for wheel sets on non-powered axles on locomotives equipped with AC traction motors that utilize single axle control because FRA does not expect wheel variation to have a significant impact on truck dynamics in that case.

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<sup>3</sup> See Docket No. FRA-2025-0126 on <https://www.regulations.gov>.

ASLRRA supports this proposed change and agrees that it 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.” 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.”

Short lines railroads have shared with ASLRRA that the regulatory change would save a tremendous amount of time and additional wheel cuts on 24-wheel sets in the industry’s new fleets of AC traction systems. ASLRRA agrees with FRA that this proposal would better accommodate new technology while maintaining current levels of safety.

Respectfully submitted,

A handwritten signature in cursive script that reads "Sarah Yurasko".

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September 2, 2025