



U.S. Department
of Transportation

**Federal Railroad
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

JUL 17 2015

Mr. Howard Shelanski
Administrator, Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Dear Administrator Shelanski:

The statutory deadline for positive train control (PTC) system implementation is December 31, 2015, less than 6 months away. Congress and FRA are concerned that many of the railroads required to implement PTC will not make the statutory deadline. To date, the vast majority of railroads have neither submitted a PTC Safety Plan (PTCSP) as required under 49 C.F.R. §§ 236.1009 and 236.1015, which is necessary to achieve PTC System Certification and operate in revenue service, nor a request for testing approval to support a PTCSP as required under 49 C.F.R. § 236.1035. Many railroads have also admitted that they will not timely complete implementation.

So Congress and FRA may better understand the status of each railroad's implementation efforts, FRA is seeking information, with periodic updates, under its investigative authority pursuant to 49 U.S.C. §§ 20103, 20107, and 20902, and 49 C.F.R. § 236.1009(h). The railroads' responses will help inform FRA of the current PTC implementation status across all affected railroads and identify any issues causing delay towards full PTC implementation and inform FRA's enforcement strategy. While the information sought relates primarily to regulatory compliance, and is authorized by statute and regulation, FRA is seeking OMB approval in an abundance of caution.

Accordingly, and pursuant to the Paperwork Reduction Act of 1995 and its implementing regulations at 5 C.F.R. § 1320.13, *Emergency Processing*, FRA is requesting emergency processing for this collection of information. FRA cannot reasonably comply with normal clearance procedures because the use of normal clearance procedures is reasonably likely to disrupt the collection of information. Although the statutory deadline for PTC implementation is December 31, 2015, the majority of the railroads have failed to provide the required planning documents and information for system certification within the timeframe FRA previously identified to provide for timely review and approval. FRA cannot wait the normal 90- to 180-day period for routine Office of Management and Budget (OMB) review and approval. Upon approval, FRA will begin requesting regular reports from each pertinent railroad to identify its current PTC implementation status. FRA is, therefore, requesting OMB approval of this collection of information as soon as possible.

Upon OMB approval of its emergency clearance request, FRA will follow the normal clearance procedures for this information collection.

Sincerely,

A handwritten signature in black ink, reading "Melissa L. Porter". The signature is written in a cursive style with a large, stylized initial "M".

Melissa L. Porter
Chief Counsel

Federal Railroad Administration

Information Collection from Railroads

Regarding PTC System Implementation

- 1) Total number of fully mission capable¹ PTC equipped locomotives² required to be implemented under the regulations:
- 2) Current number of fully mission capable PTC equipped locomotives completely implemented under the regulations:
- 3) Total number of fully mission capable PTC equipped track segments³ required to be implemented under the regulations:
- 4) Current number of fully mission capable PTC equipped track segments completely implemented under the regulations:
- 5) Total number of personnel⁴ required under the regulations to be trained on PTC system operations and regulations:
- 6) Current number of personnel who have completed training on PTC system operations and regulations under the regulations:
- 7) Does your railroad have all of the necessary spectrum required to fully implement its PTC system under the regulations?
- 8) Total number of communications towers to support PTC system communications required to be implemented under the regulations:
- 9) Current number of constructed and operational communications towers available to support PTC system communications and required to be implemented under the regulations:
- 10) If you are a host railroad,⁵ are all your tenant railroads fully interoperable with your PTC systems under the regulations?
- 11) Where you are a tenant railroad,⁶ are you fully interoperable with each host railroad's PTC system under the regulations?
- 12) The date a PTC Safety Plan has or will be submitted to FRA:

¹ For the purposes of this survey, "mission capable" means a system in which all equipment installations are complete, tested, have no faults that preclude its use, and are on-hand and able to fully operate as designed to perform the entire mission. To be considered fully mission capable, the component or system need not yet have received PTC System Certification.

² A fully mission capable PTC equipped locomotive is a locomotive in which all onboard systems and equipment installations are complete, tested, and have all mission-essential subsystems installed and operating as designed. A fully mission capable PTC locomotive and similar vehicle has no faults that preclude its use, and the equipment is on-hand and able to operate as a lead locomotive vehicle with the onboard PTC system fully functional.

³ A fully mission capable PTC equipped track segment is a track segment in which all wayside interface units, supporting signal systems (if applicable), communications equipment, integrated hazard detectors (if applicable), highway grade crossing systems, switch point monitor systems, and other associated equipment installations are complete, tested, and have all mission-essential subsystems installed and operating as designed. A fully mission capable track segment has no faults that preclude its use, and the equipment is on-hand and fully functional and is capable of interacting with onboard and office subsystems.

⁴ As indicated in 49 CFR §§ 236.1041-236.1049, personnel requiring training include: (1) Persons who install, maintain, repair, modify, inspect, and test PTC systems; (2) Persons who dispatch train operations; (3) Persons who operate trains or serve as a train or engine crew member; (4) Roadway workers; (5) Direct supervisors of persons listed in (1) through (4).

⁵ Host railroad means a railroad that has effective operating control over a segment of track.

⁶ Tenant railroad means a railroad, other than a host railroad, operating on track upon which a PTC system is required.

13) With 1 being considered most challenging and 7 being considered least challenging, please rank in order the following in terms of the difficulty implementing PTC. Please do not reuse any numbers and, for those items that are not applicable, respond with NA:

- Equipping locomotives
- Equipping track segments
- Training railroad personnel
- Obtaining all necessary spectrum
- Acquiring approval for and the construction of communications towers
- Achieving necessary interoperability
- Drafting and submitting safety plans

14) If there are any additional comments you would like to provide to FRA regarding PTC implementation, please do so below: