

**1FEDERAL RAILROAD ADMINISTRATION  
PASSENGER TRAIN EMERGENCY SYSTEMS  
(Title 49 Code of Federal Regulations Part 238)  
SUPPORTING JUSTIFICATION  
OMB Control No. 2130-0576**

Summary

- This submission is a request for an extension with change of the last three-year approval granted by the Office of Management and Budget (OMB) on May 17, 2017, which now expires on May 31, 2020.
- FRA published the required 60-day *Federal Register* Notice on March 16, 2020. See 85 FR 15020. FRA received no comments in response to this Notice.
- The total number of burden hours requested for this information collection is 859 hours. The total number of burden hours previously approved by OMB was 23,325 hours.
- The total number of responses requested for this information collection is 8,310. The total number of responses previously approved by OMB was 89,780.
- Overall, the adjustments decreased the burden by 22,466 hours and decreased responses by 81,470 after a thorough review of the data.
- The answer to question number 12 itemizes all information collection requirements with each requirement of these rules. (See pages 8-10)
- The answer to question number 15 itemizes all adjustments associated with this rule. (See pages 10-12.)
- There are no **program changes** at this time.

**1. Circumstances that make collection of the information necessary.**

Background

In September of 1994, the Secretary of Transportation (the Secretary) convened a meeting of representatives from all sectors of the rail industry with the goal of enhancing rail safety. As one of the initiatives arising from this Rail Safety Summit, the Secretary announced that DOT would begin developing safety standards for rail passenger equipment over a five-year period. In November of 1994, Congress adopted the Secretary's schedule for implementing rail passenger equipment safety regulations and included it in the Federal Railroad Safety Authorization Act of 1994 (the Act), Pub. L. No. 103-440, 108 Stat. 4619, 4623-4624 (November 2, 1994). Congress also authorized

the Secretary to consult with various organizations involved in passenger train operations for purposes of prescribing and amending these regulations, as well as issuing orders pursuant to them. Section 215 of the Act is codified at 49 U.S.C. 20133. The Secretary of Transportation delegated these rulemaking responsibilities to the Federal Railroad Administrator, see 49 CFR 1.49(m).

On May 4, 1998, pursuant to § 215 of the Act, FRA issued a Passenger Train Emergency Preparedness final rule. See 63 FR 24629. The rule contains minimum Federal safety standards for the preparation, adoption, and implementation of emergency preparedness plans by railroads connected with the operation of passenger trains, including freight railroads hosting the operations of passenger rail service. Elements of the required emergency preparedness plan include: communication, employee training and qualification, joint operations, tunnel safety, liaison with emergency responders, on-board emergency equipment, and passenger safety information. This rule also established specific requirements for passenger train emergency systems, as well as specific requirements for debrief and critique sessions following emergency situations and full-scale simulations.

On May 12, 1999, FRA issued the Passenger Equipment Safety Standards (PESS) final rule. See 64 FR 25540. This rule established comprehensive safety standards for railroad passenger equipment. After publication of the PESS final rule, interested parties filed petitions seeking FRA's reconsideration of certain requirements contained in the rule. These petitions generally related to the following subject areas: structural design; fire safety; training; inspection, testing, and maintenance; and movement of defective equipment. To address the petitions, FRA grouped issues together and published three sets of amendments to the final rule in the Federal Register. See 65 FR 41284; 67 FR 19970; and 67 FR 42892.

On February 1, 2008, FRA published a final rule on Passenger Train Emergency Systems addressing emergency communication, emergency egress, and rescue access. This rule expanded the applicability of requirements for public address systems to all passenger cars, for intercom systems, and for emergency responder roof access to all new passenger cars. It also enhanced existing requirements for emergency window exits and established requirements for rescue access windows used by emergency responders. See 73 FR 6370.

In its final rule issued on November 29, 2013, FRA added requirements for emergency passage through vestibule and other interior passageway doors and enhanced emergency egress and rescue signage requirements. See 78 FR 71785. FRA also established requirements for low-location emergency exit path markings to assist occupants in reaching and operating emergency exits, particularly under conditions of limited visibility. Moreover, FRA added standards to ensure that emergency lighting systems are provided in all passenger cars and enhanced requirements for the survivability of emergency lighting systems in new passenger cars.

2. **How, by whom, and for what purpose the information is to be used.**

This is an extension with change to a current collection of information entirely associated with FRA's Part 238 rule. The collection of information is used by members of the rail traveling public and by rail train and engine employees to safely and quickly exit passenger train cars in the event of a collision, derailment, fire, or other emergency situation. The collection of information is also used by emergency responders to be able to swiftly locate and understand how to operate passenger car emergency access doors and windows in emergency situations. Quick egress of rail passengers and crew members in an emergency situation and quick ingress (where necessary) by emergency responders can save lives and help to minimize the number and severity of injuries to all parties.

Additionally, the collection of information is used by FRA for regulatory compliance and enforcement purposes. Specifically, the collection of information is used by FRA inspectors to ensure that Tier I and Tier II rail passenger car doors intended for emergency egress are conspicuously and legibly marked on the inside of the car, and legible and understandable instructions are posted at or near each such door as specified in § 238.125. The required marking and instructions enable train crews and passengers to be aware of and to find these critical doors, move toward them in an emergency situation, and operate them to make a quick exit when necessary. FRA inspectors also ensure that all doors intended for access by emergency responders are marked on the exterior of the car with retro-reflective material and have legible and understandable instructions posted at or near each such door. Quick entry by emergency responders into rail passenger cars may mean the difference between life and death for rail passenger and train crews and the difference between few and minor injuries or many and severe injuries to affected rail passengers and train crews.

FRA inspectors also ensure that each removable panel or window in vestibule doors is conspicuously and legibly marked with luminescent material on both the vestibule side of the door and the passenger seating area side of the door, and that legible and understandable operating instructions are posted on both the vestibule and passenger seating area side of the door at each such panel or window. Again, the required markings and instructions are used by train crews and rail travelers to facilitate egress in emergency situations.

The collection of information is used by FRA inspectors to ensure that new Tier I passenger cars ordered on or after April 1, 2008, or placed in service on or after April 1, 2010, and all Tier II passenger cars, are equipped with a Public Address (PA) system that has legible and understandable operating instructions posted at or near each such intercom and that the location of each such intercom is conspicuously marked with luminescent material, as specified under § 238.125. The posting of the required instructions enables two-way communications between train crew members and

passengers in an emergency and provides a means for a train crew member to communicate by voice to passengers of his or her train in an emergency situation.

The collection of information is also be used by train passengers to: (1) recognize and immediately report potential emergencies to crewmembers; (2) recognize hazards; (3) recognize and know how and when to operate appropriate emergency-related features and equipment, such as fire extinguishers, train doors, and emergency exits; (4) recognize the potential special needs of fellow passengers during an emergency, such as those of children, the elderly, and disabled persons; and (5) know how to quickly and safety evacuate the train in the event of an emergency, such as a collision, derailment, explosion, fire, or some other unanticipated occurrence.

Luminescent or lighted emergency exit markings are used by passengers and emergency responders to determine where the closest and most accessible emergency exit route is located, as well as how to operate the emergency exit mechanisms.

Windows and doors intended for emergency access by emergency responders for extrication of passengers are marked with retroreflective material so that the emergency responders can easily distinguish them from the less accessible doors and windows. Emergency responders can find these doors and windows by shining flashlights or other portable lighting on the marking or symbol selected by the railroad to make such symbols distinguishable in conditions of poor visibility.

**3. Extent of automated information collection.**

FRA strongly encourages and highly endorses the use of advanced information technology, wherever possible, to reduce burden on respondents. It should be noted that the great majority of responses—and burden—involve markings/instructions of windows and doors. Also, the burden for this collection of information is very minimal.

**4. Efforts to identify duplication.**

The information collection requirements to our knowledge are not duplicated anywhere. Similar data are not available from any other source.

**5. Efforts to minimize the burden on small businesses.**

The “universe” of the entities considered in this analysis generally includes only those small entities that can reasonably expect to be directly regulated by this rule. The types of small entities potentially affected by this rule are small railroads.

“Small entity” is defined in 5 U.S.C. 601 as a small business concern that is independently owned and operated and is not dominant in its field of operation. The U.S. Small Business Administration (SBA) has the authority to regulate issues related to small businesses and stipulates in its size standards that a “small entity” in the railroad industry

is a for profit “line-haul railroad” that has fewer than 1,500 employees, a “short-line railroad” with fewer than 1,500 employees, a “commuter rail system” with annual receipts of less than \$16.5 million dollars, or a contractor that performs support activities for railroads with annual receipts of less than \$16.5 million. Additionally, 5 U.S.C. 601 defines as “small entities” as governments of cities, counties, towns, townships, villages, school districts, or special districts with populations of less than 50,000 or commuter railroads that serve populations of 50,000 or less.

Federal agencies may adopt their own size standards for small entities in consultation with SBA and in conjunction with public comment. Pursuant to that authority, FRA has published a final statement of agency policy that formally establishes small entities as being railroads, contractors, and hazardous materials shippers that meet the revenue requirements of a Class III railroad.

For this discussion, there are only two intercity passenger railroads, Amtrak and the Alaska Railroad, neither of which is considered to be a small entity. Amtrak is a Class I railroad and the Alaska Railroad is a Class II railroad. The Alaska Railroad is owned by the State of Alaska, which has a population well in excess of 50,000.

The level of costs incurred by each organization will generally vary in proportion to the size of their passenger car fleet. For instance, railroads with fewer passenger cars have lower overall costs associated with implementing these standards. There are currently 34 commuter railroad operations in the United States. Most commuter railroads are part of larger transportation organizations that receive Federal funds and serve major metropolitan areas with populations greater than 50,000. However, two commuter railroads do not fall in this category and are considered small entities.

The small entity impacted by this regulation is a commuter train operation that provides express service to and from a sporting event approximately seven times per year. A Class III railroad owns and operates the 6 bi-level passenger cars used for this commuter operation. The initial costs associated with completing these upgrades for the railroad were estimated to range between \$14,482 and \$28,694 and were spread over the first two to three years. FRA estimated that this railroad was not significantly impacted since it provides service under contract to a State institution and was able to pass compliance costs on to that institution.

Pursuant to the Regulatory Flexibility Act (5 U.S.C. 605(b)), FRA certified that this rule does not have a significant economic impact on a substantial number of small entities. Although a substantial number of small railroads will be affected by this final rule, none of these entities will be significantly impacted.

## **6. Impact of less frequent collection of information.**

If this information were not collected or collected less frequently, railroad safety might be seriously jeopardized. Specifically, without this collection of information, the traveling

public and train crews might suffer more serious injuries, and possibly death, if they could not quickly determine how to safely and efficiently evacuate a train after an accident/incident occurred. If single-level and multi-level passenger cars, including sleeping cars, did not have the prescribed minimum number of emergency window exits with legible and understandable operating instructions, and if they were not readily accessible, clearly marked, and well-maintained, railroad passengers might not know how and where to exit a passenger car in the event of an emergency such as a collision, derailment, fire, explosion, or other unexpected occurrence. Any delay in speedily exiting such passenger cars could potentially cause numerous injuries and fatalities to the American traveling public.

Also, without this collection of information, passenger cars might not have a sufficient number of clearly marked access windows for rescue workers to evacuate passengers in the event of a train emergency. In the event of an emergency, rescue workers must be able to find these passenger car access windows promptly and must be able to figure out how to open them once they do find them. Rescue workers must be able to find where these rescue access windows are located on both single-level and multi-level passenger cars by means of clearly marked signs/placards that have understandable instructions and that are posted at or near each rescue access window in high-performance photo-luminescent (HPPL) material. Delays caused by being unable to find or quickly open access windows on the part of rescue workers could result in serious injury and death to train crew members and to substantial numbers of railroad passengers.

Without a means of emergency communication, such as the prescribed public address and intercom systems that must be installed within new Tier I and all Tier II passenger cars, train crews could not quickly notify passengers about an emergency and the necessary actions they must take, and railroad passengers and train crews would be unable to talk to one another in such an emergency situation. This could lead to a lack of awareness on the part of the train crew members of a passenger emergency or other serious safety/health problems and a corresponding lack of direction from the train crew to passengers on the proper actions they should immediately take to handle the situation or to ensure their safety. Passengers might panic or take the wrong action(s) if they are unable to receive instructions from the professional train crew members. Passengers need to know when and how they must promptly evacuate a passenger car, or when and what other type of action they must take to ensure their well-being. Train crews must have the capability to communicate urgent and necessary information to them efficiently and clearly.

As with emergency access windows, so too must emergency roof access be provided by means of a hatch or structural weak point in the roof that is a clearly marked so it can be

found and operated by rescue personnel in the event of an emergency. It is imperative that each emergency roof access location be conspicuously marked with HPPL material and that legible and understandable instructions be posted at or near each location. In the event of an emergency that prevents passengers from quickly exiting a car through the access windows, the ability of rescue workers to open the roof access quickly and easily might be the difference between life and death for train crew members and passengers.

**7. Special circumstances.**

All proposed information collection requirements are in compliance with this section.

**8. Compliance with 5 CFR 1320.8.**

As required by the Paperwork Reduction Act of 1995, FRA published a notice in the Federal Register on March 16, 2020, soliciting comment on this particular information collection. See: 85 FR 15020. FRA received no comments pertaining to this collection of information in response to this notice.

**9. Payments or gifts to respondents.**

There are no monetary payments or gifts made to respondents associated with the information collection requirements contained in this regulation.

**10. Assurance of confidentiality.**

The information contained on various report forms is a matter of public record and, therefore, confidentially is not promised to any respondent.

**11. Justification for any questions of a sensitive nature.**

No information of this nature is collected.

**12. Estimate of burden hours for information collected.**

CFR Section	Respondent universe	Total Annual responses	Average time per responses	Total annual burden hours	Total cost equivalent <sup>7</sup>

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<sup>7</sup> The dollar equivalent cost throughout this document is derived from the Surface Transportation Board's Full Year Wage A&B data series using the appropriate employee group hourly wage rate that includes a 75-percent overhead charge.

238.112 – Door emergency egress and rescue access systems – Markings, signage, instructions	34 railroads	2,250 markings/signs/instructions	5 minutes	187.5 hours	\$14,250
(e) – Passenger car exterior doors intended for emergency access by responders marked with retro-reflective material and instructions provided for their use	34 railroads	2,250 exterior door markings	5 minutes	187.5 hours	\$14,250
(f)(5) – Markings and instructions – interior doors/removable panels or windows	34 railroads	1,500 marked panels/windows	5 minutes	125 hours	\$9,500
<i>- Testing of car door removable panels, removable windows, manual override devices, and door retention mechanisms as part of periodic mechanical inspection</i>	<i>This is a continuous and usual and customary practice for railroads. Consequently, there is no burden associated with this requirement</i>				
238.113(d) – Emergency window exits – Markings/and instructions	34 railroads	60 window markings	15 minutes	15 hours	\$1,140
<i>- Periodic testing of representative sample of car emergency exit windows as part of periodic mechanical inspection - Record</i>	<i>This is a continuous and usual and customary practice for railroads. Consequently, there is no burden associated with this requirement</i>				
238.114(d) – Rescue access windows – Markings with retro-reflective material on each exterior car	34 railroads	1,500 access window markings	5 minutes	125 hours	\$9,500
238.121(b) – Emergency communications – Marking of each intercom intended for passenger use on new Tier I & Tier II passenger cars	34 railroads	375 marked intercom locations	5 minutes	31.3 hours	\$2,379
238.123(e) – Marked emergency roof access locations	34 railroads	375 marked emergency roof access locations	30 minutes	187.5 hours	\$14,250
<i>238.303 – Exterior calendar day mechanical inspection of passenger equipment: Replacement of missing, illegible, or inconspicuous markings, signage, &amp; instructions</i>	<i>The burden for this requirement is included under OMB Control Number 2130-0544.</i>				



- Record of Non-complying marking, signage, or instruction	The burden for this requirement is included under OMB Control Number 2130-0544.				
238.305 – Interior calendar day mechanical inspection of passenger cars:	The burden for this requirement is included under OMB Control Number 2130-0544.				
- Written notification to train crew of non-complying condition and posting notice on door of defective condition	The burden for this requirement is included under OMB Control Number 2130-0544.				
- Written notification to train crew of car with non-functioning PA or intercom system	The burden for this requirement is included under OMB Control Number 2130-0544.				
- Record of non-complying condition - RR Written procedure procedures for mitigating hazards of non-complying condition	The burden for this requirement is included under OMB Control Number 2130-0544.				
- Written notification to train crew of non-complying condition	The burden for this requirement is included under OMB Control Number 2130-0544.				
238.307 – Records of inspection, testing, and maintenance of passenger car emergency window exits	The burden for this requirement is included under OMB Control Number 2130-0544.				
- Replacement of missing, illegible, or inconspicuous emergency roof access markings/ instructions on cars	The burden for this requirement is included under OMB Control Number 2130-0544.				
238.311 – Single Car Test: RR Copy of APTA Standard (SS-M-005-98) for RR Head Trainer	The burden for this requirement is included under OMB Control Number 2130-0544.				
- Other RR copies of APTA Standard	The burden for this requirement is included under OMB Control Number 2130-0544.				
Total	34 railroads	8,310	NA	859 hours	\$65,269

**13. Estimate of total annual costs to respondents.**

FRA estimates that railroads will incur costs meet the requirements under section 238.112 associated with marking and posting instructions on emergency egress doors and marking/posting instructions on removable panels in car vestibule doors.

FRA estimates that approximately 7,700 cars will be affected by this requirement. FRA estimates that it will cost \$117.60 per car to complete the marking requirements [(\$5 per sign/markings + (0.25 hours labor x \$58.40 per hour) x 6 signs/markings per car = \$117.60].

TOTAL COST = \$905,491 (7,700 cars x \$117.60)

**14. Estimate of Cost to Federal Government.**

There is no additional cost to the Federal Government (FRA) beyond the normal salaries that it pays its inspectors to do their jobs.

**15. Explanation of program changes and adjustments.**

FRA provided a thorough review of this package and determined many of our initial figures were based on rough estimates. Additionally, we realized some of the estimates were double counted and others were outdated. Moreover, other estimates were not PRA requirements, thus leading to the increased figures, which were decreased accordingly in this submission. Thus, our latest review has refined our estimates to be more accurate. The tables below provide specific information on the review of any that have changed.

This information collection submission reflects a decrease of 22,466 hours from the previously approved submission. The decrease in burden is due solely to adjustments, which are detailed in the table below.

CFR Section	Total Annual Responses			Total Annual Burden Hours			Notes
	Previous Submission	Current Submission	Difference	Previous Submission	Current Submission	Difference	
238.112 – Door emergency egress and rescue access systems: – Markings, signage, instructions	45,804 markings/signs/instructions	2,250 markings/signs/instructions	-43,554 markings/signs/instructions	11,451 hours	188 hours	-11,264 hours	The previous submission for responses, average time per response, and burden hours were outdated and were based on the initial figures published in 78 FR 71786, Nov. 29, 2013. Thus, the current figures represent our latest and best estimates.
(e) – Passenger car exterior doors intended for	30,536 exterior door markings	2,250 exterior door markings	-28,286 exterior door markings	7,634 hours	188 hours	-7,447 hours	For 238.112 & (e): The reduction is due to review of

emergency access by responders marked with retro-reflective material and instructions provided for their use							estimated number of cars that will need to be marked and estimated time to complete each marking. New cars come with markings and FRA estimates majority of these cars are marked according to this regulatory requirement. However, FRA estimates about 5 percent of current fleet of cars as opposed to the initial estimates for the entire fleet will need to be remarked to address maintenance issues, such as, vandalism and environmental conditions. Thus, FRA estimates about 2,250 doors (emergency egress and rescues) and 2,250 exterior doors will be remarked annually and that it will take approximately 5 minutes to properly mark each door.
(f)(5) – Markings and instructions – interior doors/removable panels or windows	1,340 marked panels /windows	1,500 marked panels /windows	160 marked panels /windows	335 hours	125 hours	-210 hours	<p>The amount of time per marking was reduced from 15 minutes to 5 minutes for 238.112 &amp; (e) because FRA had previously overestimated the burden. In the new estimate, FRA is assuming that railroads will use pre-made markings and instruction decals instead of creating (cutting) new decals. These new off the shelf decals are easier to apply and remove. The previous estimate also</p>

							included the amount of time it took to move or reposition the train, which should not have been included because the stickers can be applied without having to move the train.
-Testing of car door removable panels, removable windows, manual override devices & door retention mechanisms as part of periodic mechanical inspection	17 tested cars	0 tested cars	-17 tested cars	26 hours	0 hours	-26 hours	Based on FRA's interpretation of the PRA's implementing regulations, specifically the definition of "information" within 5 C.F.R. § 1320.3(h), FRA considers training/testing to be an excepted category of information under the PRA.
238.113(d) – Emergency window exits – Markings/and instructions	662 window markings	60 window markings	-602 window markings	964 hours	15 hours	-949 hours	<p>The previous submission for responses, average time per response, and burden hours were outdated and were based on the initial figures published in 78 FR 71786, Nov. 29, 2013. Thus, the current figures represent our latest and best estimates.</p> <p>The reduction is due to review of estimated number of passenger cars that will need marked with luminescent material on the inside of each car to facilitate egress and estimated time to complete each marking. FRA estimates that 10 cars as opposed to the initial estimate of 143 cars will be remarked due to maintenance issues. FRA estimates about 60 windows will</p>

							<p>be remarked annually and that it will take approximately 5 minutes to properly mark each window.</p> <p>The amount of time per marking was reduced from 15 minutes to 5 minutes because FRA had previously overestimated the burden. In the new estimate, FRA is assuming that railroads will use pre-made markings and instruction decals instead of creating (cutting) new decals. These new off the shelf decals are easier to apply and remove. The previous estimate also included the amount of time it took to move or reposition the train, which should not have been included because the stickers can be applied without having to move the train.</p>
- Periodic Testing of representative sample of car emergency exit windows as part of periodic mechanical inspection - Record	17 tested cars	0 tested cars	-17 tested cars	9 hours	0 hours	-9 hours	Based on FRA's interpretation of the PRA's implementing regulations, specifically the definition of "information" within 5 C.F.R. § 1320.3(h), FRA considers training/testing to be an excepted category of information under the PRA.
238.114(d) – Rescue access windows – Markings with retro-reflective material on each exterior car	1,092 access window markings	1,500 access window markings	408 access window markings	819 hours	125 hours	-694 hours	The reduction in burden hours are due to changes in average time response--from 45 minutes to 5 minutes. FRA had previously overestimated the

							burden. In the new estimate, FRA is assuming that railroads will use pre-made rescue access markings and instruction decals instead of creating (cutting) new decals. These new off the shelf decals are easier to apply and remove. The previous estimate also included the amount of time it took to move or reposition the train, which should not have been included because the stickers can be applied without having to move the train. FRA also had accounted for other items that were not PRA burdens. Moreover, the previous estimates were based on the 2013's estimates and thus the current figures represent our latest and best estimates.
238.121(b) – Emergency communications – Marking of each intercom intended for passenger use on new Tier I & Tier II passenger cars	116 marked intercom locations	375 marked intercom locations	259 marked intercom locations	10 hours	31 hours	21 hours	The increase in burden hours are due to an increase in annual responses. The previous estimates were based on the 2013's estimates and thus the current figures represent our latest and best estimates.
238.123(e) – Marked emergency roof access locations	232 marked emergency roof access locations	375 marked emergency roof access locations	143 marked emergency roof access locations	116 hours	188 hours	72 hours	
238.303 – Exterior calendar day mechanical	150 replacement required	0 replacement required	-150 replacement required	50 hours	0 hours	-50 hours	The burden for this requirement is included under OMB Control Number 2130-0544.

inspection of passenger equipment: Replacement of missing, illegible, or inconspicuous markings, signage & instructions	markings	markings	markings			
- Record of Non-complying marking, signage, or instruction	150 non-compliance records	0 non-compliance records	-150 non-compliance records	5 hours	0 hours	-5 hours
238.305 – Interior calendar day mechanical inspection of passenger cars:	520 notifications	0 notifications	-520 notifications	9 hours	0 hours	-9 hours
- Written notification to train crew of non-complying condition and posting notice on door of defective condition	300 written notifications	0 written notifications	-300 written notifications	5 hours	0 hours	-5 hours
- Written notification to train crew of car with non-functioning PA or intercom system	300 records	0 records	-300 records	10 hours	0 hours	-10 hours
- Record of non-complying condition - RR written procedure procedures for mitigating hazards of non-complying condition	30 written procedures	0 written procedures	-30 written procedures	1,200 hours	0 hours	-1,200 hours
- Written notification to train crew of non-	458 written notifications	0 written notifications	-458 written notifications	15 hours	0 hours	-15 hours

The burden for this requirement is included under OMB Control Number 2130-0544.



complying condition							
238.307 – Records of inspection, testing, and maintenance of passenger car emergency window exits	7,634 inspection and testing records	0 inspection and testing records	-7,634 inspection and testing records	636 hours	0 hours	-636 hours	The burden for this requirement is included under OMB Control Number 2130-0544.
- Replacement of missing, illegible, or inconspicuous emergency roof access markings/ instructions on cars	32 required markings	0 required markings	-32 required markings	11 hours	0 hours	-11 hours	
238.311 – Single Car Test: RR Copy of APTA Standard (SS-M-005-98) for RR Head Trainer	30 APTA copies	0 APTA copies	-30 APTA copies	8 hours	0 hours	-8 hours	The tagging of single car test is covered under OMB Control Number 2130-0544. The APTA document, it is not a requirement.
- Other RR copies of APTA Standard	360 copies (12 copies per RR)	0 copies	-360 copies	12 hours	0 hours	-12 hours	
Total	89,780 responses	8,310 responses	-81,470 responses	23,325 hours	859 hours	-22,466 hours	

**Adjustments** above decreased the burden by *22,466 hours* and decreased the number of responses by *81,470*.

The current OMB agency inventory for this information collection exhibits a total burden of 23,325 hours and 89,780 responses, while the present submission reflects a total burden of 859 hours and 8,310 responses. Hence, there is a total decrease in burden of *22,466 hours* and *81,470 responses*.

The costs to respondents (see question 13) has increased from the previously approved submission by \$119,647. The previous cost to respondents was \$785,844. The current cost to respondents is \$905,491. This is due to an increase in wage rates over time and an increase to the number of locomotives.

**16. Publication of results of data collection.**

FRA plans no publication of this information.

**17. Approval for not displaying the expiration date for OMB approval.**

Once OMB approval is received, FRA will publish the approval number for these information collection requirements in the Federal Register.

**18. Exception to certification statement.**

No exceptions are taken at this time.

Meeting Department of Transportation (DOT) Strategic Goals

In this information collection, as in all its information collection activities, FRA seeks to do its very best to fulfill DOT Strategic Goals and to be an integral part of One DOT.