



**U.S. Department of Transportation  
Federal Railroad Administration**

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**MEETING ON FRA RAILROAD LOCOMOTIVE SAFETY STANDARDS AND EVENT RECORDER OMB #2130-0004, DOCKET NO. FRA-2021-0006**

**Attendees (via teleconference):**

Brenda Moscoso, Assistant Vice President, Safety Policy and Analysis, Association of American Railroads

Joseph St. Peter, Counsel, Association of American Railroads

Steve Clay, Railroad Safety Specialist, Office of Railroad Safety, Federal Railroad Administration

Mark Fuller, Staff Director, Office of Railroad Safety, Federal Railroad Administration

Amanda Maizel, Attorney Adviser, Office of Chief Counsel, Federal Railroad Administration

Hodan Wells, Industry Economist, Office of Railroad Safety, Federal Railroad Administration

**Summary:**

On October 14, 2021, at 9:00 AM ET, Ms. Moscoso and Mr. St. Peter from the Association of American Railroads (AAR) met with staff from the Federal Railroad Administration (FRA) to provide oral comments to the Paperwork Reduction Act (PRA) information collection renewal (ICR) 60-day *Federal Register* notice titled, “Railroad Locomotive Safety Standards and Event Recorder” (60-day notice), Office of Management and Budget (OMB) #2130-0004.

FRA held this teleconference in a manner consistent with U.S. Administrative Procedure Act requirements and the only information that FRA shared on the call was based on public information that could be accessed on FRA’s website, in the 60-day notice, or [reginfo.gov](http://reginfo.gov).

AAR explained its concerns with FRA’s proposed burden estimates, namely that the adjusted estimates were significantly reduced from previous OMB# 2130-0004 ICR packages. AAR questioned how FRA derived these updated estimates and expressed its specific concerns about the updated estimate in 49 CFR 229.21(a)- Daily inspection. AAR discussed that time tests and inspection burdens fall within the scope of the PRA and should not have been removed from the burden estimation. AAR also requested that going forward, FRA highlight the regulatory sections in its 60-day notices in which estimates have been significantly adjusted. AAR believes

that this additional information will allow stakeholders to determine significant estimate adjustments more easily when reviewing FRA's 60-day notices.

FRA thanked AAR for its feedback and encouraged AAR to follow up with written comments further detailing its concerns. FRA also stated that it would review its PRA estimates for this ICR renewal and will address stakeholder comments in the upcoming 30-day notice and supporting materials that will be submitted to OMB.

At 9:29 AM ET, the teleconference adjourned.

cc: Docket No. FRA-2021-0006