

FEDERAL RAILROAD ADMINISTRATION
U.S. DOT Crossing Inventory Form
(Title 49 Code of Federal Regulations Part 234, Subpart F)
1SUPPORTING JUSTIFICATION
OMB No. 2130-0017

Summary of Submission

- This submission is a request for an extension without change (with changes in estimates) of the previous approval granted by the Office of Management and Budget (OMB) on January 24, 2023, with an expiration date on January 31, 2026.
- The Federal Railroad Administration (hereafter “FRA” or the “Agency”) published a required 60-day notice in the Federal Register on September 12, 2025. *See* 90 FR 44286. FRA received no comments in response to this Notice.
- Overall, the adjusted estimates increased the burden by 1,194 hours and decreased responses by 196,613.
- The answer to question number 12 itemizes all information collection requirements.

1. Circumstances that make collection of the information necessary.

On January 6, 2015, FRA published a final rule to fulfill the Congressional mandate required by Section 204(a) of the Rail Safety Improvement Act of 2008 (RSIA) (codified at 49 U.S.C. 20160)¹ (the statute), and under the agency’s general railroad safety rulemaking authority at 49 U.S.C. 20103.² The Statute requires FRA (as the Secretary of Transportation’s delegate)³ to promulgate regulations on Crossing Inventory. Consistent with the statute, this rule required railroads that operate one or more trains through highway-rail grade or pathway crossings to submit initial reports to the Crossing Inventory, including current information about warning devices and signs for previously unreported and new highway-rail and pathway crossings through which they operate. The final rule also requires railroads to periodically update the data in the Crossing Inventory, including the prompt reporting of a crossing sale, crossing closure, or changes in certain crossing characteristics.⁴

¹ 77 FR 64077.

² The former Federal Railroad Safety Act of 1970, as codified in 49 U.S.C. 20103, provides that “[t]he Secretary of Transportation, as necessary, shall prescribe regulations and issue orders for every area of railroad safety supplementing laws and regulations in effect on October 16, 1970.”

³ 49 CFR 1.89.

⁴ 80 FR 746.

On June 10, 2016, FRA published a final rule⁵ in response to an Association of American Railroads petition for reconsideration of FRA's January 6, 2015, final rule, addressing U.S. Department of Transportation (DOT) National Highway-Rail Crossing Inventory Reporting Requirements. This document amends and clarifies the final rule in response to the petition for reconsideration and makes certain additional amendments to the rule to address practical implementation problems that arose after the publication of the final rule.

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

All 50 states, the District of Columbia, and 646 railroads use the Form FRA F 6180.71 U.S. DOT Crossing Inventory Form (Inventory Form), to provide new crossing information or to update data in the Inventory. Without updating, the Inventory's accuracy and value would rapidly decline, and FRA would not have accurate information that informs grade crossing safety policy.

FRA maintains two types of data files: the Inventory Data File and the Accident Data File. The Inventory Data File (National File) is a record of grade crossing location, physical, and operational characteristics, which provides information for the administration and statistical analysis of highway-rail crossings. This information is reported to FRA on the U.S. DOT Crossing Inventory Form. Each State and railroad are responsible for maintaining its respective inventory file and the National File. For the files to serve as an effective database, the States and railroads must update them on a regular basis. Also, States may maintain only the National File in lieu of maintaining their own State Inventory File. Almost all States regularly get a copy of their data from FRA, or they download the data from the FRA Office of Safety Website for their own use.

The Accident Data File contains the records of all train-related accidents, injuries, and fatalities at highway-rail crossings. By law, FRA requires the reporting of all train-related accidents and incidents. FRA further requires that the DOT Crossing Inventory Number be placed on the Accident Report. This Crossing Inventory Number is assigned by the railroads by placing the Number on a completed U.S. DOT Crossing Inventory Form for that specific crossing. This information is then entered into the National File.

Routinely, the Accident Data File is integrated together with the Inventory Data File, and the information from the combination is used by the Federal Government, States, and railroads for a variety of purposes. These include developing Federal crossing safety improvement programs; funding crossing safety improvements; funding studies related to railroad safety programs; assessing the effectiveness of warning devices; analyzing needed crossing safety improvements along high-speed rail corridors; determining accident costs; and fostering public awareness, driver training, and other safety program

⁵81 FR 37521.

and research opportunities. This information is published annually in the “Railroad Safety Statistics” (formerly “Highway-Rail Crossing Accident/Incident and Inventory Bulletin”), which is distributed to all States, railroads, and interested researchers.

This combined data is also used for the DOT Accident Prediction Formula and Resource Allocation Procedure. This information is available on FRA’s website under the name WBAPS (Web Based Accident Predication System). These computer models require data and information from both the National File and the Accident Data File. The calculations and printouts prioritize crossings based on an accident prediction value to assist State program managers in optimizing the selection of crossing safety improvement projects, i.e., identifying crossings with the highest risk for having an accident.

The Inventory database is also used for program assessment, management, research, and historical analysis by many public and private entities. Requests for data have originated from States, local governments, railroads, railroad industry suppliers, safety advocates, interest groups, news media, lawyers, research organizations, Federal agencies, and Congressional offices. The most common request is for the crossing inventory and accident data history. Such requests can be fulfilled by obtaining the information from the FRA Safety Data website.

3. Extent of automated information collection.

In 2015, FRA developed the Grade Crossing Inventory System (GCIS). The GCIS is a web-based application allowing railroad, State, and transit users the ability to directly submit crossing records through three methods: (1) a web user interface to include the ability to upload one record at a time; (2) a web user interface to upload multiple records using an FRA preapproved Excel template; and (3) a web Application Programming Interface (API). The current regulations require Class I railroads to submit updates electronically via the GCIS, while non-Class I railroads may use the GCIS or submit hard-copy updates on paper. Currently, over 99% of the updates are provided electronically through the GCIS.

4. Efforts to identify duplication.

Only FRA maintains a nationwide inventory of highway-rail crossings, containing a record of every crossing and every update that was ever submitted. Some States and railroads had their own crossing inventory prior to the establishment of the national inventory in 1975. While some states and railroads still maintain their own crossing inventory data, this is usually done to supplement the current national inventory with additional data that they collect.

The information collection requirements, to our knowledge, are not duplicated elsewhere.

5. Efforts to minimize the burden on small businesses.

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” or “small businesses” as railroads, contractors, and hazardous materials shippers that meet the revenue requirements of a Class III railroad as set forth in 49 CFR 1201.1–1, which is \$40.4 million or less in inflation-adjusted annual revenues,⁶ and commuter railroads or small Governmental jurisdictions that serve populations of 50,000 or less.⁷

FRA estimates there are 592 Class III railroads that must comply with the information collection requirements in part 234 Subpart F, Highway-Rail and Pathway Crossing Inventory Reporting. While this regulation does impose both reporting and recordkeeping requirements to comply with part 234, FRA does allow for consolidated reporting by the parent corporation on behalf of its subsidiary railroads.

Additionally, the number of crossings that small railroads must provide data on is significantly less than the larger Class I railroads. Web based programs have been made available since 2015 by FRA also help to minimize the reporting burden on smaller railroads.

6. Impact of less frequent collection of information.

Failure to collect this information or to collect it less frequently would seriously jeopardize FRA’s safety program because the agency would not have the necessary information to monitor the nation’s most heavily traveled, dangerous, and high-risk highway-rail grade crossings.

As a result, FRA, and railroad stakeholders, as well as affected States, would not be able to devise and implement appropriate safety improvement programs (e.g., installation of flashing lights and gates, etc.) for these sites. The likely consequence would be an increase in the number and severity of highway-rail accidents/incidents, and a corresponding increase in the number of casualties and fatalities.

With updated data, FRA can verify that the information is accurate and reliable and can help ensure that States and railroads establish suitable safety measures and improvement programs at highway-rail grade crossings where the need is most pressing.

⁶ The Class III railroad revenue threshold is \$48,237,637 or less, for 2024. (The Class II railroad threshold is between \$48,237,637 and \$1,074,600,816; and the Class I railroad threshold is \$1,074,600,816 or more.)

See Surface Transportation Board Decision, Docket No. EP 748 Indexing the Annual Operating Revenues of Railroads, Decided June 18, 2025, available at

<https://prod.stb.gov/reports-data/economic-data/railroad-revenue-deflator-factors/>

⁷ 68 FR 24891 (May 9, 2003) (codified at Appendix C to 49 CFR part 209).

7. Special circumstances.

There are no special circumstances associated with this information collection.

8. Compliance with 5 CFR 1320.8.

As required by the Paperwork Reduction Act of 1995 (PRA) and 5 CFR part 1320, FRA published a notice in the Federal Register on September 12, 2025,⁸ soliciting comment from the public, railroads, and other interested parties on these information collection requirements. FRA received no comments from the public.

Consultations with representatives of the affected population:

FRA leads a quarterly Inventory workgroup with participants from State departments of transportation, railroads, FRA staff, and FRA's inventory contractor. The working group discusses topics, challenges, and issues related to maintaining the crossing inventory.

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 ICR.

10. Assurance of confidentiality.

The information collected is not of a confidential nature, and FRA pledges no confidentiality. It is publicly available on FRA's Office of Railroad Safety Website, [<https://railroads.dot.gov/safety-data>].

11. Justification for any questions of a sensitive nature.

There are no questions of a sensitive or private nature involving this regulation and its associated information collection requirements.

⁸90 FR 44286.

12. Estimate of burden hours for information collected.

The estimates for the respondent universe, annual response, and average time per response are based on the experience and expertise of FRA's Office of Railroad Safety.

CFR Section Part 234 Subpart F	Respondent Universe	Total annual Responses (A)	Average Time per Response (B)	Total Annual Burden Hours (C) = A * B	Wage Rate ⁹	Total Annual Dollar Cost Equivalent (D)=C * wage rates	Section analyses and estimates
234.403 Submission of data to the Crossing Inventory, generally							
—(a) and (c) Highway-rail and pathway crossing data submitted on the inventory form	50 States + DC & 646 railroads	500 forms	30 minutes	250 hours	\$89.13	\$22,282.50	Highway-rail, and pathway crossing data shall be submitted to the Crossing Inventory on the Inventory Form. Except as provided in paragraph (c) of this section, the Inventory Form may be submitted in hard copy or electronically. Based the most current crossing inventory data over the last three years, FRA estimates that railroads will complete and submit approximately 500 paper forms annually under the above requirements. Note: Reported burden includes paperwork requirements for 234.405(a)(3)
—GCIS update of designated data submitted by railroads & States/DC	50 States + DC & 646 railroads	30,000 updates	5 minutes	2,500 hours	\$89.13	\$222,825.00	Railroads and States may make web updates to the Grade Crossing Inventory System (GCIS) for each crossing record. The regulations actually require Class I to use the GCIS 49 CFR 234.403(c). Class II and III may use the GCIS or may use hard copy methods.

⁹ The dollar equivalent cost is derived from the 2023 Surface Transportation Board Full Year Wage A&B data series using employee group 200 (Professional Administrative Staff) hourly wage rate of \$50.93. The total burden wage rate (straight time plus 75%) used in the table is \$89.13 (\$50.93 x 1.75 = \$89.13).

—Excel lists of submitted data – (bulk uploads)	50 States + DC & 646 railroads	1,000 lists	5 minutes	83.33 hours	\$89.13	\$7,427.50	FRA estimates that some railroads will submit information to the Crossing Inventory by Excel Electronic format. Class I railroads will be required to use this method; other railroads have the option to use this method.
—Changes/corrections to Crossing Inventory data submitted via API computer program	50 States + DC & 646 railroads	80,000 records	5 minutes	6,666.67 hours	\$89.13	\$594,200.00	Changes and corrections submitted to FRA annually through an Application Programming Interface (API).
—(b) Written requests by States/DC & railroads for FRA Crossing Inventory Guide	FRA anticipates zero submission over the next three-year period.						
—(d) Reporting Crossing Inventory data by State agencies/DC on behalf of railroads: Written notices to FRA	FRA anticipates zero submission over the next three-year period.						
—(e)(1) Consolidated reporting by parent corporations on behalf of their subsidiary railroads: Written notice to FRA	646 railroads	15 Notices	1 hour	15 hours	\$89.13	\$1,336.95	To satisfy the reporting requirements of this section, a parent corporation may submit crossing data to the Crossing Inventory on behalf of one or more of its subsidiary railroads. The parent corporation must provide written notice to the FRA Associate Administrator that it has assumed reporting and updating responsibility for all of the subsidiary railroad's highway-rail and pathway crossings.
—(e)(2) Immediate notification to FRA by parent corporations of any changes to lists of subsidiary railroads	646 railroads	2 notices	1 hour	2 hours	\$89.13	\$178.26	The parent corporation must provide immediate written notification to the FRA Associate Administrator of any change in the list of subsidiary operating railroads for which it has assumed reporting and updating responsibility.
234.405 Submission of initial data to the Crossing Inventory for previously unreported crossings							
—(a)(1) Assigning Crossing Inventory number to each previously unreported highway-rail and pathway crossing	FRA anticipates zero submission over the next three-year period.						

—(a)(2) Primary operating railroad providing assigned Crossing Inventory number to other railroads operating through crossing	FRA anticipates zero submission over the next three-year period.						
—(c) Duty of all operating railroads: Notification to FRA of previously unreported crossing through which it operates	FRA anticipates zero submission over the next three-year period.						
—(d) Incomplete submission by State agency/DC: Written certification by primary operating railroad that State/DC has not provided requested crossing information. Provide copies of written request to each operating railroad.	FRA anticipates zero submission over the next three-year period.						
234.407 Submission of initial data to the Crossing Inventory for new crossings							
—(a) and (b) Submission of initial data to the Crossing Inventory for new crossings: Providing assigned Crossing Inventory numbers for new highway-rail and pathway crossings through which they operate by primary operating railroads to each railroad that operates one or more trains through the crossing	646 railroads	54 assigned inventory numbers	5 minutes	4.50	\$89.13	\$401.09	With the exception of highway-rail and pathway crossings that are located in a railroad yard, a passenger station, or within a private company, port, or dock area, each primary operating railroad shall assign an Inventory Number to each new highway-rail and pathway crossing through which it operates. A primary operating railroad shall assign one or more Inventory Numbers to new highway-rail and pathway crossings through which it operates, which are located in a railroad yard, passenger station, or within a private company, port, or dock area.
234.409 Submission of periodic updates to the Crossing Inventory							

—(a) Submission of periodic updates to the Crossing Inventory by primary operating railroad	The estimated paperwork burden for this requirement is included under § 234.403. Consequently, there is no additional burden associated with this requirement.						
234.411 Changes requiring submission of updated information to the Crossing Inventory							
—(a) Notification/report by railroad to primary operating railroad of sale of all or part of a highway-rail or pathway crossing	646 railroads	228 notices/ Reports	5 minutes	19 hours	\$89.13	\$1,693.47	If a railroad that is not a primary operating railroad sells all or part of a highway-rail or pathway crossing on or after June 10, 2016, it shall report the crossing sale to the primary operating railroads within three months of the date of sale.
—(b) Crossing closure: Submission of Crossing Inventory form by primary operating railroad that closes highway-rail and pathway crossing	The estimated paperwork burden for this requirement is included under § 234.403. Consequently, there is no additional burden associated with this requirement.						
—(c) Primary operating railroad submission of Crossing Inventory form for change in crossing characteristics	646 railroads	1,200 forms	5 minutes	100 hours	\$89.13	\$8,913.00	The primary operating railroad shall submit an Inventory Form, or its electronic equivalent, that reflects up-to-date and accurate crossing data for the crossing (including the change in crossing surface or change in warning device) to the Crossing Inventory consistent with § 234.403 and the Inventory Guide.
234.413 & 234 415 Recordkeeping							
—(a) and (b)(1) Railroad duplicate copy of each inventory form submitted in hard copy to the Crossing Inventory	646 railroads	500 duplicate copies	1 minute	8.33 hours	\$89.13	\$742.75	Each railroad subject to this Subpart must keep records in accordance with this section. Records may be kept either on paper or by electronic means in a manner that conforms with § 234.415.
—(b)(2) Copy of electronic confirmation received from FRA after electronic submission of crossing data to Crossing Inventory	646 railroads	111,000 copies	5 seconds	154.17 hours	\$89.13	\$13,740.88	Each railroad subject to the Subpart must also keep a copy of the electronic confirmation received from FRA after electronic submission of crossing data to the Crossing Inventory.
—(c) List of locations where a copy of any record required by this	646 railroads	646 lists	5 minutes	53.83 hours	\$89.13	\$4,798.17	Each railroad shall identify the locations where a copy of any record required to be

Subpart may be accessed and copied							retained by this subpart is accessible for inspection and photocopying by maintaining a list of such establishment locations at the office where the railroad's reporting officer conducts his or her official business.
Total	50 States + DC & 646 railroads	225,145 responses	N/A	9,857 hours		\$878,539.56	

13. Estimate of total annual costs to respondents.

There are no additional costs to respondents for this ICR.

14. Estimate of Cost to Federal Government.

FRA estimates approximately two (2) GS-14 Step 5, employees will be employed working on duties related to this ICR

The table below displays the estimated average annual cost to the Federal government related to this ICR.

COST TO GOVERNMENT:

GS-Grade Level/Step	Title	No of Employees	% of Time	Annual Salary	Burdened Annual Salary (x 75%) ¹⁰	Total Cost
GS-14/5	Program SME	1	40%	\$161,486	\$282,600.50	\$113,040
GS14/5	COR	1	25%	\$161,486	\$282,600.50	\$70,650
Contractor	Data Processing	1	100%	\$164,430	\$280,753	\$280,753
Total annual cost						\$464,443

15. Explanation of program changes and adjustments.

This ICR submission is an extension without change (with changes in estimates) to a current collection of information.

With this submission, FRA made multiple adjustments to its estimates that increased the previously approved burden hours from 8,663 to 9,857 hours and decreased the number of responses from 421,758 to 225,145. This burden increase is the result of changes described in the sections summarized below.

Under § 234.403, which describes the submission of Crossing Inventory data, generally, FRA adjusted the burden estimates to reflect the estimated number of hours and average time more accurately per response, resulting in an increase of 1,490 hours. FRA anticipates that this estimate change will accurately reflect submissions for the next three-year reporting period.

Under § 234.405, which describes the process to submit initial data to the Crossing Inventory for previously unreported crossings, FRA decreased the estimated burden by 57 hours. These regulations have been in effect since June 2016, and railroads have been submitting crossing data to the Crossing Inventory for previously unreported crossings

¹⁰ Employee wages were calculated using the 2025 [General Schedule \(GS\) Pay Calculator - By FederalPay.org](#).

since that time. Based on crossing data submitted to the Crossing Inventory during the previous three-year reporting period, FRA does not anticipate any initial submission of crossing data for previously unreported crossings.

Under § 234.411, which describes the type of changes requiring submission of updated information to the Crossing Inventory, FRA adjusted the burden estimates to more accurately reflect the number of railroads that have reported a crossing sale or closure over the past three years, and the average response time, decreasing the burden estimate by 81 hours.

Lastly, under § 234.413, which describes railroad recordkeeping requirements, FRA made multiple adjustments. FRA decreased the burden hours by 158 hours to more accurately reflect the number of records that must be kept and maintained. This reduction is the result of a significant decrease in the number of annual responses. FRA also increased the burden hours by 54 hours to more accurately reflect the burden associated with maintaining lists of locations where copies of records required by this subpart may be accessed and copied.

16. Publication of results of data collection.

FRA has no plans to publish the information collected.

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

FRA is not seeking approval to not display the expiration date.

18. Exception to certification statement.

No exceptions are taken at this time.