

Comment from Anonymous

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Comment

the drastic, wholesale shifts across multiple collection metrics raise profound structural questions. Most notably, the notice reveals a staggering 44,283-hour downward correction in safety outreach burdens due to historical double-counting, alongside a precipitous drop in Inadequate Safety Performance rail operations from 15 down to 2.

This comment formally requests that FRA provide detailed, empirical justifications explaining why these figures dropped so dramatically

Does the consolidation of these fatigue risk management hours fully account for all recurring administrative burdens, or are additional tasks being shifted into uncompensated railroad operational overhead? FRA must clarify how the absorbed burden aligns with actual rail carrier administrative workflows.