

Comment from Anonymous

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Comment

The Federal Railroad Administration (FRA) reports a precipitous 87 percent drop in the estimated number of freight railroads designated with 'Inadequate Safety Performance' (ISP), plunging from 15 operations in the previously approved collection down to just 2 operations in the current renewal. Given that an ISP designation triggers mandatory compliance with comprehensive Risk Reduction Program (RRP) requirements under 49 CFR Part 271, please provide:

1. An itemized accounting of the specific empirical data, safety metrics, and evaluation thresholds used to determine that 13 previously designated ISP operations no longer meet the criteria;
2. Clarification as to whether this reduction is solely the result of verified operational safety improvements, or whether the FRA has modified its quantitative or qualitative assessment criteria, safety metrics, or screening methodology for identifying ISP railroads; and
3. A detailed explanation of how this massive 87 percent contraction in the respondent universe reconciles with the agency's statutory mandate to ensure rigorous safety oversight, and whether this adjustment reflects a shift in enforcement discretion that alters the baseline calculation of regulatory burdens under the Paperwork Reduction Act.