

Comment from Anonymous

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Comment

FRA is executing a structural consolidation by merging the Fatigue Risk Management Program (FRMP) paperwork requirements under 49 CFR 270.409 (previously tracked separately under OMB Control No. 2130-0633) into this primary System Safety Program (SSP) collection (OMB Control No. 2130-0599).

What specific operational assumptions led FRA to estimate that a passenger rail operation can complete a comprehensive annual internal System Safety Program assessment (§ 270.303) in just 2 hours?

How will FRA ensure that absorbing Fatigue Risk Management Plan reporting (§ 270.409) into Control No. 2130-0599 does not obscure the specific, tracked compliance hours and resource allocations dedicated to fatigue mitigation?

How does FRA reconcile lowering its estimate of new passenger rail start-ups to one every three years with recent federal funding grants expanding intercity and passenger rail corridors?

Do the wage rates utilized in Table Footnote 4 (\$90.19/hr administrative, \$121.22/hr executive) accurately capture the full labor costs of specialized systems safety engineers, fatigue experts, and legal compliance personnel required to execute complex risk-based hazard analyses (§ 270.103(q))?