



## **FORT WORTH TRANSPORTATION AUTHORITY**

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March 31, 2016

Mrs. KellyAnne Gallagher, CAE  
Assistant Vice President – Member Programs and Services  
American Public Transportation Association  
1300 I Street NW, Suite 1200 East  
Washington, DC 20005

Subject: Comments regarding FRA 6180.165, Docket No. FRA-2010-0002-N-6, FR 03/07/2016

Dear Mrs. Gallagher,

Please accept this letter as the Fort Worth Transportation Authority's (FWTA) response to APTA's request for comments regarding the Federal Railroad Administration's (FRA) proposed PTC quarterly report form, FRA 6180.165.

Currently FWTA owns half of the Trinity Railway Express (TRE) and is in the process of creating a new commuter rail service that will be known as TEX Rail (TEXR). Both of these railroads meet the requirements to have a PTC system installed as per 49 CFR Part 236, Subpart I. FWTA fully intends to comply with, and satisfy, all of the requirements for railroads and their PTC systems. With that being said, FWTA has three comments/concerns in regards to FRA's proposed PTC quarterly report form.

FWTA believes that several entries on the PTC quarterly report form are overly repetitive and should remain as entries required on the, Annual PTC Progress Report (FRA 6180.166) that railroads are required to submit to the FRA on or before March 31<sup>st</sup> of each year until full PTC system implementation is complete. FWTA believes the following areas of the PTC quarterly report should be removed and remain part of the annual report.

1. II Summary & III Installation Schedule – Quarterly Reporting - Back Office Locations Completely Installed and Fully Operable. These installations are usually very large and complex installations that can take many months or years to build. Some of the nation's largest freight and commuter railroads only have a single location for these types of locations. Building and installing a Back Office Location is not the same as installing a Wayside Interface Unit (WIU) or a Computer Display Unit (CDU) in a single locomotive. Therefore, the FWTA believes this should remain as an annual reporting requirement.

2. II Summary & III Installation Schedule – Quarterly Reporting - Dispatching Locations Completely Installed and Fully Operable. These installations are usually very large and complex installations that can take many months or years to build. Some of the nation's largest freight and commuter railroads only have a single location for these types of locations. Building and installing a Dispatching Location is not the same as installing a Wayside Interface Unit (WIU) or a Computer Display Unit (CDU) in a single locomotive. Therefore, the FWTa believes this should remain as an annual reporting requirement.
3. V. Employee Training – Quarterly Reporting. FWTa believes that this section of the PTC quarterly report should not be required and should remain as an annual reporting requirement. Many sections of 49 CFR require training and reporting and FWTa believes that the PTC training and reporting should be consistent with these other sections. As an example,

**§214.343 Training and qualification, general.**

*(a) No employer shall assign an employee to perform the duties of a roadway worker, and no employee shall accept such assignment, unless that employee has received training in the on-track safety procedures associated with the assignment to be performed, and that employee has demonstrated the ability to fulfill the responsibilities for on-track safety that are required of an individual roadway worker performing that assignment.*

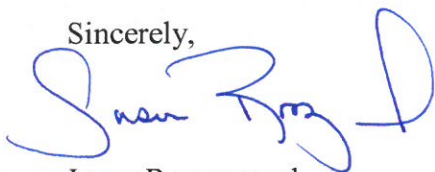
*(b) Each employer shall provide to all roadway workers in its employ initial or recurrent training once every calendar year on the on-track safety rules and procedures that they are required to follow.*

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FWTa could not find any other group of railroad employees or railroad system that requires quarterly reporting of the number of employees trained. FWTa believes that the current annual PTC training and reporting requirements are sufficient.

In closing, FWTa believes FRA's request for information contained in each railroad's Annual PTC Progress Report is fair and reasonable, but we feel that some of the information requested by FRA in their proposed quarterly report is repetitive and serves no benefit. The repetitive information in the proposed quarterly report also burdens the respective entities that fall under these requirements with providing information that provides no additional benefit.

Sincerely,



Jason Roozmond  
Systems Manager  
TEX Rail/FWTa