



# Brotherhood of Railroad Signalmen

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**Jerry C. Boles**  
President

**Michael S. Baldwin**  
Secretary-Treasurer

November 26, 2019  
(via online at [regulations.gov](http://regulations.gov))

Docket Operations Facility  
U.S. Department of Transportation  
1200 New Jersey Ave. SE, W12-140  
Washington, D.C. 20590

RE: Docket Number FRA-2019-0004-N-17, Federal Railroad Administration (FRA), Notice of information collections; request for comment.

## **Comments of the Brotherhood of Railroad Signalmen**

The Brotherhood of Railroad Signalmen (BRS) is filing comments concerning the above-referenced document that was printed in the October 2, 2019, Federal Register (Page No. 52588-52589). The BRS is the duly recognized collective bargaining representative for roughly 10,000 signal employees who are responsible for inspection, installation, construction, repair, and maintenance of all signal systems on all Class I railroads and various other Carriers in the United States. Our membership has a vested interest in the aforementioned information collection request which affects the safety of our members, local residents, railroad employees, equipment, and commodities.

In its request, the FRA seeks comments on the following Information Collection Requests (ICR) regarding: (1) Whether the information collection activities are necessary for FRA to properly execute its functions, including whether the information will have a practical utility; (2) the accuracy of FRA's estimates of the burden of the information collection activities, including the validity of the methodology and assumptions used to determine the estimates; (3) ways for FRA to enhance the quality, utility, and clarity of the information being collected; and (4) ways to minimize the burden of information collection activities on the public, including the use of automated collection techniques or other forms of information technology. The BRS will address each section below.

We believe the information collection activities are absolutely necessary, as well as imperative for the FRA to properly execute its functions. This information will assuredly have a practical utility, as it will guide the FRA on how best to improve upon or solve the issue of accidents resulting from warning system failures at crossings, as well as how to best gather data,

complaints, and ideas on how to make reporting of these issues easier. This information will better the FRA's accuracy in regard to the supposed burdens of information collection activities, including the validity of the methodology and assumptions used to determine the estimates. Furthermore, this information collection also enhances the quality, utility, and clarity of the information collection and is vital to the FRA in its regulatory duties and responsibilities for public safety. After all, if the FRA does not collect information on these issues, who would?

Both Office of Management and Budget control numbers 2130-0534 and 2130-0590 subject matter directly applies to and effects members represented by our Organization. In fact, in most instances it is our members who investigate and repair/correct issues at many crossings where these issues may occur. Furthermore, in regard to the CFR's covered in OMB Control Number: 2130-0534 we agree with FRA that highway-rail grade crossing accidents resulting from warning system failures can be reduced and would be willing to work with the FRA and any railroads to help mitigate these issues. But without the data provided through this information's collection we would all be at a disadvantage when it comes to finding a positive solution to reduce the problem.

The second portion of the ICR refers to OMB Control Number 2130-0590, more specifically, the alleged Violation Reporting Form (FRA F 6180.151). As stated by FRA, "The Alleged Violation Reporting Form allows the general public to submit alleged violations directly to FRA. The form allows FRA to collect information necessary to investigate the alleged violation and to follow up with the submitting party." It is easy to see that this form along with the information it collects and submits is vital to solving issues related to accidents at highway-rail grade crossings, not to mention required under the Rail Safety Improvement Act of 2008.

Clearly, in this case, it is in the best interest of the general public, local residents, railroad employees, and the environment to have this information collected by the FRA. As the information is collected and analyzed, it is our hope that the FRA uses this information to help our organization, others like it, and the railroads minimize the number of issues at crossings throughout the country and alleviate problems they cause to the general public.

In view of the foregoing, the BRS respectfully urges the agency to continue collecting this information and develop solutions to the issue of blocked crossings. If you have any questions, please contact my office at 540.622.6525.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Jerry C. Boles", written in a cursive style.

Jerry C. Boles  
President