

Labor Overview

Board Members and RETAC Members,

I appreciate the opportunity to meet with you all to provide input on matters that directly impact the safety, efficiency, and reliability of our rail system. Today, my input will go beyond the representation of members of the Brotherhood of Railroad Signalmen. Recently, the Association of American Railroads (AAR) submitted comments to the Department of Transportation's Request for Information, Ensuring Lawful Regulation, Reducing Regulation and Controlling Regulatory Costs. While no individual Class I railroad has formally petitioned for the repeal or rollback of federal rail safety regulations, the AAR submitted sweeping changes targeting 66 rules across safety-critical areas, including crew size, inspection intervals, employee certification, and brake system standards.

There is no guarantee that these proposed changes will be adopted by railroads in full or at all. Yet, we must treat the request for such broad regulatory relief seriously. These rollbacks remove guardrails that currently limit operational shortcuts. The result, whether immediate or phased, is an anticipated weakening of both safety standards and the personnel required to enforce them.

Among the proposed changes are calls to:

- Repeal the two-person crew size regulation, Part 218, opening the door to single-operator freight trains over long distances.
- Replace manual visual inspections of signals, brakes, and tracks with technology-only protocols, despite ongoing reliability concerns with automated detection systems. AAR petitioned the Federal Railroad Administration on May 9, 2025, for relief from CFR Part 213.23(b) and (c), Visual Inspections.
- Eliminate or revise inspection intervals for infrastructure components, such as microprocessor-based signal equipment and freight car safety standards.
- Repeal recently enacted certification requirements for signal employees and dispatchers, rules that ensure technical proficiency in positions with direct safety impact.

The AAR's proposals repeatedly cite cost savings as justification. Nowhere does it acknowledge the added risk exposure or the economic and human cost of a major rail incident. These are not simply administrative adjustments, they represent a shift away from the layered safety systems that have evolved over decades, many in direct response to tragedies.

The rail industry has undergone significant reductions in maintenance, operations, and inspection staffing over the past decade, driven by Precision Scheduled Railroading and other cost-driven strategies. The AAR's regulatory wish list threatens to shrink an already skeletal workforce further, stripping away both headcount and technical oversight that is vital for safe, timely freight movement.

Should these rollbacks be enacted, we anticipate fewer trained personnel in the field, tasked with doing more with less, increased reliance on waivers and exemptions, reducing transparency and consistency, higher potential for service disruptions and safety incidents, particularly in high-traffic corridors.

Shippers depend on reliability and accountability. Deregulation may appear to offer short-term gains, but a hollowed-out inspection and workforce risks long delays, derailments, and damage to the supply chain. Efficiency must not come at the expense of oversight.

The existing safety regulations are not arbitrary, they are the product of decades of hard-learned lessons, engineering validation, and labor-management experience. The regulatory framework must evolve, yes, but not erode. Regulatory changes should be guided by safety data, not profit margins. Railroads can innovate, but it is important to ensure public safety, employee well-being, and infrastructure integrity.