



Brotherhood of Maintenance of Way Employees Division of the International Brotherhood of Teamsters

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October 1, 2026

The Honorable Patrick J. Fuchs
Chairman
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Dear Chairman Fuchs:

I write on behalf of the members of the Brotherhood of Maintenance of Way Employees Division of the International Brotherhood of Teamsters (BMWED), the rail labor organization that represents the men and women who build, inspect, maintain, and repair the track, roadbed, bridges, and structures of this nation's railroads. I write to ask the Board to act now, and not after the next service crisis, on CSX Transportation, Inc.'s (CSX) decision to furlough a substantial portion of the workforce responsible for maintaining its railroad.

On September 11, 2026, CSX gave notice to BMWED that it was abolishing 165 permanent maintenance-of-way positions, that roughly 900 employees assigned to system production gangs would be cut, and that furloughs could reach as many as 1,062 employees in total, along with the closure of multiple headquarters locations. System production gangs are not expected to resume work until late February. At one location, the workforce responsible for 142 miles of main line track and several yards is being reduced from twelve employees to four. These reductions follow a quarter in which CSX reported record revenue of \$3.94 billion, a 17 percent increase in operating income, 6 percent volume growth, and approximately \$1 billion in net earnings.¹ Our members are not being furloughed because the work is finished, and they are not being furloughed because CSX ran out of money. They are being furloughed because the carrier made a choice to prioritize profits over meeting its common carrier obligation, over the safety of its railroad, and over the livelihoods of the employees who maintain it.

Taken together, these cuts amount to approximately 21 to 25 percent of CSX's maintenance-of-way workforce. That reduction comes on top of an erosion the Board can see in its own data. CSX reported 5,119 employees in Group 300 (maintenance of way and structures) in January 2025 and 4,927 in August 2026, before a single furlough under this program took effect. Those losses occurred in the last twenty months alone. Looking back further to when Precision Scheduled Railroading was first implemented at CSX, the Board's data show a reduction in the Group 300 force from 5,901 employees in January 2017

¹ Brotherhood of Maintenance of Way Employees Division, IBT, CSX Maintenance of Way Furloughs (Sept. 11, 2026), <https://www.bmwe.org/secondary.aspx?id=1150>.

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to 4,927 in August 2026—a loss of 974 positions, or roughly 17 percent—and a reduction of more than 1,500 positions, nearly a quarter of the workforce, from the 6,433 employees CSX reported in April 2015. If the furloughs now announced are carried out in full, CSX will have cut the forces that maintain its railroad by approximately 40 percent in little more than a decade.² The work, however, has not been reduced by 40 percent. The same route miles, the same turnouts, the same bridges and culverts and grade crossings, and the same tie, rail, surfacing, and drainage programs remain, and they will now be assigned to a fraction of the workforce that existed just ten years ago.

The consequences of this decision fall squarely within the Board’s jurisdiction. Federal law obligates a rail carrier to provide transportation upon reasonable request, and the rail transportation policy directs the Board to ensure the development and continuation of a sound rail transportation system, to foster safe and efficient service, and to encourage safe and suitable working conditions in the railroad industry.³ A carrier that removes the employees who maintain its physical plant is making a decision about its future capacity to provide service, whatever it says about its present ability to do so. The Board is not a bystander to that decision. Congress gave the Board authority to investigate on its own initiative whether a carrier is meeting the obligations this part imposes, and to require rail carriers to file periodic and special reports answering the questions the Board puts to them.⁴ That authority exists precisely for a moment like this one.

The Board has been here before. In the spring of 2022, after months of deteriorating service, the Board convened a public hearing in Ex Parte No. 770, Urgent Issues in Freight Rail Service. The record in that proceeding established that the carriers’ service failures were the product of their own staffing decisions. As then-Chairman Oberman observed, the Class I railroads had collectively cut their workforce by 29 percent over six years—roughly 45,000 employees—in pursuit of lower operating ratios, leaving them without the people needed to move their customers’ freight.⁵ On May 6, 2022, the Board directed CSX and the three other largest carriers to submit service recovery plans, to report on hiring and attrition against workforce targets, and to participate in regular calls with Board staff, and it required all Class I carriers to report service, performance, and employment data in Ex Parte No. 770 (Sub-No. 1).⁶

Earlier this year, the Board closed Ex Parte No. 770 and its reporting docket in favor of the streamlined service metrics adopted in Docket No. EP 787.⁷ Within months, CSX announced the reductions described

² Surface Transportation Board, Employment Data (Form STB-1246, CSXT), <https://www.stb.gov/reports-data/economic-data/employment-data/> (reporting CSX Group 300 employment of 6,433 in April 2015, 5,901 in January 2017, 5,119 in January 2025, and 4,927 in August 2026). Because Group 300 also includes structures and supervisory personnel, the reductions represent a larger share of the employees who perform track maintenance.

³ 49 U.S.C. § 10101(4), (11); 49 U.S.C. § 11101(a).

⁴ 49 U.S.C. § 11701(a) (investigations on the Board’s own initiative); 49 U.S.C. § 11145 (annual, periodic, and special reports).

⁵ Surface Transportation Board, STB Issues Hearing Notice for Urgent Issues in Freight Rail Service, PR-22-21 (Apr. 7, 2022) (statement of Chairman Martin J. Oberman) (“Over the last 6 years, the Class Is collectively have reduced their work force by 29% – that is about 45,000 employees cut from the payrolls.”).

⁶ Urgent Issues in Freight Rail Service, EP 770 (STB served May 6, 2022); Urgent Issues in Freight Rail Service—Railroad Reporting, EP 770 (Sub-No. 1) (STB served May 6, 2022).

⁷ Railroad Reporting, EP 787 (STB served June 2026) (adopting new weekly service metrics and closing Docket Nos. EP 770 and EP 770 (Sub-No. 1)).

above. The incentive that produced the 2022 service crisis—improving the operating ratio by removing employees faster than the work disappears—has not gone away, and once again it is being applied to the forces that maintain the track itself.

I want to be direct with the Board about why these reductions cannot be viewed as temporary staffing adjustments. Maintenance of Way employees are skilled workers whose experience is built over years, both in their craft and on specific territory they maintain. Trackmen, machine operators, welders, bridge workers, and other employees develop knowledge of recurring trouble spots, drainage conditions, rail wear, and other characteristics that cannot simply be replaced when a gang is recalled months later. When system gangs are disbanded for extended periods, experienced employees often leave for other work, and many do not return. Others are placed in the position of choosing between furlough and the exercise of contractual protective rights simply to remain employed. Once that workforce is lost CSX cannot recreate it on demand, and the consequences of that loss extend well beyond the period of the furlough itself.

The physical consequences compound in the same direction. Deferred surfacing, tie renewal, rail relay, and drainage work do not stay deferred at constant cost; each postponed cycle makes the next one larger. There is a point at which a railroad can no longer catch up on this work within any ordinary capital plan, and the carrier's answer at that stage is usually to reduce service, embargo traffic, or seek to shed the line rather than to restore the forces it eliminated. That is the point of no return this letter is meant to describe, and it is reached quietly, long before it appears in a service metric.

BMWED is also concerned that CSX's action will not remain CSX's alone. The Class I carriers watch one another closely, and each of them faces the same pressure to reduce its operating ratio, pressure that is intensified by the consolidation now before the Board. If these furloughs proceed without inquiry, they will be read across the industry as confirmation that a carrier can keep cutting its workforce without consequence, and the Board will confront four railroads in this posture rather than one.

These workforce reductions are occurring against a separate, but related, change in how CSX inspects its track. In December 2025, the Federal Railroad Administration granted an industry-wide waiver permitting carriers to reduce required visual inspections of main track from twice weekly to once weekly on territory covered by automated track geometry measurement systems.⁸ The carriers have moved quickly to implement that authority: Union Pacific's territory came under the waiver on March 29, 2026, BNSF's on April 5 and July 5, CSX's on July 5, and Norfolk Southern's on August 2—including the line through East Palestine, Ohio. The waiver now reaches nearly one-third of all Class I track miles.⁹

BMWED does not oppose automated track inspection. We oppose using automated track inspection as a replacement, instead of assistance, for the trained employees who visually inspect the railroad. Automated geometry systems are designed to identify a limited category of track conditions. Automated

⁸ Federal Railroad Administration, Waiver Decision, Docket No. FRA-2025-0059 (Dec. 5, 2025).

⁹ Brotherhood of Maintenance of Way Employees Division, IBT, Track Inspection, <https://www.bmwe.org/trackinspection> (listing the effective date of each carrier's participation: Union Pacific, March 29, 2026; BNSF South, April 5, 2026; BNSF North and CSX Transportation, July 5, 2026; Norfolk Southern, August 2, 2026).

track inspection detects only about 26 percent of track defects. The remaining 74 percent—broken or missing fasteners, defective joint bars, washouts, pumping ties, and other conditions that require a trained person on the ground—can be found only by a qualified inspector. That conclusion is not theoretical: the inspection reports the carriers themselves file under the waiver show that human inspectors continue to identify substantially more reportable defects than automated track inspection does.¹⁰

CSX's reduced visual inspection frequency and its separate decision to reduce the Maintenance of Way workforce each raise concerns about the condition and reliability of the Carrier's infrastructure. The Surface Transportation Board does not regulate track inspection standards, but it does have a direct interest in the service consequences that can result when track conditions are not timely identified or corrected. Speed restrictions, removal of track from service, and other operating limitations reduce capacity, increase transit times, and can disrupt service well beyond the location where the condition exists. Those impacts will ultimately appear in the Board's own service data, including velocity, terminal dwell, and trip plan compliance, and bear directly on CSX's ability to satisfy its common carrier obligation. BMWED therefore respectfully requests that the Board take the following actions:

1. Open a proceeding, or convene a public hearing, on Class I maintenance-of-way staffing and deferred maintenance. A proceeding would allow the Board to develop a record on what maintenance work is being deferred across the industry, what staffing levels the carriers intend to sustain, and what the service consequences will be. BMWED is prepared to provide testimony from the employees performing this work, together with our data on inspection and defect findings.
2. Restore and strengthen employment reporting. The Board receives monthly employment data by job group under 49 C.F.R. part 1246, including Group 300.¹¹ That reporting should be supplemented, as it was in Ex Parte No. 770 (Sub-No. 1), to require the Class I carriers to report furloughs, recalls, vacancies, and the use of outside contractors in maintenance-of-way service, together with hiring and retention plans against stated targets.
3. Require CSX to explain, on the record, how it will meet its common carrier obligation with a reduced maintenance workforce, including which capital and maintenance programs have been deferred or canceled, how many production gangs have been disbanded and when they will be restored, which subdivisions are affected, and how the carrier will avoid slow orders, embargoes, and service interruptions attributable to track conditions.
4. Collect and publish data on track-related service impacts, including temporary speed restrictions and service interruptions caused by track conditions, with location and duration. Those measures would give the Board advance warning of deteriorating infrastructure rather than a retrospective account of a service failure.

¹⁰ Id. BMWED's review of the inspection reports the carriers themselves file under the waiver shows that human inspectors continue to identify substantially more reportable defects than automated systems.

¹¹ 49 C.F.R. pt. 1246.

5. Coordinate with the Federal Railroad Administration concerning the automated track inspection waiver. The reduced inspection frequency permitted by that waiver rests on assumptions about the carriers' inspection and maintenance programs. The Board should share what it learns about CSX's maintenance staffing and deferred work with FRA and ask whether these reductions are consistent with the representations on which the waiver was granted.
6. Account for maintenance-of-way staffing and infrastructure investment in pending proceedings concerning further consolidation of the rail industry. A carrier's willingness to reduce the forces that maintain its railroad while reporting record earnings is directly relevant to the service and investment commitments the Board should require of any merged system.

Our members have spent their careers keeping this railroad safe and in service, frequently in weather and conditions that most people never see. What is now unfolding on CSX is a crisis in the making, and it cries out for this Board's action. Every week that passes without it, more gangs are disbanded, more experienced employees leave this industry for good, and more work is added to a backlog that no future capital plan will fully recover. They are not asking the Board to run CSX. They are asking the Board to exercise the authority Congress gave it before a carrier's cost-cutting becomes a service failure that shippers, passengers, and communities across the CSX system will pay for.

I would welcome the opportunity to meet with you and the other Members of the Board to discuss this matter, and BMWED stands ready to provide whatever additional information would assist the Board. Thank you for your attention.

Respectfully,



Tony D. Cardwell
President
BMWED-IBT

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CC: The Honorable Michelle A. Schultz, Vice Chairman
The Honorable Karen J. Hedlund, Board Member
The Honorable Richard J. Kloster, Board Member