

67th Meeting

Railroad Safety Advisory Committee

National Association of Home Builders
1201 15th Street NW; Washington, DC 20005

October 9, 2024

Task No: 2022-03

Objective: FRA is considering an action to move forward with codifying C³RS in regulations and eliminate waivers for each participating railroad or railroad association. The proposal was discussed and presented at the last C³RSWG virtual meeting in May. FRA received three comments in response to the proposal and will address those comments either prior to publication of an NPRM or in the NPRM itself.

Background: The C³RS Working Group was unable to achieve consensus regarding a standardized IMOU that could be implemented nationwide. However, progress has been made with individual Class I railroads and its labor unions negotiating several pilot IMOU's that have been signed and implemented. The FRA C³RS Implementation Team continues to have discussions with additional Class I railroads and its labor unions to expand the concept of pilot IMOU implementation.

On May 22, 2024, the C³RSWG met virtually to discuss next steps with respect to Task No: 2022-03. FRA proposed a framework by which C³RS would be codified in regulations to streamline participation in the program and eliminate the burden of each railroad and/or railroad association from petitioning FRA for waivers including subsequent renewals. FRA concluded the framework proposal by requesting working group members to submit comments or concerns.

Comments were submitted by BLET, SMART-TD and AAR.