

**U. S. DEPARTMENT OF TRANSPORTATION  
FEDERAL RAILROAD ADMINISTRATION**

**FRA 2020 EMERGENCY RELIEF DOCKET**  
**DOCKET NO. FRA-2020-0002-0022**  
**DOCKET NO. FRA-2020-0002-0025**

**REQUEST FOR EXTENSION OF TIME IN WHICH TO FILE  
COMMENTS AND REQUEST FOR PUBLIC HEARING**

The Brotherhood of Locomotive Engineers and Trainmen (BLET)<sup>1</sup> and the Transportation Division of SMART (SMART TD)<sup>2</sup> hereby request that the FRA extend the time in which to file comments up to and including April 10, 2020. The Organizations also request a public hearing. In support of these requests, BLET and SMART TD show as follows:

1. By letter dated March 25, 2020 (posted in the online docket on March 26) the Administrator granted in large part the March 21, 2020 request (which itself was not posted until March 25 ((see <https://www.regulations.gov/document?D=FRA-2020-0002-0022>)) filed by the Association of American Railroads (AAR), the American Short Line and Regional Railroad Association (ASLRRA), and the American Public Transportation Association (APTA) for wide ranging relief from the application of scores of safety

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<sup>1</sup> BLET represents locomotive engineers on every Class I railroad, Amtrak, and on nearly all commuter railroads; it also represents operating and other employees on many regional and shortline railroads.

<sup>2</sup> SMART TD represents employees on every Class I railroad, Amtrak, and on many regional and shortline railroads. Membership is drawn primarily from the operating crafts conductors, brakemen, switchmen, ground service personnel, locomotive engineers, hostlers and workers in associated crafts.

regulations contained in 49 CFR Parts 213, 214, 217, 218, 219, 220, 228, 229, 232, 234, 236, 239, 240, and 242.1.

2. The Administrator's letter stated:

Petitioners' request was posted to the docket on March 23, 2020.[\*] The Petition is available for public review and comment, and under 49 CFR § 211.45(h), any comments on the petition will be considered to the extent practicable. If any party desires a public hearing on the Petition, that party must notify FRA by the end of the day on March 28, 2020.

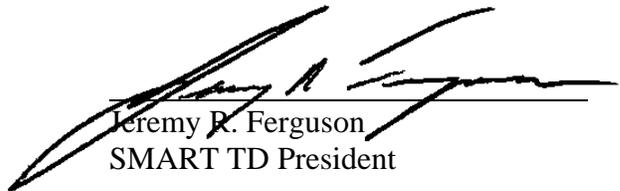
[\* As noted above this was incorrect.]

3. BLET and SMART TD intend to file comments and have requested a public hearing, but it is unreasonable to expect them to do so in a two-day period given that the Administrator's letter was issued with no advance notice to the public, and the emergency relief granted by the Administrator is so broad and all-encompassing that more time is needed to formulate a response.

For these reasons, BLET and SMART TD request that the time for filing comments be extended to and including April 10, 2020.



Dennis R. Pierce  
BLET National President



Jeremy R. Ferguson  
SMART TD President