



Washington Legislative Office

Transportation Division

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President

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National Legislative Director

December 19, 2014

Joseph C. Szabo, Administrator
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Administrator Szabo:

**Petition by the
International Association of Sheet Metal, Air, Rail Transportation
Transportation Division
To Allow Union Officials Onto Railroad Property to Inspect Such Property for Safety**

The International Association of Sheet Metal, Air, Rail Transportation - Transportation Division hereby petitions the Federal Railroad Administration to promulgate a regulation authorizing union officials to enter onto railroad property to inspect such property in order to determine compliance with safety laws and regulations. Suggested regulatory language is as follows:

"The collective bargaining representative for each craft of railroad worker and the state director for each such craft may monitor the safety practices and operations on each railroad, and each is authorized to carry out such inspections, examinations, and investigations on railroad property as may be necessary to determine compliance with applicable safety laws and regulations."

As noted by the GAO in a report on December 9, 2013 (GAO-14-85), the FRA estimates that its inspectors have the ability to annually inspect less than 1% of railroad activities covered by its regulations. The allowance of additional persons to inspect for compliance with the regulations would be a great asset to the safety of the railroad industry, and would not cost the FRA anything.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Risch". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

John Risch
National Legislative Director

Cc: Robert Lauby, FRA Associate Administrator for Railroad Safety/Chief Safety Officer
Melissa Porter, FRA Chief Counsel
John Previsich, SMART-Transportation Division President
John E. Lesniewski, SMART-Transportation Division Vice President
Greg Hynes, SMART-Transportation Division Alternate National Legislative Director