



1200 New Jersey Avenue, SE  
Washington, DC 20590

U.S. Department  
Of Transportation

Federal Railroad  
Administration

Josh Combs  
Director of Operations  
North County Transit District  
810 Mission Avenue  
Oceanside, CA 92054

September 13, 2022

Dear Mr. Combs:

This letter responds to North County Transit District (NCTD) submission dated July 30, 2022, to the Federal Railroad Administration (FRA) seeking approval of its material modifications to the NCTD Conductor Certification Program received by FRA on July 30, 2022. NCTD has complied with FRA's procedures for submission and approval of programs as described in appendix B to 49 CFR part 242. FRA reviewed the railroad's program modification and determined that the railroad's program modification conforms with the requirements of 49 CFR part 242 for the reasons discussed below.

Your submission states that on August 3, 2022, the railroad provided a copy of its program modification to Mr. Dennis Pierce, President of BLE, and Mr. Jeremy Ferguson, President of SMART-TD labor organization representing the railroad's employees. FRA received no comments on the program or program modification by the labor organizations.

The program modifications are consistent with the model of the previously approved Class III railroad programs. FRA understands that the modifications are intended to provide more detail to the conductor certification process and update contact information. Additional modifications to the submission also addressed deficiencies with the standard requirements of 49 CFR part 242, appendix B.

Please continue in your efforts to improve railroad safety on your system.

Please contact me with any questions regarding this submission at (202) 366-0978 or [FRAOPCERTPROG@dot.gov](mailto:FRAOPCERTPROG@dot.gov) or [Kevin.Lewis@dot.gov](mailto:Kevin.Lewis@dot.gov)

Sincerely,

Kevin Lewis  
FRA Program Manager Certification

pp Christian Holt  
Operating Practices Staff Director