



1200 New Jersey Avenue, SE
Washington, DC 20590

U.S. Department
Of Transportation

Federal Railroad
Administration

Mr. Daniel Rouleau
Director of Train Crews
Keolis Commuter Services Operator
Massachusetts Bay Transit Authority
32 Cobble Hill Road
Somerville, MA 02143

August 14, 2024

Dear Mr. Rouleau:

This letter responds to the Keolis Commuter Service operating as a contractor for (MBTA) submission dated August 16, 2024, to the Federal Railroad Administration (FRA) seeking approval of its material modifications to the MBTA Conductor Certification Program received by FRA on June 27, 2024. (MBTA) has complied with FRA's procedures for submission and approval of programs 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 June 28, 2024, the railroad provided a copy of its program modification to Mr. Edward Hall, 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 I passenger railroad programs. FRA understands that the modifications are intended to provide more details about 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. Detailed training standards have been established in Section Four of your conductor training program.

Please contact us with questions regarding this submission at (202) 366-0978 or FRAOPCERTPROG@dot.gov or Kevin.Lewis@dot.gov or Kurt.Erickson@dot.gov.

Sincerely,

Kevin Lewis
FRA Program Manager Certification

pp Christian Holt
Operating Practices Staff Director