

Transit Worker Hours of Service and Fatigue Risk Management

Virtual Public Listening Session

December 5, 2023

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Presentation Purpose and Agenda

The purpose of this listening session is to allow interested persons to present comments, views, and relevant research on transit worker hours of service and fatigue risk management programs.

Presentation Agenda

- Why Transit Worker Fatigue?
- Overview of the ANPRM
- ANPRM Question Summary
- Submit Your Comments!



Why Transit Worker Fatigue?



The National Transportation Safety Board (NTSB) has recommended that FTA publish regulations addressing transit worker fatigue since 2004

Why Transit Worker Fatigue?



Why Transit Worker Fatigue?



Transit Advisory Committee for Safety (TRACS)

- Transit worker fatigue is a “serious problem”
- Hours of service is a “fundamental, initial pillar of a Safety Management System (SMS) framework and should be implemented by FTA as soon as possible.”



Existing Federal Regulations

- Federal Motor Carrier Safety Administration
- Federal Railroad Administration
- Federal Aviation Administration
- United States Coast Guard



Overview of the ANPRM

The ANPRM asks for public input on two topics related to transit worker fatigue:

- Hours of Service
- Fatigue Risk Management



ANPRM Question Summary

A. Regulatory Options

1. Why should or should not FTA adopt hours of service and fatigue risk management requirements for transit workers?
2. What aspects of transit operations should FTA consider in a requirement?
3. What are the reasons you would or would not support FTA's adoption of existing industry recommendations (e.g., from Volpe, from FMCSA) on hours of service and fatigue risk management?
4. What qualities of workers' regular tasks should FTA consider to make them subject to hours of service requirements?
5. Would you support a single standard that applies across all modes subject to FTA's safety authority? Or should standards differ across bus and rail, for example?
6. Should shift schedulers have minimum certification and training requirements?



ANPRM Question Summary

B. Benefits and Costs

7. How would changes in hours worked impact worker health and safety?
8. Do you have any information on any hours of service research that FTA should consider for this rulemaking?
9. How would changes in hours worked impact transit agency operations and customers? What costs would agencies incur to change their operations and ensure that workers comply with the requirements?



ANPRM Question Summary

C. Fatigue Data Collection

10. Is the prevalence of fatigue among transit workers and its safety implications tracked or measured? Do you have any data on the prevalence of fatigue?
11. As a standard process, do investigations consider fatigue as a probable cause or contributing factor in a transit safety event?
12. Would you support requirements for State Safety Oversight Agencies in investigating the potential role of fatigue in rail safety events and near misses?
13. Would you support routine data collection through the National Transit Database on whether an incident was fatigue-related?
14. What would be the benefits and burdens to the industry if FTA implemented new NTD requirements to record transit worker fatigue?
15. Should FTA consider gathering data on fatigue incidents from operators not currently required to file major safety event reports?



ANPRM Question Summary

D. Current Hours of Service and Fatigue Risk Management Policies

16. Do you have information or data on how transit agencies are using their documented safety risk management processes to address fatigue?
17. Do you have information on existing State or local hours of service or fatigue risk management policy requirements that apply to transit workers?
18. Is transit worker secondary employment tracked? Do transit agencies face any limitations on their ability to track secondary employment?
19. Do you have information on transit worker schedules, such as shift length, breaks, split-shift policies, or off-duty time?
20. What fatigue-related factors are considered when developing bus and rail schedules?
21. Do you have information on transit agency use of other safety enhancing policies or technology solutions that FTA should consider?



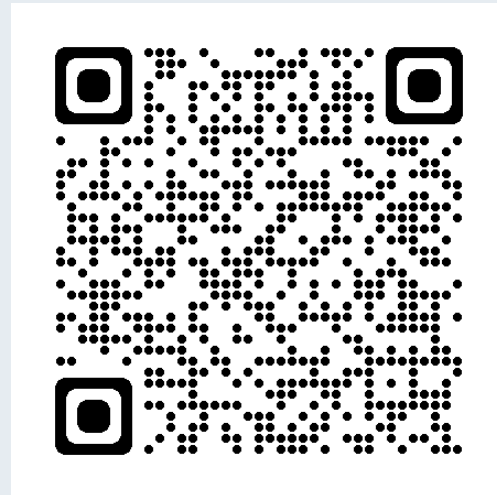
Submit Your Comments!

Comment by December 29

Submit your comments at:

[Regulations.gov](https://www.regulations.gov)


Docket Number
FTA-2023-0018




- Any individual or group may submit comments on part or all of the ANPRM
- Commenters may submit data and research

Submitting Comments to the ANPRM (1 of 4)

1. Navigate to <https://www.regulations.gov/document/FTA-2023-0018-0022>

SUPPORT

Docket (FTA-2023-0018) / Document

 **PROPOSED RULE**

Transit Worker Hours of Service and Fatigue Risk Management
Posted by the **Federal Transit Administration** on Oct 30, 2023

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FTA-2023-0018-0022

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Content

Action
Advance notice of proposed rulemaking (ANPRM).

Summary

Comment Period Ends: 59 Days



Submitting Comments to the ANPRM (2 of 4)

2. Click on the “Comment” box

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SUPPORT

Docket (FTA-2023-0018) / Document

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Submitting Comments to the ANPRM (3 of 4)

3. Type your comment into the text box or add as a file attachment

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[Commenter's Checklist](#)

Comment*

Start typing comment here...

5000

What is your comment about?

Select a Comment Category

Attach Files

You can attach up to 20 files, but each file cannot exceed 10MB. Valid file types include: bmp, docx, gif, jpg, jpeg, pdf, png, pptx, rtf, sgml, tif, tiff, txt, wpd, xlsx, xml.

Drop files here or [Browse...](#)



Submitting Comments to the ANPRM (4 of 4)

4. Select your identity (individual, organization, or anonymous) and submit!

Tell us about yourself! I am...*

(Select an identity below)



An Individual

If you or another single person is the author



An Organization

A company, organization, or government agency



Anonymous

If you do not want an entity associated with the comment

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! Do not submit personally identifiable information through this form. Any personally identifiable information (e.g., name, address, phone number) included in the comment form or in an attachment may be publicly disclosed in a docket or on the Internet (via Regulations.gov, a federal agency website, or a third-party, non-government website with access to publicly-disclosed data on Regulations.gov). By submitting a comment, you agree to the [terms of participation](#) and [privacy notice](#).

Submit Comment



Public Comment

Focus Areas

- A. Should FTA adopt hours of service and fatigue risk management requirements for transit workers?
- B. How would changes in hours impact worker health and safety and agency operations?
- C. How do agencies track the prevalence of fatigue? Should FTA collect additional data to better track the safety impacts of fatigue?
- D. Do you have information or data on existing state, local, or agency-specific hours of service and fatigue risk management requirements?



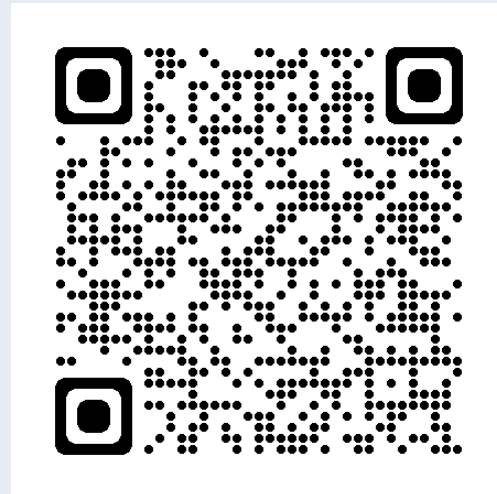
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