



President & CEO – Joanne F. Casey

November 2, 2023

The Honorable Sam Graves  
Chair  
House Committee on Transportation and Infrastructure  
U.S. House of Representatives  
Washington, DC, 20515

The Honorable Rick Larsen  
Ranking Member  
House Committee on Transportation and Infrastructure  
U.S. House of Representatives  
Washington, DC, 20515

Re: Rail Worker and Community Safety Act – H.R. 5871

Dear Chair Graves and Ranking Member Larsen:

The Intermodal Association of North America (IANA) is North America's leading industry trade association representing the combined interests of the intermodal freight industry. IANA's membership roster of over 1,000 corporate members includes intermodal and over-the-road motor carriers, railroads (Class I, short-line, and regional), water carriers, port authorities, marine terminals, intermodal marketing and logistics companies, and suppliers to the industry such as equipment manufacturers, intermodal leasing companies, and technology firms. IANA's associate (non-voting) members include shippers (defined as the beneficial owners of the freight to be shipped), academic institutions, government entities, and non-profit associations. Our mission is to promote the growth of safe and efficient intermodal freight transportation through innovation, education, and dialogue.

Ensuring safe rail transportation is of paramount importance to IANA, as the Association's members live in the communities served by rail, and the success of the intermodal industry is dependent upon the safe transportation of cargo. The already strong safety record on the nationwide intermodal rail network continues to improve due to railroads' robust investments in infrastructure and technology. In fact, recently released 2022 Federal Railroad Administration train accident data indicates that both the mainline train accident rate as well as the hazardous materials accident rate are at an all-time national low.

As Congress debates rail safety legislation, IANA urges you to evaluate carefully whether any data demonstrates that a given policy would actually improve safety and reduce accidents. For example, several provisions within the Rail Worker and Community Safety Act pertaining to train consist and length, crew size, and operating practices not only remain untested but fail to recognize the day-to-day realities of intermodal operations as well as potential unintended consequences. Such provisions are not supported by data and could potentially disrupt supply chain modernization, competition, and efficiency. Moreover, many of these provisions are redundant to regulatory actions already underway.

IANA opposes legislation such as the Rail Worker and Community Safety Act that would substantially change the current laws under which freight railroads operate without attendant safety benefits and urges your opposition to this bill. Railroads have upheld stringent safety standards, voluntarily employed various safety measures, and maintained strong safety records. Overall, new burdens on the railroad industry that are not directly linked to safety improvements will adversely impact the industry's ability to make critical investments in safety technologies as well as other innovations necessary to remain competitive and to address customer needs.

We appreciate your consideration of our views as well as your leadership on this important issue and offer our assistance in working with you toward our shared goal of enhancing intermodal supply chain safety, reliability, and efficiency.

Sincerely,

Joanne F. Casey  
President and CEO  
Intermodal Association of North America