



September 24, 2026

Christian Holt  
Staff Director, Operating Practices Division  
Federal Railroad Administration  
U.S. Department of Transportation  
1200 New Jersey Ave, SE W-32  
Washington, DC 20590

**Re: Docket No. FRA-2026-2014 — Qualification and Certification of Locomotive Engineers and Conductors**

Dear Mr. Holt:

The Border Trade Alliance (BTA) appreciates the opportunity to comment on the Federal Railroad Administration's proposed rule concerning locomotive engineer and conductor qualifications. For 40 years, the BTA has supported public policy that promotes secure, efficient cross-border trade across all modes of transportation. Our members include logistics service providers, carriers, brokers, and other stakeholders whose work depends on efficient trade across the United States-Mexico border.

Our response to Docket No. FRA-2026-2014 is limited to the proposed provisions governing train movements between the border and a nearby U.S. railroad yard.

Moving crew changes and inspections from a rail bridge to an appropriate yard can reduce a bottleneck at a busy border crossing and provide a more suitable location for those activities. The proposal recognizes a role for nearby yards by allowing a Mexican-based crew to operate between the border and a U.S. yard whose southernmost point of entry is within 10 route miles of the border.

We respectfully request that FRA clarify that a railroad may use the most practical entrance to an otherwise qualifying yard, even when reaching that entrance requires the train to travel slightly farther than 10 route miles. A yard's eligibility would still depend on its southernmost point of entry being within the proposed 10-route-mile limit. This clarification would permit a railroad to use an entrance that better accommodates its track layout and receiving capacity without making a more distant yard eligible.

BTA believes FRA could accommodate efficient border operations while retaining the proposed geographic limit on yard eligibility by accounting for how trains enter and move within qualifying yards.

The BTA offers its decades of collective experience in cross-border commerce as a resource to your agency as you further consider this important proposal.

Sincerely,

Pete Sepulveda, Jr.  
Chairman

Britton Mullen  
President