

May 28, 2023

Amit Bose, Administrator
Federal Railroad Administration
U.S. Department of Transportation
1200 New Jersey Ave., S.E.
Washington, DC 20590

Dear Administrator Bose:

I am writing to you to petition that the Federal Railroad Administration take appropriate action to reduce the possibility that tractor-trailers will get stuck on high centered railway crossings.

As a survivor of a major truck crash and mother of two daughters who died due to a truck underride crash on May 4, 2013, I have been advocating for comprehensive underride protection on large trucks in order to make truck crashes more survivable. In the process, I have been told repeatedly that side underride guards would cause more tractor-trailers to get hung up on high-centered crossings. So I decided to do some investigation. This is what I have learned:

1. From a FRA spreadsheet, during 2014-2018, there were ZERO fatalities coded as "Truck Stuck on Tracks." I learned that in 2019.
2. Yesterday, I searched a more recent FRA website and found that from 2017-2022 there were two fatalities in the U.S. coded as "Truck-Trailer Stalled or Stuck on Crossing."
3. While this is minimal compared to the hundreds of deaths which could be prevented by side underride guards each year, nonetheless it is a safety problem. [*Low-Clearance Vehicles at Rail-Highway Grade Crossings: An Overview of the Problem and Potential Solutions*](#); [*How 'low ground clearance' railroad crossings can be made safer*](#)
4. Doug Smith, a member of the NHTSA Advisory Committee on Underride Protection, stated at our first meeting on May 25: "There are 162,827 public railroad crossings," he said. "There are 1,160 low-clearance railroad crossings, according to the Federal Railroad Administration. I'm pretty sure there is no one else on this committee who has experienced the sheer terror of being grounded on a railroad crossing." [Underride committee must remain objective, trucker says](#)
5. Doug Smith also stated that some of these hazardous crossings do not have proper signage to alert truck drivers to this hazard.
6. The FRA previously funded research to study and develop Low Clearance Vehicle Detection & Warning Systems. I am aware that Phase I was completed but I do not know if Phase II has been funded and completed. [LOW GROUND CLEARANCE VEHICLE DETECTION AND WARNING](#), 2015, FRA Office of Railway Policy & Development <https://www.syntek.org/portfolio-2/low-clearance-vehicle-detection-and-warning-system/>
7. Signs are already available to meet crossing safety requirements. [Grade Crossing Safety Requirements](#); [MUTCD Compliant Railroad Crossing Sign: Railroad Low Ground Clearance \(X-W10-5\)](#)

I do not know the extent of your authority in this matter. But I am hereby petitioning the Federal Railroad Administration, in collaboration with the National Highway Traffic Safety Administration and the Federal Motor Carrier Safety Administration, to look into this matter and address this railway safety issue to ensure that:

1. Hazardous crossings are properly marked as soon as possible.
2. Low Ground Clearance Vehicle Detection and Warning System research and development are completed as soon as possible, if it has not already been completed.
3. Rulemaking is issued to require that LGCVDS technology is installed as appropriate to improve railway and roadway safety.

The Department's National Roadway Safety Strategy should be followed in this matter, with a sense of urgency, if safety is truly the mission. I look forward to hearing from you soon.

Respectfully,

Marianne Karth

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