



ASSOCIATION OF  
AMERICAN RAILROADS

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**JUSTIFICATION – CRITICAL INFRASTRUCTURE ESSENTIAL CONTRACTOR**  
**ALLTRANSTEK – COVID-19 VACCINATIONS**

The bearer of this correspondence is an **essential contractor retained by Alltranstek**. In this capacity, the contractor performs **critical functions required to assure safe, secure, and efficient railroad operations**. These efforts directly support movements of people and cargo, keep vital supply chains flowing, reinforce resilience of transportation networks, and mitigate the risk of economic downturns and their effects at the local, regional, and national levels. As demonstrated by experience at the outset of the pandemic, when supply lines are disrupted, adverse consequences follow quickly.

As of March 19, 2020, the Department of Homeland Security (DHS), through its Cybersecurity and Infrastructure Security Agency (CISA), published **guidance designating Essential Critical Infrastructure Workers** for the declared national emergency caused by the coronavirus disease 2019 (COVID-19) pandemic.

- The purpose of the guidance is to support state and local authorities in **identifying “essential workers needed to maintain the services and functions Americans depend on daily** and that need to be able to **operate resiliently during the COVID-19 pandemic response.”**
- This guidance covers **employees and contractors of freight and passenger railroads** as well as **workers that support operations and maintenance of railroad infrastructure**.
- The **United States Surface Transportation Board endorses the CISA guidance** and urges state and local authorities “to recognize the importance of railroad operations and to support the ability of railroads and their supply chain partners to contribute to the national welfare.”
- In early December 2020, CISA re-issued Version 4.0 of its guidance on essential workers to state and local government authorities.
- In this version, **CISA urges officials in state and local governments to consider and determine “allocation of scarce resources for workers”** – specifically citing “vaccines.”

On allocation of COVID-19 vaccinations, the **Centers for Disease Control and Prevention (CDC)**, based on the recommendations of experts in infectious diseases and immunization practices, has issued guidance prioritizing **essential workers, as defined by CISA, in Phase 1** for vaccine allocations. Among the categories of essential workers specifically cited by the CDC are those working to support “public transportation” and “Transportation and logistics.”

Meriting emphasis is the **reliance of other prioritized essential workers on railroads, freight and passenger**. Railroads' employees and contractors transport the products and materials, and in some instances, provide services, that these essential workers require to perform critical functions. "Manufacturers" cannot produce goods without the materials railroads ship; nor can their products get to markets or customers without rail transport. Mail and packages handled and delivered by "US postal service workers" and other delivery services are transported by rail. "Food and agriculture" products are transported by rail. What is sold by "Grocery store workers" is transported by rail. In the numerous metropolitan areas with commuter rail and Amtrak service, freight railroads often own the track and their workers provide critical functions that ensure safe and efficient operations, including dispatching, track and signals inspections and maintenance, and, in some cases, operating commuter trains. The CDC guidance acknowledges the need to **maintain resiliency in transportation modes and the scope and impact of critical functions these workers perform**, which span across sectors and local and state jurisdictions.

The **surges in COVID-19 infections** during the fall and winter of 2020 into 2021 have **escalated dramatically the exposure of essential workers to the virus, including rail workers**. A healthy, safe, and efficient essential rail workforce underpins a stronger economy that can avoid a second severe downturn in less than a year. **Administration of vaccines to essential rail workers adds a very effective measure to the multi-faceted approach for mitigation of the spread of the virus** that railroads and industry organizations have maintained since early 2020, encompassing worker education and assistance, facial coverings, other protective equipment, social distancing where practicable, and much expanded cleaning and hygiene regimes.

For these reasons, state and local authorities and public health officials, as well as medical and health care providers and pharmacists, are respectfully asked to **administer a COVID-19 vaccination, granted emergency use authorization by the Food and Drug Administration (FDA) and CDC**, to the worker presenting this correspondence under the **Phase 1 allocation**.

The Association of American Railroads (AAR), as manager of the Rail Sector Coordinating Council (SCC) established pursuant to the National Infrastructure Protection Plan (NIPP), works with DHS and its components, including the Federal Emergency Management Agency (FEMA), and with the Department of Transportation (DOT) and the Federal Railroad Administration (FRA) on preparedness for effective protective and response measures and operational resilience.

This correspondence is valid for the period of **February 7 to June 30, 2021**. Questions may be directed to me via the contact means indicated in the signature block below.

Sincerely,



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