

§ 659.21 Rail transit agency internal safety and security reviews. Section 659.21(e) requires an annual "formal letter of certification signed by the rail transit agency's executive director or general manager". I am uncertain as to what this will accomplish. Suggest that the certification be replaced by a requirement that the annual report be verified by means of a cover letter or other sign-off by the rail transit system director or general manager. If there is an outstanding compliance issue or pending action resulting from a finding or investigation, where non-compliance exists during the certification timeframe, then the certification could be deemed invalid or it would be necessary to consider it conditional until such time correction action is implemented. If certification remains a requirement by the rule, it will need to provide for outstanding compliance issues that may occur during the certification period.