October 8, 2026
Comments on the Proposed Amtrak Corporate Restructuring

To the Amtrak Board of Directors:

Public Rail Now urges the Board not to adopt the proposed corporate restructuring on the current record.

The record is incomplete.
The framework presented at the September 9 Board meeting is preliminary, with working titles subject to change and no implementation date. It provides no financial projections, no account of how costs will be allocated among the three entities, and no organization chart below the Board. A restructuring of this scale should not proceed to a vote without them. Specifically, the Board should disclose, in writing:

- What the full organization chart would look like, including how each entity's leadership reports upward
- Why Infrastructure and Fleet are structured as co-equal to Passenger Services rather than subordinate to it, and what mechanism resolves disputes between units held to separate performance measures
- The projected cost of implementing this restructuring
- Specific, measurable goals for each entity at one, five, and ten years

Workers need written commitments, not reassurance.
When the FRA's restructuring plan was first disclosed, BLET's Amtrak General Committee of Adjustment warned that “shifts of this nature raise legitimate and substantive concerns regarding the maintenance of qualifications, preservation of established work jurisdiction, crew utilization practices, pilot requirements, and, most importantly, the continued protection and enforcement of existing Agreement rights” (Patrick Darcy, chair). SMART-TD has separately warned that when profitability becomes an organization's driving goal in a low-margin market, “the easiest target” for cost-cutting is staff, “who are already stretched thin,” on trains already running short-staffed.

The Board's own framework commits each entity to “specific responsibilities and performance measures” within a parent that remains “operated and managed as a for-profit company.” That warning applies directly to a structure that formalizes profit-and-loss accountability at the operating-entity level. Both the Department of Transportation and Amtrak have stated this is not privatization; neither has specified what legal or financial guardrail prevents it from becoming that. Before any vote, the Board should commit in writing that existing collective bargaining agreements, Railroad Retirement coverage, and labor protective arrangements carry over intact to every

subsidiary, and should disclose what performance measures the operations entity will be held to, confirming that staffing levels will not be
among the levers used to meet them.

Congress and the public must be part of this decision, not briefed on it afterward.
The Rail Passengers Association has stated plainly that "there must be buy-in from the U.S. Congress and States," and that any restructuring not done in conjunction with the Congressional debate over surface transportation reauthorization "will be DOA." We agree. The Board should commit to no final restructuring decision ahead of that Congressional process, and should publish the full framework —including the financial and labor analyses requested above — for public comment through the Federal Register or an equivalent public docket.

Funding, not structure, is the actual constraint.
The Rail Passengers Association has warned that without predictable and sufficient public funding, this restructuring is "certain to fail," and that if it is an attempt to reduce public investment, the predictable result is "privatization of profits, socialization of losses, deferred investment in infrastructure, and the degradation of frequencies and service quality — particularly for routes that serve rural and small town America." Highways and airports have dedicated trust funds; Amtrak competes annually for whatever remains in the transportation budget. A new corporate structure does not change that. Britain's 1990s separation of infrastructure from train operations produced fragmentation and rising costs, and Britain is now moving toward reintegrating them under Great British Railways. Amtrak should not adopt the structure Britain is unwinding.

Our requests to the Board:

1. Publish the organization chart, cost projections, and labor analyses requested above, and open a further public comment period
2. Commit in writing to the labor protections described in this comment
3. Decline to finalize any restructuring ahead of Congressional review
4. Pursue dedicated, predictable federal funding for Amtrak alongside any structural change

Respectfully submitted,
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