

**International
Association of
Machinists and
Aerospace Workers**



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OFFICE OF THE INTERNATIONAL PRESIDENT

January 18, 2024

Submitted via online portal at regulations.gov

Amit Bose
Administrator
Federal Railroad Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Re: [Docket No. FRA-2023-0099] Proposed Nonavailability Waiver of Buy America Requirements: Nevada Department of Transportation to Purchase Certain High-Speed Rail Components

Dear Mr. Bose:

The 600,000-member International Association of Machinists and Aerospace Workers (IAM) commends the Biden-Harris Administration and Brightline West for pushing forward with groundbreaking efforts to ensure continued growth of high-speed rail transportation in the United States.

The IAM, which was founded as a railroad union in 1888, has strong roots in the nation's rail industry and is a consistent champion for growth in this vitally important sector that benefits both American workers, riders and taxpayers at large. The IAM represents a diverse membership, including thousands of rail workers at Amtrak, regional commuter rails, freight carriers and rail industry manufacturing workers. The IAM is proud that our nation's rail industry has helped create thousands of high-quality union jobs that have helped communities prosper across this great nation. **On behalf of this proud and diverse rail industry workforce, the IAM strongly opposes Nevada Department of Transportation ("NVDOT") proposed waiver of Buy America requirements to produce two complete trainsets for the Brightline West high speed rail project overseas.**

We applaud President Biden for his strong commitment to policies intended to grow high-quality union jobs through U.S. transportation and infrastructure investments. **U.S. taxpayer dollars should be used to support high quality jobs here in the United States. Investments in high-speed rail projects should be no exception to this venerable goal.**

Domestic content policies, such as Buy America requirements in transportation and infrastructure projects, serve the public good by targeting taxpayer dollars for the purchase of American made products and components, thereby employing U.S. workers and putting our federal tax receipts to work here at home. Buy America requirements help ensure that our tax dollars are used to support the U.S. workforce and the firms who employ them.

However, for far too long we have neglected to properly harness the potential benefits of federal spending. We as a nation need to act strategically when it comes to federal government spending. Not only do we need to supply transportation and infrastructure projects with the best possible domestically-sourced materials and components, but we must also use these federal investments to support our domestic industrial base, including manufacturing workers and the employers across America that constitute the domestic supply chain for critical transportation and infrastructure programs. We must understand that the foundation of our industrial base lies with the skills and abilities of the American worker.

The IAM firmly believes existing U.S. industry has the capacity to produce high-speed trains domestically while simultaneously growing this industry and the American workforce. For example, the IAM District Lodge 19, Local Lodge 2741 members at Alstom's modern facility in Hornell, NY., are currently producing the high-speed trains that will replace the current fleet of Amtrak's Acela service.

The Alstom facility employs hundreds of highly-skilled IAM railcar manufacturing workers. Based on the promise and understanding that Buy America is the law of the land, the company recently invested more than \$80 million to modernize and upgrade its Hornell manufacturing facility. New York State contributed an additional \$30 million based on the premise that the federal government would adhere to existing Buy America requirements and source projects such as train sets for the Brightline high speed rail project domestically. These state and private investments in the facility have helped leverage more than \$250 million in additional investments across the Hornell community.

The domestic supply chain for Amtrak's new Acela high-speed train includes suppliers in more than 25 states, accounting for more than \$590 million in economic benefits. This is the type of outcome that we believe the Biden-Harris Administration would like to see multiplied across the nation. These outcomes are made possible only with a continued, unwavering commitment to Buy America domestic content policy.

The IAM greatly appreciates the Biden-Harris Administration for its commitment to a future of extending U.S. high-speed rail transportation. We encourage this growth of high-speed rail with making good on the administration's promise to stand with American workers. **For all of these reasons, we strongly oppose NVDOT's proposed waiver to Buy America requirements for two full train sets for the Brightline West project to be manufactured overseas.**

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Bryant", with a long, sweeping horizontal line extending to the right.

Brian Bryant
IAMAW International President