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December 17, 2020

Doctor José R. Romero, MD, FAAP
Chair, Advisory Committee on Immunization Practices
c/o Centers for Disease Control and Prevention
1600 Clifton Road NE, MS H24-8
Atlanta, GA 30329-4027

RE: Docket No. CDC-2020-0121 - Phase 1B COVID-19 Vaccine Distribution

Dear Chairman Romero and Members of the Advisory Committee:

On behalf of the Railway Supply Institute (RSI) and the entire railway supply industry, we thank you for your efforts to ensure the safe and efficient distribution of a COVID-19 vaccine. RSI understands and supports the recommendations provided by the Advisory Committee on Immunization Practices (ACIP) thus far to prioritize this vaccine first to frontline health care workers and those individuals in the highest-risk populations. As the Advisory Committee continues to consider the appropriate allocation of this vaccine with regard to Phase 1B distribution plans, we respectfully urge you to include essential critical infrastructure workers in the “Transportation and Logistics” and “Critical Manufacturing” sectors to ensure that our transportation systems can continue to operate safely and without disruption.

The railway supply industry includes roughly 125,000 workers across the United States who provide critical rail supply equipment and services to the nation’s passenger and freight rail network.¹ A significant portion of these workers are part of the nation’s critical infrastructure workforce as defined by 42 U.S.C. § 5195c(e), Presidential Policy Directive 21 (PPD-21) and the United States Department of Transportation. Earlier this year, the Cybersecurity and Infrastructure Security Agency (CISA) issued a memorandum to provide guidance on the essential critical infrastructure workforce and identified “transportation and logistics” workers as well as “critical manufacturing” workers as essential to continued critical infrastructure viability.

Workers in these categories enable the manufacture, maintenance, and repair of rail equipment and packaging materials that are essential to supporting the passenger and freight railroads as they deliver people, food, fuel, medicine and other supplies that will sustain the nation during the continued response to this pandemic and help stabilize our economic recovery.

The availability of a vaccine for these workers would significantly enhance this industry’s ability to perform its duty to maintain the essential rail supply chain and provide services to support critical rail operations while also ensuring the health, safety, and well-being of our workers and the residents of the communities in which we live and work.

¹ Tracking the Power of Rail Supply, The Economic Impact of Railway Suppliers in the U.S. <https://www.rsiweb.org/Files/EIS%202018/RSI-Infographic%20FINAL.pdf>

We appreciate the Advisory Committee's ongoing work to keep Americans safe as we continue the fight against COVID-19 and thank you for your consideration of this request. If you have any questions, please contact me at brewin@rsiweb.org.

Sincerely,

A handwritten signature in black ink that reads "N. Brewin". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Nicole Brewin
Vice President, Government & Public Affairs
Railway Supply Institute