



Transportation Division

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May 26, 2016

Mr. Robert Lauby
Associate Administrator for Safety
Federal Railroad Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Lauby:

The recent NTSB findings show that radio distraction was the likely cause of the terrible Philadelphia Amtrak crash which prompts me to write you this letter.

Overloaded radio communications are happening all over the country, and some railroads are making things worse by requiring needless radio broadcasts by train crew members. This further congests the radio airways and creates constant distracting noise in locomotive cabs. For example an already big problem is now being exasperated on the Canadian National Railroad. A copy of their most recent directive for "Broadcasting of Restrictions" is attached. Places where there is too much radio traffic impairs the ability of train crew members to communicate effectively with roadway workers, dispatchers, and other train crews causing safety issues. We have reports from members who say they have lost situational awareness because of the constant blaring of the locomotive radio and I can attest that it has happened to me.

Wayside detectors that report after every train crosses them also contributes to radio congestion, and most of these detectors have such a strong signal they override all other communications. We now recommend to FRA, and have recommended to some railroads, that detectors only broadcast over the radio when a defect is found, just like a home smoke detector does. There should be some exceptions to this recommendation such as allowing the reporting of a trains axel count at the first detector outside a terminal.

Some of the effects of radio congestion are:

- All or part of a message is not received;
- A crew does not act on instructions intended for them;
- A crew acts on instructions intended for another train;
- Unacceptable delay in establishing contact with or relaying a message;
- The workload of the dispatcher and crew is increased due to the need to resolve the confusion that leads to radio congestion.

Another problem occurs when railroads operating procedures require changing radio channels. This was a contributing factor in the Casselton, ND oil train accident two years ago. Crews can miss an important message when they change channels. CN requires in its rule 411 that crew members contact the train dispatcher when whistling in a quiet zone, which most often occurs due to other rules in place for whistling for Roadway Workers and E-testing by CN managers. When a crew has to change to a different radio channel to contact a dispatcher they sometimes have to wait 10-15 minutes for a dispatcher to answer their radio.

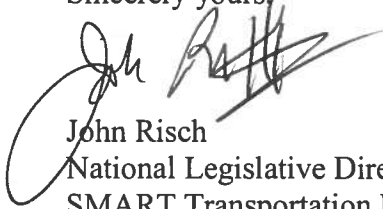
Even more bizarre is that some railroads require that every block signal be called out over the radio, even ones that are clear--- a ridiculous and congesting requirement.

Those who are writing these radio rules are doing so because they actually believe that these requirements will make things safer, when in reality the opposite is occurring.

I'm bringing this to your attention now because, clearly there is a problem out there and the NTSB has it on their radar. I believe there could be some modest changes to railroad operating rules that would greatly reduce radio congestion, and we have asked railroads many times to do so, but unfortunately we have made no progress.

I respectfully request that we meet with FRA, with or without the railroads, and discuss this problem.

Sincerely yours,



John Risch
National Legislative Director
SMART Transportation Division

CC: John Previsich, SMART-Transportation Division, President
John Tolman, Brotherhood of Locomotive Engineers & Trainmen National Legislative Representative
Greg Hynes, SMART-Transportation Division Alternate National Legislative Director
Vince Verna, Brotherhood of Locomotive Engineers & Trainmen, Director of Regulatory Affairs


SOUTHERN REGION
Operating Practices Department

Homewood, IL
May 2, 2016

SYSTEM OPERATING BULLETIN NO. 9
ALL CONCERNED:

SOUTHERN REGION
ALL DIVISIONS

Make the following changes to CN U.S. Peer to Peer Guidelines, First Edition.

Page 1

CHANGE TITLE and Content in item 5, Advance Warning of Restrictions, to read:

5. ADVANCE BROADCAST OF RESTRICTIONS

Crew members in the cab of the controlling locomotive must communicate to each other of all restrictions, in sufficient time, to ensure compliance.

Except when switching, in an emergency, or when movement is traversing or within 150 feet of a defect detector a broadcast by a member of the crew must be made to the airwaves when:

1. Entering the main track and at each mile post location ending in (5) stating any restriction(s) from that mile post to the next milepost ending in (5). If more than 2 restrictions fall within this 10 mile area just state "Multiple Restrictions", or if NO restrictions just broadcast "No Restrictions". All broadcast must include designation (initial and number of locomotive), direction and specific track (at multiple main track locations).

"Restriction" refers to any of the following:

- Planned Work, (USOR 1102)
- Speed Restriction, (USOR 1103)

Note: *Transmission NOT required when train's authorized speed is equal to or less than speed restriction approaching.*

- USOR 529 (A, B or C)
- Track Authority when:
 1. Switch warning identified in box 9,
 2. Approach to end of limits identified by either box 2 or 6, or
 3. Joint with identified by box 8

Examples:

"CN 5600 North, MP 125, Rule 1102 at MP 133, Rule 1103 at MP 134, out"
"CN 5600 North, MP 135, 529A at MP 139.4, "joint with" limits with EIC Jones at MP 142, out"
"CN 5600 North, MP 145, Multiple Restrictions, out"
"CN 5600 North, MP 155, No restrictions, out"
"CN 5600 North, MP 165, Switch Warning, Box 9, at MP 170.9, out"
"CN 5600 North, MP 175, end of Track Authority Limits, MP 184, out"

2. Passes a signal at a control point or at a signal that is the approach to a control point that requires:
 - a. being prepared to stop at the next signal,

- b. being prepared to pass the next signal at Restricted Speed, or
- c. Restricted Speed.

3. Stops for a signal that requires stopping.

Signals in items 2 and 3 are to be broadcasted when the signal is observed from the head end of the train and broadcast must include:

- 1. Initial & Engine number,
- 2. Direction, location, and
- 3. Signal name

NOTE: In all cases, if movement is traversing or within 150 feet of a defect detector, DO NOT make a radio transmission until the entire train has passed, and message received.

Signed: J. L. Whitt – Senior Manager Operating Practices
Operating Bulletins in effect: 1, 3-9

- If movement starts less than $\frac{1}{4}$ mile from the crossing, signal may be sounded less than 15 seconds before entering the crossing when it is seen crossing gates are in the fully lowered position or no traffic is approaching, or traffic is stopped at the crossing.
- Prolong or repeat signal 410 (7) until the crossing(s) is completely covered.

EXCEPTION: Whistle signals 410(3) and 410(5) do not apply during switching movements.

Other forms of communication may be used in place of whistle signals, except signals 410(1), 410(6), and 410(7); and for passenger trains only signal 410(3).

For all required whistle signals (1) - (7), engineer must fully pull whistle handle or fully depress whistle button to ensure maximum warning is provided. Improper use of the whistle is prohibited.

If the whistle on the lead unit fails enroute, and no other unit can be used as the lead unit, ring the bell continuously approaching and passing stations, yards, and public crossings at grade. If the whistle on a trailing locomotive can be used, the conductor or other qualified employee will use that whistle under the direction of the engineer.

If no other whistle is available, stop the train before entering each public crossing, place a crew member on the ground at the crossing to provide warning until the crossing is occupied, unless:

- Crossing gates are in the fully lowered position, or
- No traffic is approaching, or traffic is stopped at the crossing.

411. LOCOMOTIVE WHISTLE QUIET ZONES. At locations designated in the timetable, whistle signal 410(7) must not be sounded for public grade crossings except when:

- Emergency or dangerous situations exist, or
- Rule 529 is in effect.

If Roadway Workers are on or near a crossing in a quiet zone, use whistle signal 410(6).

When the whistle is sounded, engineer must notify RTC with the following information:

- When,
- Where, and
- Why

All Locomotive Whistle Quiet Zones are in effect 24 hours unless otherwise noted in Timetable Instructions. Locomotive Whistle Quiet Zones that are not 24 hours must be equipped with both a standard Whistle sign and No-Whistle sign on each post.

412. HEADLIGHTS. Turn the headlight on bright to the front of every moving train. It may be turned off when the train is not moving. Engines working in yards will have headlight displayed at all times, however, it may be turned off on the end coupled to cars.

Except when approaching and passing over a public crossing at grade, the headlight may be dimmed:

- Approaching or being approached by an opposing train or engine,
- Approaching stations where passengers are received or discharged,