



SMART-TRANSPORTATION DIVISION  
AND  
BROTHERHOOD OF LOCOMOTIVE ENGINEERS AND TRAINMEN

BEFORE THE U.S. DEPARTMENT OF HOMELAND SECURITY

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Transportation Security Administration

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TSA-2015-0001  
RIN 1652-AA55

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March 16, 2017

The Brotherhood of Locomotive Engineers and Trainmen (BLET) and the Transportation Division of the International Association of Sheet Metal, Air, Rail and Transportation Workers (SMART TD) represent the vast majority of operating train crew members across the country and submit the following comments on behalf of our members.

These comments are submitted in response to the Transportation Security Administration (TSA)'s proposal to require security training for employees of higher-risk freight railroad carriers, public transportation agencies (including rail mass transit and bus systems), passenger railroad carriers, and over-the-road bus (OTRB) companies. Owner/operators of systems would be required to train employees performing security-sensitive functions, using a curriculum addressing preparedness and how to observe, assess, and respond to terrorist related threats and/or incidents.

We support stronger security training requirements for surface transportation employees who serve a critical role in the movement of passengers and commercial goods nationwide. Train operators in particular are responsible for the movement of hazardous materials, which can be a high-risk target for terrorist attacks.

The 9/11 Act required that TSA encourage the participation of labor unions in the crafting of this rulemaking. Congress understood that the participation of employees and their unions is a critical element in developing any training program, as we understand how good training programs should work and can suggest ways to improve company training plans. Given that there is no better source for information on how a transit system or railroad operates day to day than the employees, and by proxy the unions that represent them, we urge TSA to include a requirement in the final rule that owners/operators consult with employees and their union representatives when drafting and submitting training plans to TSA. By doing so, TSA will ensure that the plans are most likely to consider the individual circumstances of a transportation operation, and be effective in promoting transportation security.

Our nation's railroad system is vast and far reaching and conductors and engineers on trains are in the best position to spot security threats. This vast rail system has many security gaps that exist, such as the lack of fencing, inadequate lighting, and limited private security on most rail lines and rail yards. We are concerned that a train could be hijacked as easily as an automobile, given that readily available locomotive simulators exist online, which can instruct criminals how to operate a locomotive. For these reasons, and more, our members need adequate security training so they can properly respond in the event of an attempted locomotive hijacking with the intent to use the train (oil/ethanol) as a weapon.

Furthermore, communications from a train are not always timely. Operating railroad employees are limited from using their personal cell phones by railroad rules and federal regulation, which can delay the reporting of emergencies. Radio congestion on many railroads make it difficult to call for help, and in some cases, trains are so long that when a crew member walks to the rear of the train he or she can no longer communicate with the locomotive engineer or anyone else. Even when calls for help are made from the train's locomotive to the dispatching center there have been instances where the crews had to wait for as long as 20 minutes before a train dispatcher responded to the emergency call.

Below are two articles which expose security threats on rail lines and rail yards that recently occurred in Chicago, Illinois:

**March 3, 2017**

[The Associated Press: Gangs reap guns from trains in violent Chicago neighborhoods](#)

**November 27, 2016**

[CBS News Chicago: Police: CN Railroad Security Guard Killed In Harvey Shooting Identified](#)

Most of the security training that we are aware of from Class 1 freight railroad carriers involves watching a video or is computer based, which we refer to as “training on your own.” These videos focus on instructing our members to stay alert and report any suspicious activity. So strengthening this modest training would be not only beneficial for our members, but for our national security as well.

Security training standards for surface transportation employees can be strengthened as follows:

- 1) Training should be conducted in a classroom where questions can be asked and employees can learn from not just the prepared curriculum, but from questions and discussions about likely events that can occur in the workplace.
- 2) Security training instructors should work with employees through various scenarios, specifically: (a) what to look out for and how to properly respond to different security threats; and (b) explain the specific role each employee serves in responding to security threats; and how these roles can change and what they should do to adapt.
- 3) Training should include how to respond to an attack, high jacking or kidnapping.
- 4) The rule should allow transportation employees, with proper training, to carry a taser or mace for the purposes of self-defense. Far too often, by the time help arrives, our members are already injured and the perpetrator has left the scene.

In 2014 the Federal Railroad Administration (FRA) published a final rule (79 FR 66459) which established minimum training standards for all safety-related railroad employees, as required by the Rail Safety Improvement Act of 2008 (RSIA). We urge TSA to engage with the FRA to implement improvements to those training standards and make sure that both sets of standards don't conflict with one another.

In the past several years we have seen a dramatic increase of in-cab distractions, such as excessive radio communications, and the integration of computer-generated devices such as ‘Trip Optimizer’ and ‘Leader’. These distractions cause train engineers to constantly look away from the track ahead of them and, instead, focus on in-cab computer screens. These distractions are now being exacerbated with the implementation of Positive Train Control (PTC). These in-cab distractions restrict what a train engineer can see, making it critically important that a second crew member be present in the locomotive to watch for any potential security threats. Two-person minimum train crews are vital toward defending our national security.

We urge you to take our comments and expertise into consideration as you move forward with a final rule.

Thank you for the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dennis Pierce". The signature is fluid and cursive, with a large initial "D" and "P".

Dennis Pierce  
National President, BLET/IBT

A handwritten signature in black ink, appearing to read "John Previsich". The signature is fluid and cursive, with a large initial "J" and "P".

John Previsich  
President, SMART-Transportation Division