

Passenger Hours of Service Work Group Report



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Passenger Hours of Service Rulemaking



- The RSIA of 2008 granted FRA authority to promulgate substantive hours of service regulations for train employees of commuter and intercity passenger railroads. To allow FRA to accomplish this, these employees remain under the hours of service law as it existed prior to the RSIA of 2008 for 3 years from the date of enactment of the RSIA of 2008.
- If FRA does not have such regulations in effect by October 16, 2011, the hours of service requirements for train employees contained in the RSIA of 2008, which are now applicable to freight train employees, would go into effect for commuter and intercity passenger train employees.

Passenger Hours of Service Working Group



- Kick-off meeting June 2009 in Washington, DC.
- Working group met February 2 and March 4-5, 2010.
- Next Working Group meeting scheduled for April 6, 2010 in Washington, DC.

General Working Group Approach



- Existing hours of service provisions for train employees (pre-RSIA of 2008) would remain in place as a “floor.”
- Railroads would analyze fatigue implications of the schedules their employees work, using the Fatigue Avoidance Scheduling Tool (FAST) and submit fatigue management plans to FRA (also required as part of risk reduction plan, intended to mitigate existing fatigue)
- Mitigation of fatigue risk, from a set of developed mitigation tools, would be required where analysis reveals effectiveness level below a certain standard.

HOS RSAC Task Force Report



- The APTA HOS task force was formed a little over a year ago and has been meeting regularly to identify areas of possible risk for fatigue of T&E employees of passenger railroads.
- A fatigue consultant hired by APTA has been working with the group to conduct the analysis.
- Utilizing the FAST model, analysis has been completed on scheduled assignments submitted by the railroads.
- Analysis has also been completed on actual work histories for the month of July, 2009 for 5 of the major passenger railroads.

Railroad Submission Status



	Posted Schedules	Extra Lists	Relief Days	Regular Actual
1. MNR	X	X	X	X
2. NJT	X	X	X	X
3. SEPTA	X	X	X	X
4. LIRR	X	X	X	X
5. AMTRAK	X	x	X	X
6. Metrolink	X	X		
7. MARC	X	X		
8. VRE	X	X		
9. METRA	X			
10. Sound Transit	X			
11. Alaska				
12. Cap Metro				
13. Utah	X			
14. SFRTA	X			
15. CALTRAIN	X			
16. ALTAMONT	X			
17. MBTA				
19. TRIMET	X			

Crew Run Schedule Analysis Using the FAST Model

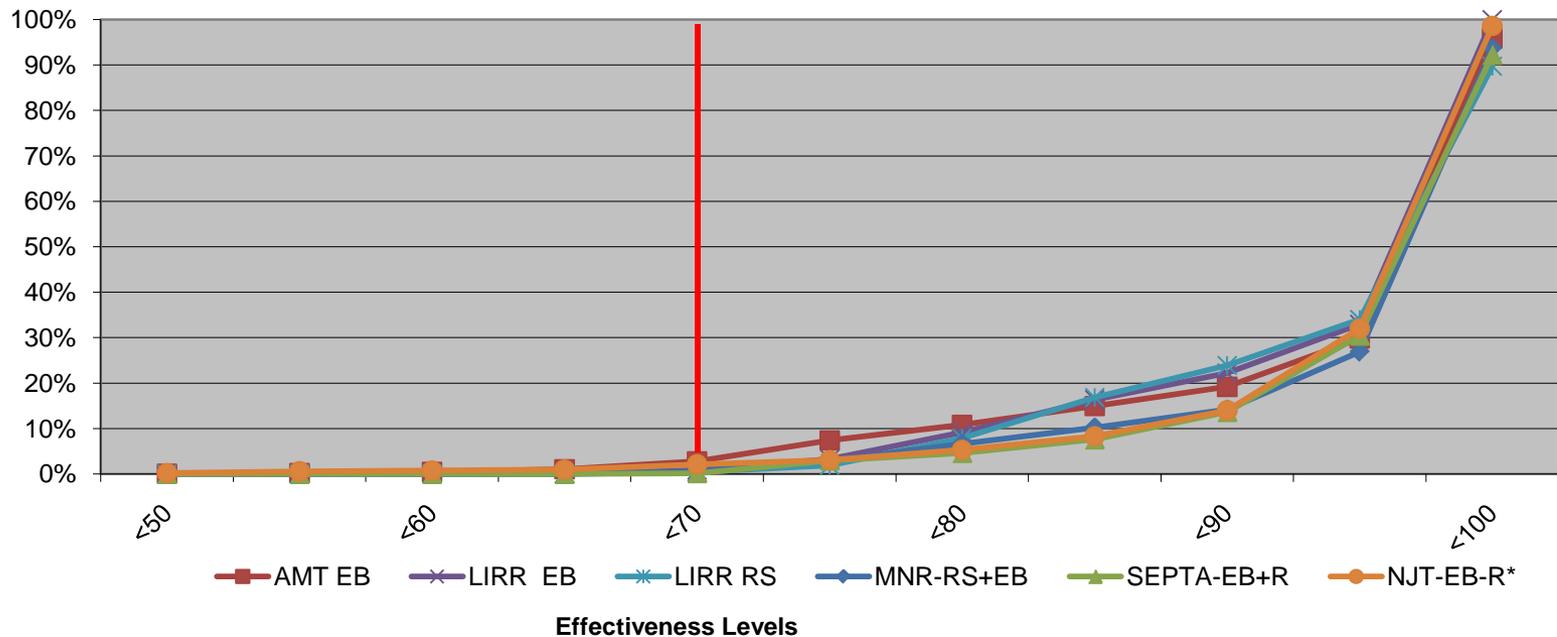


Road	Observations	Effectiveness % < 70	Avg Duration (hrs)	% > 11.9 hrs
MNR	3321	2.1%	10.62	22.6
Metrolink	231	0.0%	12.23	52.2
NJT	2839	2.4%	10.70	23.4
SEPTA	941	1.4%	10.50	19.6
SFRTA	265	0.0%	7.5	0.0
UTAH	265	1.1%	9.23	0.0
Total	7876	2.0%	10.53	21.9

Major Commuter Railroads Risk of Operating Fatigue



Major Commuter Railroads Cumulative Percent of Time Working Under Threshold



- Looking at 80% of railroad operating personnel in the USA.
- Majority less than 1% of time operating at risk for fatigue.

HOS Task Force Objectives



- Complete analysis of areas of possible risk for fatigue, for T&E employees
- Complete development of tool box mitigations that address areas of risk for fatigue (16 mitigations have been developed)
- Validate that the mitigations reduce exposure to fatigue
- Produce a consensus rule
- Compose a preamble to the rule
- Develop a guidance document for a railroad submission for risk reduction of hazard for fatigue

Railroad Risk Reduction Submission



- Each passenger railroad will conduct an analysis to determine risk for fatigue.
- Where risk to fatigue is found, mitigations will be utilized to reduce risk.
- Railroads will submit results of analysis and risk reduction plan to FRA for approval.

FRA Internet Site



- **FRA internet site will contain:**
 - Guide for fatigue risk reduction submission
 - Fatigue model to conduct analysis
(training on use of the model will be provided)
 - Mitigations to address areas of risk for fatigue
 - Table of acceptable schedules
 - Training programs for consideration

Schedule to Implementation



- Task force to complete work on a draft rule and preamble language at next task force meeting scheduled for March 30 & 31
- Submit rule for vote at the next HOS RSAC meeting scheduled for April 6th
- Submit consensus recommendation to the full RSAC (possible electronic vote)
- NPRM in fourth quarter of 2010
- Final Rule no later than October 2011

Note: The task force will continue to meet to complete our objectives

Passenger Hours of Service



Questions?