



Federal Railroad Administration

[Excerpts-Updates]

Remarks for PTC Working Group

Philadelphia

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Objectives

- Rule status generally
- Efforts toward “Adjusted Base Case”
- Other Risk2 issues
- Progress on risk assessment
- Implications for going forward
- Further actions on the rule
- Cost/benefit study

Disclaimer

Opinions expressed are mine

As always, they are expressed here
to inform

and to elicit corrective responses

Rule Status

- **FRA preparing to move forward**
- **DOT policy to move overdue rules**
- **Suppliers, railroads deserve to know what the rules will be**
- **Members of this working group support early action**
- **Will complete FRA action on final rule by Labor Day**

Outstanding Issues as of March 2003

- Adjusted base case is the major unresolved issue
- Generalization

Other Developments

- **ASCAP progress**
- **Continued work expected**
- **Human factors remain big issue**
- **Increased use of COTS hardware / software presents larger zone of uncertainty**
- **Cost of safety analysis is growing**

Other Developments

- Standards for interoperability have not emerged
- Technologies continue to proliferate indicating more diversity than commonality
- Existing projects have presented greater challenges than initially anticipated
- FRA is on the receiving end
- FRA resources may not grow in the future

Implications

- Assume “adjusted base case” is successfully resolved
- Final rule needs to be flexible, encourage use of failsafe (Subpart A-G compliant) technology where appropriate in context
- Option--traditional approach with good safety documentation and configuration management?
- Continued ability to qualify innovative systems using rigorous risk assessment

Implications

- **FRA needs to see results of IDOT, other efforts before venturing to a pure performance-based approach to high speed rail**
 - Where frequency of residual events is lowest, uncertainty is a bigger problem
 - FRA should be able to accept credible risk assessment, but should not be boxed where the case is close
 - Benefit/cost considerations should be on the table

Implications

- But if we can mature these processes
Part 235 should be re-examined

Further Actions on the Rule

- Provide data / analysis to Risk2 (Volpe 4/03)✓
- Complete Risk2 recommendation on base case (Risk2 group 5/03)✓
- PTC Working Group review and act (7/03)
- RSAC review and act (8/03)

Cost/Benefit Mandate

- **Initiated by Senate Approp. Comm.**
- **Conferees adopted**
- **Scope: costs/benefits of PTC “and related systems”**
- **Take into consideration—**
 - Advances in technology
 - Savings to carriers and shippers
 - Priority to mix of passengers and freight
- **Letter report by 10/1/2003**

Cost/Benefit Mandate

- **Safety impetus**
- **Impression that costs may have fallen**
- **Concern that investments in technology may not be forward-compatible**
- **Deadline and report format indicate desire for quick turn-around**

Cost/Benefit Plan

- **Contract study on costs and business benefits**
 - Informal consultation with members
- **ART team help to describe architectures with current relevance / resort yeses and maybes at 2 levels (underway as of 5/03)**
- **FRA to integrate cost and benefit information**

Cost/Benefit Plan

- PTC Working Group review draft letter report
- Make changes as appropriate
- If changes not agreed upon, succinctly reflect views of parties
- Recommendations to full committee