



February 26, 2016

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

Dear Mr. Lauby,

The Transportation Division of the International Association of Sheet Metal, Air, Rail and Transportation Workers (SMART TD) and the Brotherhood of Locomotive Engineers and Trainmen (BLET) request that the FRA withdraw our petition (dated January 12, 2016) for a rulemaking to mandate uniform warning speed signs in advance of speed restrictions. However, we submit that railroad speed signs, both temporary and permanent, should be standardized as to dimensions, conspicuity and color and their distance ahead of a speed restriction. **Therefore, we ask that this issue be presented to the RSAC at your earliest convenience.**

Below is a detailed list of reasons why speed signs are a vital aspect of safe railroad operations and the current state of speed sign usage on major railroads:

- It is simply not enough to put speed restrictions in a railroad's time table or train orders. Speed signs are necessary to alert a crew in advance of a speed restriction and to identify exactly where the speed restriction begins and ends. Speed signs on railroads are even more vital than they are on highways because a car or truck can reduce their speed in a short distance, while a heavy freight train can take more than a mile.
- Speed signs are critical because trains operate at all hours and under all conditions, including heavy fog, driving rain, blizzards and complete darkness. Under extreme weather conditions it is very difficult for the operating crew to determine the exact location of a speed restriction. In addition, oftentimes mile markers are hard to see or are missing resulting in crews overlooking the restriction entirely.
- BNSF, CP, CN and other railroads are implementing something called "super pools," which require crew members who historically have worked a particular run for years – and know the track characteristics in great detail – to work unfamiliar runs after as few as one or two familiarization trips. Their first outings are oftentimes at night in territory they are inadequately acquainted with.

- At railroad terminals across the country the youngest, most inexperienced crew members are forced to work extra boards in all directions over hundreds of miles of track. For example, on BNSF in Dilworth, MN there are almost 1,200 miles of track a new employee is required to cover – something that typically would take years to learn in an intimate way.
- When speed signs are not posted, the crew is forced to constantly review their timetable and train orders, forcing them to focus on these documents, rather than the track ahead.
- When there are two-mile advance speed signs in place the engineer can use his train distance counter to determine the actual distance to the restriction and slow the train gradually and safely. Distance counters have become one of the most valuable tools at an engineer's disposal. Similarly, when there is a sign located at the end of the speed restriction, the engineer can push his counter and know precisely when his train is over the restriction. In the absence of speed signs, the engineer must rely on mile posts that are sometimes missing. Besides, speed restrictions seldom start or end at a mile post; rather they most-often start and end at some midpoint between mile posts, making it virtually impossible to determine where the restriction actually begins and ends without a sign.
- While our information on speed violations are verbal reports from the field, we have been told on many occasions that when speed signs are nonexistent, restrictions are simply overlooked and violations are common. The FRA's accident data indicates that there have been numerous accidents caused by excessive speed and improper braking. Inadequate or nonexistent speed signs are likely a contributing factor in many of these cases.
- Many crews work on more than one railroad subdivision in the course of one day. Meaning they can start on the BNSF – a railroad with proper speed signs – then divert over to the CN where there are no signs. Crew members who are reliant on the posted signs are then caught off guard by the lack of speed signs on the diverging railroad.

**Based on reports from the field, these are the speed sign situations of specific railroads:**

**BNSF**

BNSF has the most signage. At both permanent and temporary speed restrictions they have an advance speed sign located two miles ahead of the restriction. A permanent restriction then has a sign with the posted speed at the beginning of the restriction and a green sign at the end of the restriction. A temporary speed restriction has a sign on the left side of the entry to the restriction and a green sign on the right at end of the restriction. In addition, temporary speed restrictions are listed in the crew's train orders and permanent speed restrictions are listed in the timetable.

**CN**

This railroad lacks speed signage altogether. They have no speed signs for either permanent or temporary restrictions. Crews must rely exclusively on their train orders and timetable.

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## **CP**

CP has signs displayed in most places for permanent restrictions, but does a poor job of replacing them when they are knocked down. All temporary speed signs were officially discontinued on January 1, 2016. In addition to this poor practice, CP now requires engineers to qualify on adjacent territories, where they will rarely work.

## **NS**

NS has no speed signs for temporary restrictions. Notification of these restrictions are located in the crew's orders.

Some NS permanent restrictions have a sign  $\frac{1}{4}$  of a mile in advance of the restriction. This is far too short a distance for an engineer to safely slow a train for a restriction. When leaving the restriction, there is sometimes that same  $\frac{1}{4}$  mile sign on the left side of the track that has a green back to it. This is not always the case, and it depends on what former railroad operated that section of track. In some cases, a silver diamond shaped sign is used.

In a desperate effort to remind themselves of upcoming speed restrictions, crew members on NS use chalk to write on the windshields, sharpies to write on the front heater, control stands and other areas inside the locomotive cab.

## **CSX**

CSX does not have any advance notice of permanent speed restrictions. There is only a sign at the start of the restriction. At the end of the restriction, the crew can look at the opposing sign on the left side of the tracks that has a green back.

Temporary restrictions mostly have advance signs and signs at the point of the restriction. The crew's orders will indicate if signs are displayed or not.

## **UP**

UP uses advance speed signs 2,500 feet in advance of the permanent restriction with a speed sign with arrow pointed down. This 2,500 notice is inadequate to safely slow a heavy train at top speed. At the end of the restriction there is a sign with an arrow pointed up that posts the maximum allowable speed.

Temporary restrictions have a sign 2 miles in advance, a sign at the restriction and a green sign at the end of the restriction.

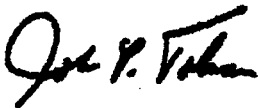
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Once again, we respectfully request that the FRA withdraw our petition for a rulemaking, and, instead, ask that this issue be presented to the RSAC at your earliest convenience.

Thank you for considering this request.

Respectfully Submitted,



John P. Tolman  
National Legislative Representative  
Brotherhood of Engineers and Trainmen



John Risch  
National Legislative Director  
SMART-Transportation Division



January 12, 2016

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

Dear Mr. Lauby:

**Petition by the  
International Association of Sheet Metal, Air, Rail and Transportation Workers  
Transportation Division  
and  
The Brotherhood of Locomotive Engineers & Trainmen  
For Rulemaking Covering Advance Warning Speed Signs**

The International Association of Sheet Metal, Air, Rail and Transportation Workers - Transportation Division and The Brotherhood of Locomotive Engineers & Trainmen hereby petitions FRA for rulemaking that mandates uniform warning speed signs in advance of a permanent speed restriction. The signs should be standardized as to dimensions, conspicuousness, and color.

Recently, some railroads have begun removal of these safety indicators, which creates a hazard for operating crews and the public. In the interest of safety it is necessary to warn road crews of an upcoming speed restriction which otherwise might not be readily apparent. Just as it is unreasonable for a motorist to know each speed restriction without a warning, the same is true for railroad crews. Unlike automobile travel, where speeds can be reduced promptly, trains are unable to comply with a speed restriction without prior knowledge.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John P. Tolman".

John P. Tolman  
National Legislative Representative  
Brotherhood of Engineers and Trainmen

A handwritten signature in black ink, appearing to read "John Risch".

John Risch  
National Legislative Director  
SMART-Transportation Division

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**Cc: John Previsich, SMART-Transportation Division, President  
Dennis Pierce, Brotherhood of Locomotive Engineers & Trainmen, National President  
Greg Hynes, SMART-TD, Alternate National Legislative Director  
E. Lee Pruitt, Brotherhood of Locomotive Engineers & Trainmen, First Vice President  
Vince Verna, Brotherhood of Locomotive Engineers & Trainmen, Director of Regulatory  
Affairs  
Bob Hagan, Brotherhood of Locomotive Engineers & Trainmen, Legislative and Political  
Director**