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Minnesota Legislative Board

A Division of SMART, Sheet metal, Air, Rail and Transit Union
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May 6, 2018

Mr. Ronald Batory
Chief Administrator,
U.S. Federal Railroad Administration,
Department of Transportation
Washington, D.C. 20003

VIA: Electronic Submission and Facsimile: 202-493-2251

RE: FRA-2018-0027, Request for Information About Autonomous Train Operation.

Dear Chief Administrator Batory,

For our 1,100 members of the SMART-TD Minnesota Legislative Board who work as railroad conductors, switch-persons, yardmasters, locomotive engineers and remote control locomotive engineers, please accept my highest encouragement to prohibit any movement of a so-called "autonomous train" or "autonomous trains" in the United States.

We believe states must be allowed to exercise their respective state's right to prohibit the movement of any autonomous train or trains based on the at-grade intersection of railroads and public highways, roads and pathways. Each respective state has the responsibility to protect public safety at railroad grade-crossings. Any introduction of an autonomous train would necessitate a reasonable reaction from a state.

In America currently, trains require a certified conductor and certified engineer on board to assure railroad and public safety. Whether equipped with autonomous train technology (ATT), and/or Positive Train Control (PTC), please consider:

- A train's work tasks remain. Throwing manual switches and dual control switches, coupling cars, coupling air-hoses, setting hand brakes, pulling pin-lifters to switch cars, replacing failed hoses, gaskets, replacing couplers, mechanical and air-brake inspections remain constant work tasks of any operation. Any ATT, PTC, and/or aerial drones cannot do these train tasks.
- When ATT and PTC programs fail enroute, standing or delayed trains must not be permitted to block public roadways as a practice. The uncoupling of a standing train to open a grade crossing to allow vehicles to pass requires two persons.
- After grade crossing collisions with the public, immediate Samaritan response to help the injured is an essential and moral responsibility within the fabric of our society. Two persons on all trains are necessary to assist the public after grade-crossing and other accidents.
- After grade crossing collisions with the public, the question becomes: "*Are railroads going to be allowed to leave injured persons unattended in the ditches of America*". Railroads must not be relieved of responsibilities to the public.

Mr. Ronald Batory

May 6, 2018

Page two.

- **After crossing collisions with public, emergency responders must not be expected to climb on, under, or about railroad equipment to save lives or extract persons without protection. With current two-person crews, a crew member is on-train and on the ground immediately to direct, assist and communicate with emergency response teams at the accident scene.**
- **Mechanical, air-brake, track failures, along with false signal activations occur during yard and mainline operations. A two-person crew is necessary to quickly identify and repair an in-train failure.**
- **After train derailments with hazardous material, it is a train crew member who walks back along the train immediately to decouple cars to reduce a secondary ignition or release source. By federal regulation, the train crew must hold the 100% accurate consist with hazardous material information on board the train at all times to direct emergency response immediately.**
- **During railroad operations, when train that leaves a railroad car, or block of cars standing, or entire train unattended, mechanical handbrakes must be applied and tested to assure the car, cars, or train will not roll away. A mainline train's securement process requires at least two persons.**
- **Visual inspections of moving railroad equipment during mainline and yard operations are essential to safety. Currently track way-side detectors are not federally regulated and carriers can manipulate detectors. Two-person on a train are in position to immediately report fires that ignite from trains along right-of-ways. Train ignited fires impact public and private property.**
- **Locomotive in-cab Crew Resource Management tasks and visual attention demands actually increase due to increased monitor and controls (CRM).**
- **Locomotives in a consist need to have switches reset, gauges monitored, and other failures corrected while a train is moving on a mainline. A two-person crew is necessary to keep the train moving while a crew member walks back through the consist to check locomotives, reset switches, etc.**
- **A two-person crew remains necessary to assure an immediate deterrent and response to train cargo vandalism, pilfering, theft or equipment damage. These responsibilities are critically important with hazardous materials.**
- **Winter and severe weather conditions change the operating characteristics of a train. Two persons are necessary to react to changing conditions that affect safe movement of trains around the clock through towns and cities.**

The railroad carriers and their associations claim two persons will not be necessary on trains with autonomous train control and/ or PTC. These technological control features have nothing to do with the associated tasks of the train-machine behind the locomotives.

The American Association of Railroads and American Short-line and Regional Railroad Association claim there is "no data", "no evidence", and "not supported by facts", that two-person train crew operations are necessary for safe operations. The railroad carriers, their

Mr. Ronald Batory

May 6, 2018

Page three.

associations, technology vendors, and industry consultant statements are untrue and disingenuous at best. The “data” and “evidence” that two crew members on each train are the railroad’s own record profits, record low operating ratios, and safety statistics they enjoy and recite defacto, to their shareholders and the media outlets.

The American Association of Railroads and Short-lines cannot have it both ways. When the carriers extoll their safety records and record profits and then claim “there is no data” or evidence” to confirm two persons on trains are necessary, their same profits and statistical achievements render their claims as not credible. By the same logic from today’s railroad industry leaders, if a person or objective neutral party were to say, “*the sun is bright*”, these same railroads, associations, and invested interests will disagree and insist there is “*no data*” and *no evidence*” to support that statement.

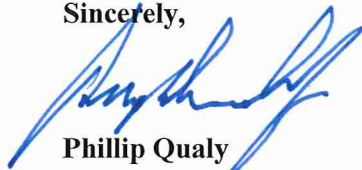
In summary of our concern for any operation of an autonomous train or trains, we cannot allow railroads to run mass-tonnage machines across our country, through towns and cities, with no ability to react and respond to emergencies with the public. The railroads have a moral responsibility to provide for the right of Samaritan response immediately after crossing collisions. The DOT-FRA must not allow railroads to run mass-tonnage machines through our country, towns and cities with no ability to react immediately when the trains are stopped and cannot move. The DOT-FRA must not allow railroads to block crossings, delay public through-fare, emergency response for communities, and claim then their conduct as an acceptable operating practice.

As train crews, we are concerned railroad technology vendors and industry consultants may not be held to the fail-safe and redundant standard required when moving trains. We question the mastery between the physical and geometric tolerances of mass-tonnage machines over one-mile long moving over topography with broad-band signal reception. DOT-FRA must allow the railroad carriers, technology vendors, consultants and other invested interests to experiment on the American people.

If we must accept that “*corporations are people too*”, railroad carrier conduct operating trains across our country must not be allowed to threaten the moral fabric of our society.

Thank you for the opportunity to respond to DOT-FRA Docket 2018-0027-0003.

Sincerely,



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