



March 28, 2011

Mike Elliott, Chairman
Washington State Legislative Board
Brotherhood of Locomotive Engineers and Trainmen

Dear Mr. Elliott,

This is in reference to your January 14, 2011 E-mail memorandum in which you expressed safety concerns pertinent to the BNSF Railway (BNSF) Seattle Subdivision. The safety concerns involved signal systems, signal visibility (vegetation), and train crew/dispatcher communications. You also expressed concerns relative to BNSF dispatcher workloads and staffing levels. The Federal Railroad Administration (FRA) has completed an investigation into the safety concerns in which FRA has jurisdictional authority. The FRA investigation team was made up of Track, Signal & Train Control (S&TC) and Operating Practices (OP) inspectors. The results of said investigation are as follows:

FRA track inspectors conducted hi-rail and walking inspections of the main track between Vancouver and Tacoma, WA, a total of 133 track miles. Special emphasis was placed on identifying conditions related to poorly maintained track and switches that could result in signal block indication problems. The inspection team also looked for trackside vegetation conditions that could affect signal visibility. A total of 245 track, switch and turnout defects were found and reported to BNSF for correction. Many of the defects were related to improperly adjusted switches. Track inspections also revealed a few areas in which trees were leaning into the right-of-way to the extent they were brushing against rolling stock. However, these conditions did not affect signal visibility.

The FRA S&TC inspections included switch, signal, and train ride inspections between Vancouver and Tacoma. FRA inspectors were accompanied by BNSF signal supervisors and maintenance personnel. The scope of the inspections focused on identifying signal block indications problems related to poorly maintained track and switches. During said inspection activities, 221 signals, 170 switches and 109 signal circuits were inspected. A total of 112 signal system defects were identified and reported to BNSF for correction.

FRA OP, S&TC, and Chief Inspectors conducted train riding inspections on the BNSF Seattle Subdivision in an attempt to identify possible train crew/dispatcher communication and signal visibility problems. Eleven southbound and 13 northbound signal visibility concerns, communicated to FRA by BLET representatives, were specifically examined. No difficult signal visibility conditions were noted. Inspections revealed certain locations in which a signal becomes visible to the conductor before the engineer. Complying with GCOR 1.47 allows the engineer to act on the signal indication. In addition, train crew members were interviewed



regarding difficult signal visibility locations and dispatcher communications. Train crew members did not express concerns with signal visibility or dispatcher communications.

With regard to the concern for dispatcher workload and staffing levels; this subject is beyond the scope and authority of the FRA. However, a FRA representative in Fort Worth interviewed several BNSF dispatchers. There were no concerns expressed with regard to staffing or workloads.

The Union Pacific Railroad, Co. (UP), TE&Y Certification General Director for crew reporting was interviewed. He is not aware of any issues regarding dispatcher communications or signal visibility problems and BNSF managers have not shared any such reports on the BNSF Seattle Subdivision. The UP network does not contain any records of UP crews submitting "hot line" reports regarding the aforementioned concerns on the Seattle Subdivision. The Union Pacific Senior Director of Operations was also interviewed. He stated that he has not received any reports regarding BNSF track operations, train length, tonnage, braking issues, or signal aspects on the BNSF Seattle Subdivision.

As a result of the FRA investigation, many track and signal system safety conditions were identified and corrected. Civil penalties are being recommended against BNSF for various track and signal system safety defects. BNSF officials provided assurances that a more effective process will be implemented to insure compliance is maintained. In addition, arrangements will be made for a vegetation contractor to execute a vegetation control process in various areas of concern. FRA will continue to monitor compliance on the BNSF Seattle Subdivision to verify the repair of all safety defects and the execution of BNSF commitments.

We thank you for bringing your railroad safety concerns to our attention.

Sincerely,

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Lenard

Frederick Lenard

Railroad Safety Specialist

Federal Railroad Administration

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